Public Document Pack

Planning Applications Sub-Committee

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**

Members:

Deputy Tom Sleigh (Chair)
Shravan Joshi MBE (Deputy Chair)
Tana Adkin KC
Samapti Bagchi
Matthew Bell
Deputy Emily Benn
Deputy John Edwards
Anthony David Fitzpatrick
Deputy Marianne Fredericks
Alderman Alison Gowman CBE
Alderman Prem Goyal CBE
Deputy Madush Gupta
Josephine Hayes
Deputy Jaspreet Hodgson
Amy Horscroft
Philip Kelvin
Alderwoman Elizabeth Anne King, BEM JP
Charles Edward Lord, OBE JP
Antony Manchester
Tim McNally
Sophia Mooney
Deputy Alastair Moss
Alderwoman Jennette Newman
Deborah Oliver
Deputy Henry Pollard
Alderman Simon Pryke
Deputy Nighat Qureishi
Gaby Robertshaw
Hugh Selka
Naresh Hari Sonpar
William Upton KC
Matthew Waters
Jacqui Webster

Enquiries: **Judith Dignum**
judith.dignum@cityoflondon.gov.uk

Accessing the virtual public meeting

Members of the public can observe all virtual public meetings of the City of London Corporation by following the below link:
https://www.youtube.com/@CityofLondonCorporation/streams

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one civic year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the

City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

Whilst we endeavour to livestream all of our public meetings, this is not always possible due to technical difficulties. In these instances, if possible, a recording will be uploaded following the end of the meeting.

Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

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.

   For Decision
   (Pages 5 - 420)

4. **SUGAR QUAY JETTY**

   Report of the Chief Planning Officer and Development Director.

   For Decision
   (Pages 421 - 602)

5. ***VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT**

   Report of the Chief Planning Officer and Development Director.

   For Information

6. ***DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

   Report of the Chief Planning Officer and Development Director.

   For Information

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

8. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

This page is intentionally left blank

Planning Application Sub Committee	9 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
Reason for being determined by PASC: The application is being determined by PASC as it is considered to be in the broader public interest.	

Summary

I. The application(s) relate to site of Custom House which is approximately 0.99 hectares in size. The site is located on the north bank of the River Thames, bound by Lower Thames Street to the north, Water Lane to the east, Old Billingsgate and Billingsgate Walk to the west and the River Thames to the south.

II. The site contains the Grade I listed Custom House (including the quay) and the Grade II* listed River Wall, Stairs and Cranes. The application site is not situated within a conservation area.

III. The proposals are for the conversion of the London Custom House from an office building into a hotel, entailing extensive works of repair and alteration throughout this grade I listed building and comprehensively reimagining the Quayside and wider public realm in which it has stood for two hundred years as an iconic riverside presence.

IV. The change of use has been justified by appropriate evidence, including by undertaking the requisite Financial Viability Assessment (which has been third party reviewed) and have a provided a market commentary. And while the works would necessarily entail some heritage harm to the significance of the building, this harm has been minimised, is considered justified and would be outweighed by the benefits of the scheme.

V. A heritage-led scheme, the proposals would reintroduce public access into parts of the London Custom House as part of a compelling cultural offer. The proposals have been developed with the input of key heritage sector consultees, including Historic England, and there have been no objections on heritage grounds. Two objections have been received in respect of the use of public realm and the proposed use of the building.

VI. The proposals would deliver a significant new zone of public realm in the form of the Quayside, flood-proofed and relandscaped. This would be one of the single greatest contributions of any application site, in both its quantity and quality, to the public realm of the City, and the proposals would in this respect be transformational.

VII. The change of use would involve acceptable highways and transportation impacts. Though primarily heritage-led, the proposals have, as is customary, been negotiated through the prisms of inclusivity and sustainability and they would deliver improvements in these areas compared to the existing condition of the building.

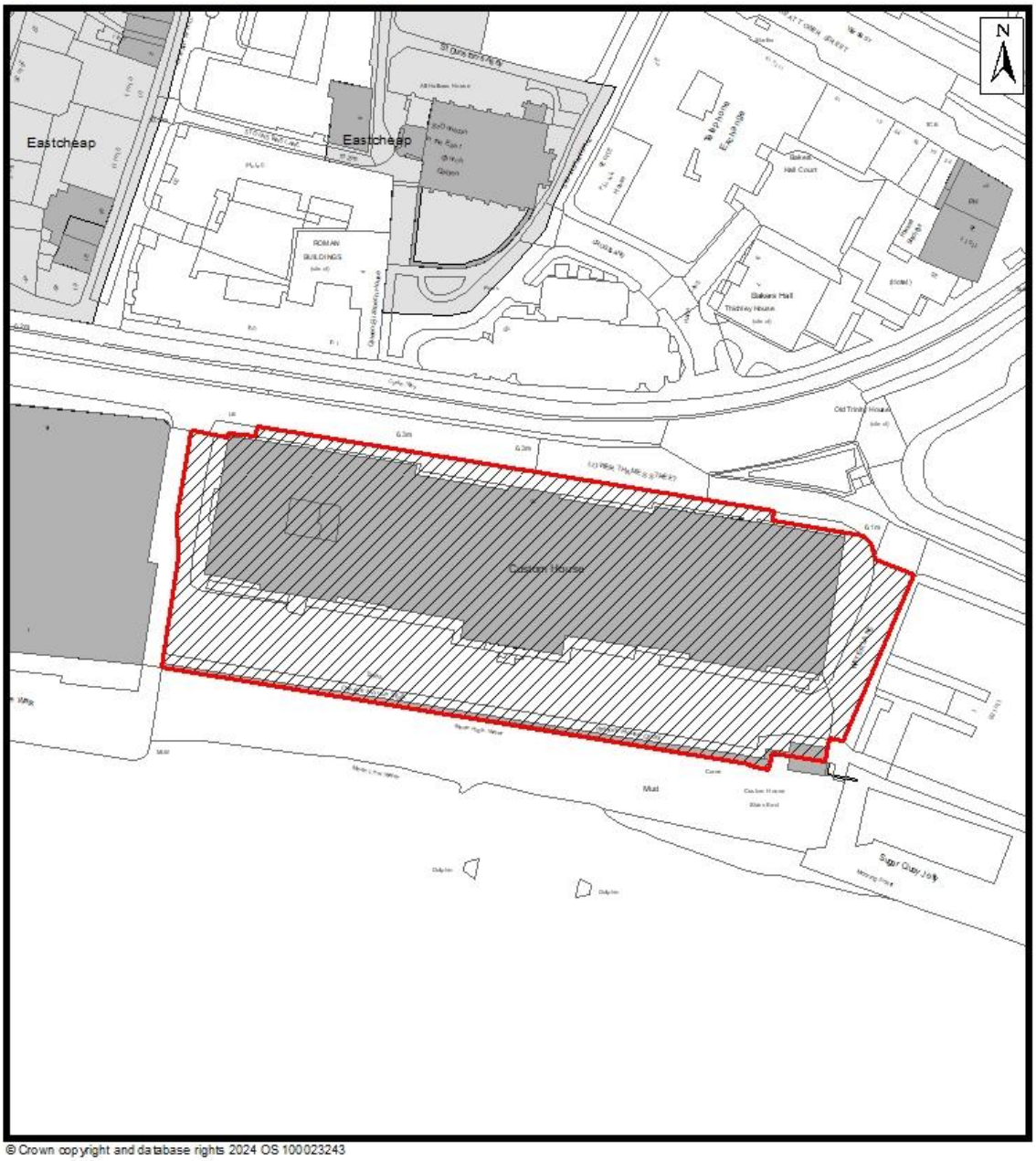
VIII. Officers consider that the proposal complies with the Development Plan when considered as whole. Taking into account all material planning considerations it is recommended that planning permission be granted as set out in the recommendations and the schedules attached. Officers also consider that the application for listed building consent should be granted.

Recommendation

I. That subject to the execution of planning obligation(s) and other agreements being entered into under Section 106 of the Town and Country Planning Act and s278 of the Highways Act 1980 in respect of the matters set out under the heading 'Planning Obligations', and recommended conditions of development, the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule, the decision notice not to be issued until the agreement has been executed; and:

II. That your officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreements under Section 278 of the Highway Act 1980 in respect of those matters set out in the report.

Site Location Plan



© Crown copyright and database rights 2024 OS 100023243

ADDRESS:
Custom House, Lower Thames Street

CASE No.
25/00270/FULMAJ

SITE LOCATION
LISTED BUILDINGS
CONSERVATION AREA BOUNDARY
CITY OF LONDON BOUNDARY

CITY OF LONDON
ENVIRONMENT DEPARTMENT

Site Photo(s)



Image 1



Image 2



Image 3



Image 4



Image 5



Image 6



Image 7



Image 8



Image 9



Image 10

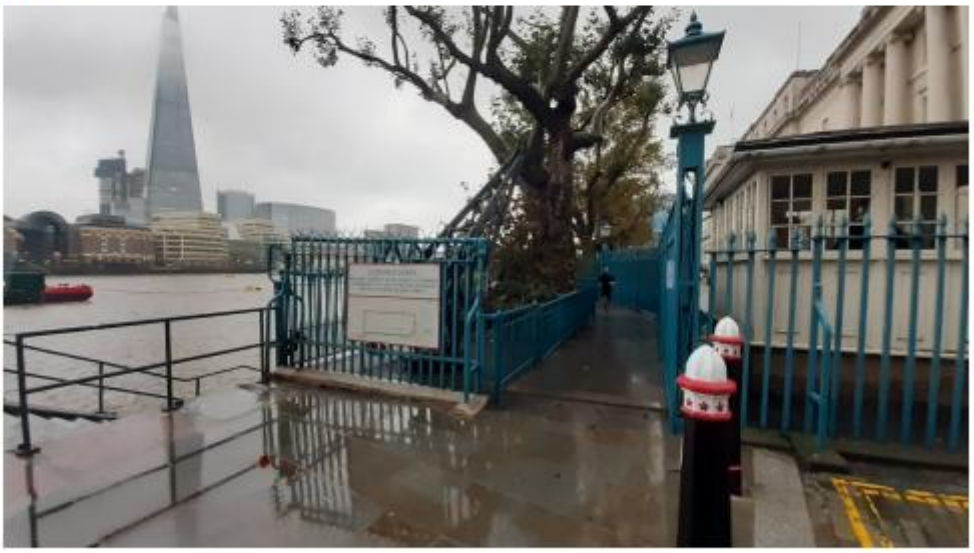


Image 11



Image 12



Image 13



Image 14



Image 15



Image 16



Image 17



Image 18



Image 19



Image 20



Image 21



Image 22

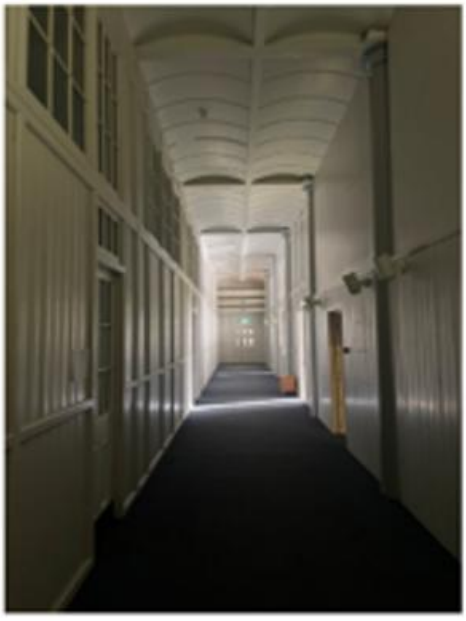


Image 23

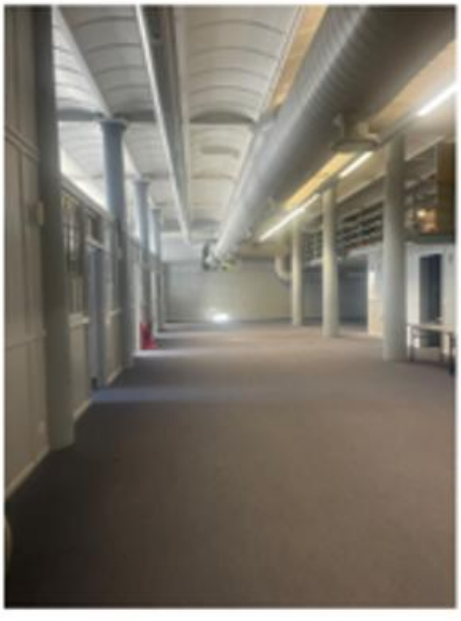


Image 24



Image 25



Image 26



Image 27

Image 1	View from London Bridge
Image 2	Internal office corridor
Image 3	Flood wall and existing plant
Image 4	Main entrance lobby off Lower Thames Street
Image 5	Looking west from the existing car park
Image 6	Looking south towards Custom House from Lower Thames Street
Image 7	View west from existing roof top with view of the Monument
Image 8	Existing servicing ramp and basement entrance
Image 9	View from the Thames Path looking west
Image 10	View from the Thames Path looking towards the eastern block and Old Billingsgate Walk
Image 11	View of the railings along the Thames Path
Image 12	View south along Old Billingsgate Walk
Image 13	View south along existing carriageway within Custom House site boundary adjacent to Old Billingsgate
Image 14	View from Lower Thames Street looking south
Image 15	View of the Thames Path, Grade II* listed River Wall, Stairs and Crane
Image 16	Central Block view from within the Car Park
Image 17	Façade detail
Image 18	Existing extension into the car park from the West Block
Image 19	Entrances off of land adjacent to Old Billingsgate
Image 20	The Long Room
Image 21	The Robing Room
Image 22	The Crane
Image 23	The King’s Warehouse
Image 24	The King’s Warehouse
Image 25	The Central Courtyards
Image 26	The Central Courtyards
Image 27	The Central Courtyards

Application Cover Sheet

<table>
<tr><th>TOPIC</th><th colspan="4">INFORMATION</th></tr>
<tr><td>1. HEIGHT</td><td colspan="2">EXISTING</td><td colspan="2">PROPOSED</td></tr>
<tr><td></td><td colspan="2"></td><td colspan="2">32.777m AOD

(whilst there is additonal height proposed on the East and West Wings at roof level to accommoate roof level plant equipmenty, this does not change the existing maximum height of the building.

The current ground floor is at 6.775m AOD</td></tr>
<tr><td rowspan="7">2. FLOORSPACE GIA (SQM)*

*Rounded to the nearest decimal place</td><td colspan="2">EXISTING</td><td colspan="2">PROPOSED</td></tr>
<tr><td>USE</td><td>FLOORSPACE</td><td colspan="2">FLOORSPACE</td></tr>
<tr><td>Use Class E (g) (i) (Office)</td><td>19,794</td><td colspan="2">0</td></tr>
<tr><td>Use Class C1 (Hotel)</td><td>0</td><td colspan="2">17,745</td></tr>
<tr><td>Use Class E (d) (Indoor sport, recreation or fitness)</td><td>0</td><td colspan="2">1,599</td></tr>
<tr><td>Sui Generis</td><td>0</td><td colspan="2">1,993</td></tr>
<tr><td>TOTAL</td><td>19,794</td><td colspan="2">21,276</td></tr>
<tr><td>3. EMPLOYMENT NUMBERS</td><td colspan="2">EXISTING</td><td colspan="2">PROPOSED</td></tr>
<tr><td colspan="2">• 0 (as the building has been vacant since 2021).</td><td colspan="2">• 200 (no.) Full Time Equivalent
• 80 (no.) Part Time Employees</td></tr>
<tr><td rowspan="3">4. VEHICLE/CYCLE PARKING</td><td colspan="2">EXISTING</td><td colspan="2">PROPOSED</td></tr>
<tr><td colspan="4">Cycle Parking</td></tr>
<tr><td>Cycle Parking Typology</td><td>Quantum</td><td>Cycle Parking Typology</td><td>Quantum</td></tr>
<tr><td>Long Stay Cycle Parking</td><td>0</td><td>Long Stay Cycle Parking</td><td>19 (no.) spaces
Total: 19 (no.) spaces</td></tr>
</table>

	Short Stay Cycle Spaces	0	Short Stay Cycle Spaces	• 4 (no.) spaces within the basement long-stay storage for hotel use • 60 (no.) spaces available between Billingsgate Walk and Water Lane • 18 (no.) to be re-provided as a cycle infrastructure contribution (payment in lieu) Total: 82 (no.) spaces
	Car Parking			
	Car Parking Typology	Quantum	Car Parking Typology	Quantum
	Standard Car Parking	• Circa. 75 (no.) spaces in the riverfront car park; and • 15 (no.) spaces in the basement	Standard Car Parking	0 (no.)
	Blue Badge Bay	2 (no.)	Blue Badge Bay	2 (no.) to be located on Water Lane

5. HIGHWAY LOSS / GAIN	Proposals include the creation of a new on-street inset lay-by on Lower Thames Street, to facilitate taxi and vehicle drop-off for hotel guests and the public. The adjacent footways will accommodate an inset lay-by but will remain sufficiently wide for expected pedestrian flows. These arrangements will form part of a detailed design, part of the Section 278 Agreement with TFL. The footway along the eastern building boundary will be widened and extended southwards to form a continuous pedestrian route, replacing the existing vehicle crossover into the Quayside car park.		
6. PUBLIC REALM	The Proposed Development delivers public realm enhancements on all sides of Custom House, including Lower Thames Street, Water Lane, and the quayside. These improvements will enhance the setting of the historic building through the use of high-quality materials, provision of seating, and lighting and planting enhancements. All spaces will remain accessible to the public 24 hours a day - 365 days a year. Removal of existing railings will make the quayside fully accessible to the public and provide approximately 2400m2 of new public space adjacent to the Thames. Proposals will improve movement and accessibility across the site with accessible routes created connecting Lower Thames Street with the river on Water Lane and at the western end of the building, and an improved ramp adjacent to Old Billingsgate will ease movement along the Thames Path.		
7. TREES	EXISTING	REMOVED	TREES TO BE PLANTED
	15 (no.) trees	0 (no.) trees	0 (no.) trees
8. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED	
	48 deliveries per day could be generated, with the existing site having no requirement for consolidation.	A cap of 28 vehicles per day (56 two-way movements)	
9. SERVICING HOURS	Servicing and Delivery will be carried out during the working day (Monday-Saturday), outside of the CoL peak restrictions of 07:00-10:00, 12:00-14:00 and 16:00-19:00 on the basis that overnight servicing is permitted. No deliveries permitted on Sunday.		
10. RETAINED FABRIC	Substructure- **80%** (by mass) Superstructure- **75%** (by mass) Façade- **84%** (by m2)		
11. OPERATIONAL CARBON EMISSION SAVINGS	**33.5%** below the baseline building performance (Part L 2021) (GLA requirement: **35%**)		
12. OPERATIONAL CARBON EMISSIONS	Total operational carbon emissions: **6,844,922kgCO2e** Total operational carbon emissions per square metre: **323kg CO2e/m2 GIA**		

13. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS Upfront embodied carbon emissions (A1 – A5): **272.672** (GLA benchmark: **< 850)** (GLA aspirational**: < 500)** Embodied carbon (A – C *excluding B6 & B7): **592.764** (GLA benchmark: **< 1200**) (GLA aspirational: **< 800**)
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**
15. TARGET BREEAM RATING	Targeting BREEAM "**Excellent**" rating
16. URBAN GREENING FACTOR ("UGF")	**0.18**
17. BIODIVERSITY NET GAIN ("BNG")	The Proposed Development would be exempt from the mandatory 10% biodiversity net gain pursuant to Regulation 4 (de minimis) of the Biodiversity Gain Requirements (Exemptions) Regulations 2024. This is as the proposals would have no impact on any priority habitat and the biodiversity value of the site as-existing would not be impacted by the proposed development.
18. AIR QUALITY	The proposed development is Air Quality Neutral.

Main Report

Site and Surroundings

1. The site of Custom House is located on the north bank of the River Thames, bound by Lower Thames Street to the north, Water Lane to the east, Old Billingsgate and Old Billingsgate Walk to the west and the River Thames to the south.

2. The site is approximately 0.99 hectares in area and contains the Grade I listed Custom House (including the Quay) and the Grade II* listed River Wall, Stairs and Cranes.

3. Custom House comprises of 19,794sqm GIA of office floor space (Use Class E (g) (i)). The existing building was most recently occupied by Her Majesty's Revenue and Customs (HMRC), who vacated the site in 2021. It is arranged over basement, ground and first to third floors. The building is internally divided into three distinct blocks, (i) the central block, (ii) the eastern wing, and (iii) the western wing.

4. The quayside area between the building and the Riverside Walkway, has most recently been used as private car parking area for the occupiers of the building.

5. The Riverside Walkway runs along the southern edge of the site, immediately adjacent to the River Wall and provides a continuous connection between the walkway at Sugar Quay to the east and Old Billingsgate Market to the west. Public access to the Riverside Walkway is provided by the section of public highway running adjacent to Water Lane from Lower Thames Street.

6. The application site is situated within Flood Zone 3 as defined by the Environment Agency's flood map.

7. Lower Thames Street forms part of the Transport for London Road Network (TLRN) for which Transport for London (TfL) is the highway authority.

8. The site is well connected to public transport. It has a PTAL rating of 6b (excellent) and is located approximately 350m southeast of Monument, 400m southwest of Tower Hill Underground Stations and 500m northeast of London Bridge Underground and National Rail stations. There are several bus stops within walking distance of the application site.

9. The application site is located within the Central Activities Zone (CAZ) as identified by the London Plan. The application site is situated within the Thames Policy Area in both the Local Plan 2015 and emerging City Plan 2040. In the emerging City Plan 2040, the application site is situated within the Pool of London Key Area of Change identified by policy S19.

10. The application site is adjacent to a Site of Metropolitan Importance for Nature Conservation.

11. The application site is not situated within a conservation area. The Eastcheap Conservation Area lies to the north of the application site, on the opposite side of Lower Thames Street. The Trinity Square Conservation Area is to the northwest of the site. The Tower of London Conservation Area is to the west of the site; this is within Tower Hamlets. On the south side of the river are the Tower Bridge and Tooley Street Conservation Areas in the London Borough of Southwark.

12. The application site is situated within Strategic Views of the London Views Management Framework (LVMF), the relevant views are set out and discussed in the Views section of this report.

13. The site also falls within the Monument Views (of and from) as identified in the Protected Views SPD.

14. The site is in the wider setting of the Tower of London World Heritage Site.

15. There are a number of heritage assets within the vicinity of the application site, including listed buildings and Scheduled Ancient Monuments; these are set out and discussed in the Design and Heritage Section of this report.

16. There are several residential properties within the vicinity of the application site, with the closest being Sugar Quay immediately to east.

Planning History

17. The most substantive recent planning history relates to planning (20/00631/FULMAJ) and Listed Building Consent (20/00632/LBC) applications which were submitted in September 2020 for

Planning Permission

Change of use from office to hotel with ground floor internal north/south public route (sui generis), ground floor museum (Class F1 (c)), flexible ground floor and roof level retail/restaurant/bar floorspace and public viewing terrace (Classes E & Sui Generis (Drinking Establishment)), lower ground floor leisure facilities (Class E) and new riverfront public realm including Water Lane, Old Billingsgate Walk and Lower Thames Street (Sui Generis / C1 Hotel); works of demolition, alteration, extension and refurbishment: i.) removal of railings around riverside car park, (ii) demolition and re-building behind the retained facade of the 1960s East Block iii) demolition of 1960s East Block roof and alteration of West Block roof to erect 2 x two storey extensions to provide hotel rooms, plant and roof level retail; iv) demolition of Centre Block ground floor external stairs and replacement with new river terraces, stairs and step free ramped access (south elevation); v) alterations to and raising of the flood defence wall; vi.) facade alterations and associated works to create a first floor

terrace at on the Centre Block (south elevation) and reinstated door and new ramped entrance access to West Block (west elevation); vii.) removal of railings on Lower Thames Street and alterations to Centre Block entrance on Lower Thames Street providing step free access; viii.) works to the river wall ix) other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a vehicular drop off on Lower Thames Street.
The Proposed Development does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated.

Listed Building Consent

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

18. Appeals against non-determination were submitted in August 2021. As result of the non-determination appeals, Officers presented 13 putative reasons (across the two applications) for refusal to Planning and Transportation Committee on the 26 October 2021. The putative reasons are attached to this report in Appendix A.

19. The appeals were considered at Public Inquiry between the 25 January and 17 February 2022 under appeal references APP/K5030/W/21/3281630 and

APP/K5030/Y/21/3281258. Both appeals were dismissed by the Planning Inspector in the appeal decision dated 30 June 2022.

20. It is noted that the application descriptions as set out above were amended through the appeal process and that the Georgian Group were a Rule 6(6) Party during the appeal.

21. Overall, the appeals were dismissed as the inspector concluded that the severe but less than substantial heritage harm identified would not be outweighed by the public benefits of the proposals.

22. Other relevant planning history is set out below.

23. The building underwent a comprehensive and largely sensitive refurbishment in the early 1990s, carried out by HMRC, which included removal and rationalisation of mechanical services in the building, installation of a new staircase in the west wing lightwell and part mezzanine level in the Queens Warehouse, both of which were regarded as reversible installations, reinstatement and re-use of original features, and repairs and redecoration based on historical research of original finishes. The works did not significantly alter the plan form of the West Wing and the Centre Block.

24. There have been numerous minor applications since then for works largely associated with the day-to-day functioning of the building.

25. In 1999 planning permission and Listed Building Consent were granted for works associated with the creation of a public pedestrian walkway along the riverside edge of the Quay, which included the erection of railings between the Walkway and the remaining Quayside which formed part of the security requirements of the HMRC.

26. On 15 December 2020, Listed Building Consent (20/00672/LBC) was grated for the removal of four War Memorials from the ground floor entrance hall.

Proposals

27. Two applications have been submitted consisting of one planning application and one Listed Building Consent application.

28. Planning permission is sought under application 25/00270/FULMAJ for:

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.

29. Listed Building Consent is sought under application 25/00271/LBC for:

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.

30. Consideration has been given to the Planning Inspectors report(s) (APP/K5030/W/21/3281630 and APP/K5030/Y/21/3281258) which sets out why the appeals were dismissed. The key amendments between the current applications and the scheme dismissed at appeal are:

- The two-storey roof extension to the East and West Wings is no longer proposed. On this application no roof extension is proposed except for rooftop plant and the associated screen.
- The roof to the West Wing courtyard in no longer proposed.
- The level of subdivision to the plan from of the West and Central wings is greatly reduced as the proposed development seeks to retain majority of the existing plan form
- The number of hotel rooms is reduced from 202 to 179.

31. Officers are of the view that the current proposals are materially different from the proposals that were dismissed at appeal (APP/K5030/W/21/3281630 and APP/K5030/Y/21/3281258) and having taken into account the previous reasons for refusal considered by the Inspector and the appeal decisions, are now recommending that planning permission and listed building consent are granted.

Consultations

Statement of Community Involvement

32. The Applicants have submitted a Statement of Community Involvement (SCI) prepared by Concilio dated February 2025, outlining their engagement with stakeholders.

33. Two phases of public consultation were held in May 2024 and October 2024. The submitted SCI sets out that the first phase of engagement sought to gather feedback on the emerging vision for the site and to ask for input and suggestions on aspects such as public realm and cultural offer. The second phase of engagement looked to share more detailed, updated proposals and seek feedback on this. The SCI sets out in addition; the applicant has also conducted a comprehensive programme of ongoing engagement with key stakeholders and neighbours.

First Phase of Engagement

34. The applicants first phase of engagement, which took place between 7th May 2024 and 22nd May 2024, included:

- Consultation flyers were distributed to over 1000 local addresses.
- A dedicated consultation website which was visited by 6,653 unique visitors by the end of the second phase of engagement. The website included a survey which has 226 responses by the end of the second phase of engagement.
- Social media adverts had a reach of 106,557, with 2,105 click throughs to the website.
- A street stall located outside of Monument Station on the 7th May 2024 and a street stall located at St Dunstan in the East Church Garden on the 20th May 2024. 52 people were engaged with over the two sessions.
- A public exhibition held at St Margaret Pattens Church, Rood Lane, on the 16th May 2024. This was attended by 12 people

Second Phase of Engagement

35. The applicants second phase of engagement, which took place between 9th October 2024 and 31st October 2024, included:

- Consultation flyers were distributed to over 1000 local addresses.
- A dedicated consultation website which was visited by 6,653 unique visitors by the end of the second phase of engagement. The website included a survey which has 226 responses by the end of the second phase of engagement.
- Social media adverts had a reach of 167,144 with 3,177 click throughs to the website.
- A street stall located on the Thames Path in front of Custom House on the 23rd October 204 and the 30th October 204. 36 people were engaged with over the two sessions
- Two public exhibitions were held at Custom House on the 21st October and 23rd October 2024. These were attended by 98 people.

Statutory Consultation

36. Following receipt of the planning permission and Listed Building Consent applications by the Local Planning Authority in February 2025, they have been advertised in site and in the press. Nearby residential occupiers were also notified directly by letter. The application has been consulted upon twice in the following ways:

- On the validation of the applications in April 2025 for a period of 21 days
- Upon the receipt of revised plans in July 2025 for a period of 21 days

37. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses are set out below.

Consultation Responses	
Greater London Authority (GLA)	The GLA confirmed that the application is not referrable. Officer Response: Noted.
District Surveyors – Fire	Confirmed no comments to make and policies D5 and D12 have been met. Officer Response: Noted.
City Operations	The following informative was requested to be incorporated: Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals for the above planning application, need to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being; Any building proposal which includes catering facilities will be required to be constructed with adequate grease traps to the satisfaction of Thames Water utilities ltd or their contractors. Officer Response: This informative has been included.
The City of London Archaeological Trust (CoLAT)	We have a comment to make about the provision of archaeological mitigation. The proposed demolition plan of the basement shows widespread excavations for services throughout, and there is proposed to be a pool in the central section. These intrusions will remove previous strata, and while some of the layers to be removed will be from the periods of building of the 19th-century buildings (and even so not without interest), there may well be undisturbed archaeological deposits below dating from the period of the Roman quay and riverside wall, together with medieval foundations. As of today, there does not seem to be any archaeological assessment or evaluation of intended works within the building (the existing assessment is of the quay outside). We recommend as a matter of

	urgency that you ask for an archaeological assessment of the works in the basement, which should have accompanied the application. Officer Response: These matters are addressed in full in the Archaeology section of this report.
Environmental Health	No objection subject to the imposition of conditions. Officer Response: The requested conditions are included in the conditions schedule.
Tower Hamlets	Confirmed that they do not wish to make any comments in response to this application. Officer Response: Noted.
City Gardens	No objection subject to the imposition of conditions. Officer Response: The requested conditions are included in the conditions schedule.
Historic England – GLAAS	Assessment of Significance and Impact The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks. An archaeological desk-based assessment (Mills Whipp 2025) and archaeological evaluation report (MOLA 2025) accompanied the planning application. The desk-based assessment highlighted that the majority of the site is located on land reclaimed from the river. The original Roman masonry riverfront wall is likely to have been located running east-west through the north of the site. This wall has recently been Scheduled where it was found directly adjacent to the site at Sugar Quay and if remains of the wall survive on the site they would be regarded as being of national significance. Other archaeological remains likely to be present on the site comprise medieval and post-medieval timber waterfronts. The

	desk-based assessment also highlights that geotechnical, works have shown the eastern part current Custom House building was extensively underpinned in the earlier 19th century and it is anticipated that the raft extends under the central and western parts of the site, although no investigations have taken place in these areas. Archaeological watching briefs within the building have identified an extensive concrete raft of 19th century date is present beneath the structure which is likely to have removed all archaeology within the building's footprint. The archaeological evaluation was focused to the south of the building, within areas of proposed impact from the new development. The evaluation identified two earlier river walls of 19th century date and a cobbled surface. Archaeology pre-dating the 19th century was not identified although the trenches were not excavated down to natural ground due to site restrictions. Within the current Custom House, proposed impacts comprise a new swimming pool and investigations around current foundations which may require some demolition and strengthening. The basement floor slab and some of the concrete raft may also need to be removed. The depth of the new swimming pool is currently unknown. However, the underpinning of the 19th century is believed to be so extensive that the new development is likely to have little archaeological impact. The swimming pool is located away from the likely location of the masonry Roman river wall. Outside the current building, the main potential impacts on archaeology relate to a new ramp and basement extension along the southern frontage of the building. Excavations of up to 4.5m in depth will be required here and a secant piled wall is also proposed. The archaeological evaluation has established that although archaeological remains of 19th century date are present in this area, they are of local significance. If medieval or post-medieval waterfronts survive in this area below the 19th century material, the harm to them can also be mitigated through archaeological excavation and recording.

	It is therefore recommended that an archaeological watching brief is carried out on below ground excavations within the Custom House and that the archaeological remains to the south of the building are mitigated by archaeological excavation and recording in advance of development. There is a low potential for the Roman riverfront wall to survive on the site, given previous likely levels of truncation and the location of proposed impacts within the building but foundation designs should allow for the preservation of the wall, should it be encountered during the watching brief. A Cultural Strategy has also been provided with the planning application. The Cultural Strategy includes a number of proposals which relate to the history of the Custom House and its environs and proposes much greater public access to the building and waterfront. The proposals in the Cultural Strategy are welcomed and can potentially be enhanced by the results of the archaeological excavation. The archaeological evaluation revealed a number of features which contained material which could be salvaged and reused on the site. Materials include a former cobbled surface and the masonry remains of two earlier waterfront walls which were constructed from high quality materials. The remains of the river walls are likely to be extensive and we would therefore recommend salvage of the materials and reuse on the site where appropriate. The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. I therefore recommend attaching two conditions. Officer Response: The requested conditions are included in the conditions schedule.
Environment Agency	No objection to the proposals subject to the inclusion of two planning conditions in relation to: 1. Detailed Design of Flood Defences 2. Schemes to be agreed- Flood Gate Operational Contingency Plan Officer Response: The requested conditions are included in the conditions schedule.

Georgian Group	Letter dated 28th April 2025 Summary The Georgian Group has been involved in pre-application discussions with the applicant, and it is clear from the submitted documentation that our advice has been carefully considered. The scheme has the potential to deliver both public and heritage benefits, including enabling public access to this exceptional building. While the proposed conversion from office to hotel use would result in less than substantial harm to the building's significance, such alterations should be assessed in the context of the change of use and weighed against the associated public and heritage benefits. The Group understands that further information will emerge once opening up works begin, which may necessitate a variation in approach. It is therefore important to agree on a clear set of guiding principles to inform the works. The principles outlined in the documentation should form the basis for a set of conditions to be agreed upon prior to determination. These conditions should specifically address internal doors, fanlights, windows, and matters relating to the servicing strategy, as well as the potential impact on the building's structure. Such conditions will be integral to ensuring minimal variation in the approved works. Additionally, assurances should be sought regarding the viability of the scheme, as outlined in the following text. The Georgian Group does not object to the applications on heritage grounds. Your local authority should ensure that the necessary agreements are in place to provide the proposed level of public access. Significance of Heritage Assets A Custom House has stood near the application site since the 14th century. In 1382, John Churchman cleared and redeveloped a site to the east of the current building - an area then known as Wool Quay, later renamed Custom House Quay. This early structure was either enlarged or rebuilt in 1559 but was ultimately destroyed in the Great Fire of London.

	Its replacement, designed by Christopher Wren and constructed between 1669 and 1671, introduced a plan form that would go on to influence the design of later Custom Houses. Following a fire in 1715, Thomas Ripley was commissioned to rebuild the Custom House. He followed a design similar to Wren's but added an additional storey. Ripley's building ultimately met the same fate as its predecessors and was destroyed by fire in 1814. Even before this, the increasing volume of trade entering London had led to the decision that a new, larger building was needed. David Laing, in his role as Surveyor to the Customs, designed the replacement on a new site located to the west of the former building. However, he soon came under scrutiny when subsidence caused parts of the central block to collapse in 1824-25. In response, Robert Smirke was appointed to rectify the structural issues. Renowned for his expertise in such matters, Smirke introduced a number of innovative techniques for the time, including the use of concrete for the foundations and iron plates for fireproofing. Smirke also redesigned Laing's Long Room and the southern quayside elevation, adding an applied portico. Internally, he made only minor alterations to the western block, largely preserving Laing's original layout. Today, the building comprises three distinct sections: the west wing, which reflects Laing's original scheme; Smirke's reconstructed central block; and the eastern wing, rebuilt between 1962 and 1966 after suffering damage during the Blitz. Custom House is of exceptional architectural, artistic, and historic significance and possesses considerable archaeological and evidential value. The surviving plan of Laing's block represents an important early example of purpose-built office development in the City of London. His use of borrowed light in the western block - achieved through the internal courtyard and decorative internal fanlights - is of note and reflects the influence of John Soane, to whom Laing was articled in 1790. Smirke's structural innovations further enhance the significance of the building.

	The grade II* listed river wall, stairs and cranes are situated to the south of the application site. They possess high levels of architectural, historic and technological interest which is set out clearly within the listing entry for the asset. Of particular note is the group value with the Custom House. This section is not an exhaustive account of all elements contributing to the building's significance. Throughout the pre-application discussions, we have highlighted key areas of interest, including internal elements. Proposals The application for planning permission relates to the change of use of the existing building from office to a hotel-led mixed-use development. The proposed scheme will comprise a hotel, a basement-level spa and health facility, and a ground floor cafe , gallery, and events space. The application also includes the implementation of a public realm scheme along the existing quayside, with access to the building provided via a newly proposed stair and ramp addition, which will also create two terraces on the southern side of the building. A separate listed building consent application has been submitted for internal and external alterations associated with the proposed change of use. A full description of the proposed works can be found on the City of London Planning Portal. Proposals and their impacts *Quayside, Ramps and Terrace* The proposals include the introduction of two ramps extending east and west from the central entrance point leading into the King's Warehouse. Steps descending from the entrance will be integrated into the ramp design, with newly formed terraces situated on either side of the entrance. This intervention will require the removal of the existing steps up to the King's Warehouse, which date from Smirke's alterations to the building. While their removal would result in a degree of harm to the building's significance, it should be considered in the context of establishing a new use for the building.

	The Group has been engaged in pre-application discussions with the applicant and is satisfied that the proposed ramps and steps are subservient in scale and architectural character to the host building. Additional entry points into the King's Warehouse and west wing will be created from the two terraces, necessitating the removal of historic fabric. The Group is satisfied that the detailing of these interventions will mitigate the impact on the heritage asset. Enhancement works will also be carried out to the southern quayside elevation of the building, including the removal of the east wing ramp and its replacement with a vehicle lift. This alteration is considered a heritage benefit, as it restores the east wing elevation closer to its historic appearance. According to the application documentation, the quayside will be accessible to the public seven days a week, 24 hours a day. This should be recognised as an important public benefit arising from the proposals. *West Wing* The surviving planform within the west wing is a significant contributing factor to the exceptional interest associated with the building. Key spaces within the west wing include the Robing Room, the Tidewaiters' Room, and the suite of rooms in the southeast corner associated with the historic Landing Surveyors' Department. Retaining the proportions of these rooms and their architectural detailing is of the utmost importance. The applicant has adopted an innovative approach to accommodating and concealing the necessary servicing required for the introduction of hotel suites within the west wing. The Group is satisfied that the proportions and spatial qualities of the rooms will remain appreciable following the introduction of the service risers. The risers will align with the existing room datum and be set back from the existing historic fabric to minimise their visual impact. The proposals also include the reinstatement of the historic proportions of the west wing lightwell, which represents a notable heritage benefit. Furthermore, public access will be introduced to several key rooms

	within the west wing, which should also be considered a heritage benefit arising from the scheme. *Central Block/ Long Room/ King's Warehouse* The principal alteration to the central block of the building involves the creation of a terrace within the applied portico. The Group participated in pre-application discussions with the applicant regarding this intervention, during which it was agreed that lowering five window cills on the southern elevation of the Long Room would allow the external primacy of the portico to be preserved. In contrast, lowering only three cills would have disrupted the rhythm and symmetry of the southern elevation. The creation of the terrace should be understood in the context of the building's proposed new use. The Group is satisfied that the harm caused by lowering five cills can be mitigated through appropriate detailing and notes that the architects have undertaken similar interventions successfully elsewhere. In the northern section of the central block, it is proposed to introduce additional lift and stair access, which will require the removal of historic fabric and the penetration of brick vaulting. This intervention would result in harm to the building's significance. Your local authority should be assured that the structural implications of removing the vaults are fully understood before work commences. The reinstatement of the Long Room lobby to its historic proportions would represent a heritage benefit, reintroducing the original circulation route from the ground floor to the Long Room. This experience would be further enhanced by the reopening of the third entrance door into the Long Room and the reinstatement of a lightwell to the east wing, allowing natural light to enter through the high-level window into the Long Room. *Servicing* The servicing strategy has been developed to minimise the presence of heavy and intrusive plant equipment within the west wing and central block. This approach is to be encouraged, although it has necessitated a slight raising of the east wing roof. While the applicant has designed a pitched

	enclosure to help mitigate the visual impact, it does not eliminate the impact entirely, and the resulting alteration to the east wing roofline would cause a degree of harm to the building's significance. This harm should be considered in the context of the overall servicing strategy, which has prioritised the avoidance of placing large-scale plant within the west and central blocks. It is also proposed to remove sections of the west wing roof to accommodate servicing, which would similarly cause harm to the building's significance. This impact should be weighed against the wider benefits of the scheme. The introduction of service risers within rooms in the west wing has been addressed in the preceding sections. *Windows & Doors* As a result of the proposed change of use, upgrading works to internal doors and fanlights will be required to meet fire safety standards. An overarching strategy for addressing these requirements has been outlined within the application documents, which state that the final design and specification will be developed at the next stage. It is recommended that the final details be secured by condition, with the Group consulted on their development. This recommendation also applies to the proposed locations of monolaminate and slimline double-glazed units, which should likewise be subject to an appropriate planning condition. The Richard Griffiths Condition Survey and Gazetteer will be a valuable resource in guiding the appropriate locations for these alterations. *Public and Heritage Benefits* The proposed scheme has the potential to deliver a number of public and heritage benefits, several of which have been referenced in the text above. These benefits have also been clearly outlined within the application documentation, which the Group acknowledges. *Viability* Montagu Evans has produced a viability assessment, and Savills has provided a market

	commentary. However, these documents assess only the demand and viability of the existing office use, rather than that of the proposed hotel use. They have been submitted to justify a departure from City Plan policy, which seeks to protect existing office floorspace. Notably, there is no assessment of the viability of the proposed hotel-led scheme itself. Your local authority should be satisfied that, in the event consent is granted, the scheme can be delivered as proposed - without the need for further intrusive works at a later stage to ensure its viability. *River Wall, Stairs and Cranes* The introduction of new terraces, ramps, and steps leading up to the King's Warehouse would impact the group value between the River Wall, Stairs and Cranes, and the Custom House. However, certain elements of the scheme would serve to enhance the significance of the River Wall, Stairs, and Cranes. These positive works include the removal of the existing railings and steel balustrade that currently run the length of the wall, as well as the repositioning of one of the historic cranes to its presumed original location in front of the building. This intervention would strengthen the historic relationship between the quay and the building. Legislation, Policy and Guidance Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it a statutory duty for the decision maker when considering whether to grant listed building consent to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Section 66(1) of the Act relates to applications for planning permission where it affects a listed building or its setting. It makes it statutory duty for decision makers to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which it possesses.

	The National Planning Policy Framework (NPPF) sets out guidance on how the statutory duty within the Planning (Listed Buildings and Conservation Areas) Act 1990 is to be carried out. Paragraph 212 states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 213 states that 'any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. Planning practice guidance set out by the government requires any harm identified to be either classified as less than substantial or substantial harm. If the harm is identified as less than substantial, then in line with paragraph 215 of the NPPF this harm should be weighed against the public benefits associated with the proposed scheme. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise'. London Plan Policy HC1 states 'development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.' The City of London's Local Plan Core Strategic Policy CS12 sets out the City's objective to 'conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors'. Policy DM 12.1 Managing change affecting all heritage assets and spaces sets out the City of London's intention to 'sustain and enhance heritage assets, their settings and significance'. Policy DM 12.3 Listed Buildings states that the City of London will only 'grant consent for the alteration or

	change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting'. Recommendation The Georgian Group has no objection to the applications on heritage grounds. Before determining these applications, your local authority should agree on draft conditions to address the areas highlighted in this letter. This includes works to internal doors and fanlights, as well as issues relating to the provision of services and the potential impact on the structure of the building. The success of the scheme will depend on the delivery of the proposed public and heritage benefits. Your local authority should ensure that the necessary agreements are in place, which will ensure that public access, to the extent proposed is provided. The success of the scheme will depend on the delivery of the proposed public and heritage benefits. Your local authority should ensure that the necessary agreements are in place, which will ensure that public access, to the extent proposed is provided. Officer Response: Noted. Where this representation refers to the principle of development, that is addressed in the relevant section of this report. Additionally, details and materials would be subject to condition where appropriate and relevant, and as set out in the appendices to this report. Letter dated 22nd August 2025 Revised Proposals The revised drawings relate to a change in the type of slate proposed for the eastern roof extension. The previous proposals specified slates that matched those on the existing eastern pitched roof and the western roofscape. Four options have been presented in the East Wing Roof Study Document, with Option 1 being the applicant's preferred choice. Option 1 proposes a 'light slate' that differs in colour

	from the slates used on both the western roofscape and the existing eastern roofscape. The Group understands that the proposed slab beneath the plant enclosure is to be lowered by 340mm in order to maintain the existing height of the plant enclosure. This adjustment will reduce the overall height of the eastern roof extension. The Georgian Group's Advice The Group has reviewed the additional documentation submitted and, while we welcome the reduction in the height of the plant enclosure on the eastern wing, we would favour a slate colour that matches the western roofscape and the existing eastern pitched roof. The East Wing Roof Study Document sets out the respective pros and cons of adopting either the lighter slate or the existing slate colour. In our view, the benefits of matching the existing slate outweigh those of the lighter option, particularly in terms of appearance and environmental considerations. Using slates that match the existing would maintain the building's visual uniformity, preserve its tripartite arrangement and follow the existing character of the building. In contrast, introducing a lighter slate on the eastern roof extension would disrupt this uniformity and increase the visibility of the extension - ultimately to the detriment of views towards the grand southern elevation, as well as views along Lower Thames Street. Recommendation After reviewing the additional documentation, the Group recommends that the slate colour selected should match both the western roofscape and the existing eastern roofscape. This approach preserves the character and uniformity of the building and ensures that the primacy of the central block is maintained in views towards the grand southern elevation. Officer Response: These comments are addressed in the Design and Heritage section of this report.

City of London Police – Counter Terrorism Security Advisor (CTSA)	Advise was provided to the applicant which is sensitive in nature and the relevant conditions are included in the conditions schedule.
Historic Buildings and Places	Thank you for notifying HB&P of the above application for listed building consent. HB&P strongly objected to the previous scheme for a hotel conversion due to the significant level of harm that would have arisen as a result of the alterations proposed. The much revised scheme that is subject to the current application was discussed at our most recent Casework Committee meeting and the Trustees are content that the most harmful elements are no longer included and the level of change now proposed is acceptable, given the associated public and heritage benefits that will be achieved. This is particularly relevant for Laing's historic west wing and Smirk's rebuilt Long Room and the King's Warehouse in the central section. The details and materials, etc. will need to be carefully conditioned and HB&P are therefore content to defer to the advice of Council's conservation team for all other conservation issues. Officer Response: Noted, and details and materials would be subject to condition where appropriate and relevant, and as set out in the appendices to this report.
SAVE	SAVE Britain's Heritage writes to support the above planning and listed building consent applications and wishes to offer further comments in relation to the proposed public access for this exceptionally important public building. SAVE is grateful for the opportunity to have been consulted on several occasions as this scheme developed. We are pleased that the current proposals are much improved from the plans refused at public inquiry in 2022. Public access to the interior (including the ground floor and Long Room) and to the Quayside Terrace have been a paramount concern for SAVE since 2020 when the previous plans were submitted. In this regard, the public access proposed by the current scheme is a step

	forward, but we consider that these commitments need to be enforceable through a S.106 agreement. Proposals The above planning application proposes a change of use of the existing building from office to hotel-led mixed use, and the implementation of a new public realm scheme to the existing quayside. Public spaces within the building are proposed to include a north/south route, gallery, cafe and events space. The associated listed building consent application proposes the alteration, extension and refurbishment to the exterior and interior of all three wings of Custom House to accommodate a change of use. SAVE submitted a detailed statement against the previous scheme to the public inquiry in 2022, which majored on our concern that public access to the Custom House is critical to protecting its historic significance and future use. The plans were refused by the Planning Inspectorate on heritage and planning policy grounds. Significance SAVE has submitted extensive evidence in relation to the previous planning application (20/00631/FULMAJ) and listed building consent application (20/00632/LBC) for Custom House setting out the very high significance of this grade I listed building (LEN 1359193). The exceptional significance of Custom House is widely acknowledged, even though it remains comparatively little known to the general public because it has been largely closed to the public in recent decades. We wish to reiterate that the historic function and public accessibility of Custom House makes a crucial contribution towards its heritage significance, as a public building that has shaped the development of the nation for hundreds of years. Through its historic role as a venue for traders to gather and the interested public to meet, to conduct business and transactions with government officials, and to exchange news and information, Custom House has played a huge part in the economic development of Britain, even greater than the Royal Exchange. At the heart of this building is the Long Room, which is

	significant for its historic public function as a meeting place. Similarly, the space around the Custom House building, which is crucial to its setting, was originally unfenced and open to the public, to the extent that sentry boxes were installed to control crowd behaviour, and seating was put in by the Metropolitan Public Gardens Association in 1891, followed by tree planting by the Office of Works in 1903. Public Access to the Quayside Terrace We welcome the proposed, unrestricted public access to the quayside, which reflects and understands this space within its historic context and importantly has the potential to create an exciting new public realm for London. We note, as stated in the Cultural Strategy (11 Feb 2025) that “the Custom House quayside will be permanently accessible to the public, 24 hours a day, every day of the year” (p.5). Allowing free public access to the quayside, without barriers or ticketing, to allow and encourage people to use this space, and/or take part in proposed activities such as food markets or small-scale performances is an important public benefit. There is the potential to increase and support use of the Thames Path. To ensure that these significant public benefits are delivered and the quayside becomes a publicly accessible space all year round, we consider it is incumbent on the Local Planning Authority to guarantee this provision through a S.106 agreement. Public Access to the Long Room We support the proposal to allow community groups, charities and cultural organisations to book 24 morning, afternoon or evening slots per year, as set out in the Cultural Strategy. We wish to highlight missing details about booking system, which we consider should be set out in a S.106 agreement, including how a booking system will be run (for example whether this is to be managed by the Friends of Custom House group) and whether these booking slots will be evenly spaced throughout the year. Cultural Strategy

	SAVE welcomes the proposed public benefits of the scheme provided through a variety of cultural spaces, including a ground floor route passing through the lobby, King's Warehouse and portico, and flexible gallery spaces and a cafe in the West Wing. We acknowledge the creation of an operations model to deliver these activities which proposes to establish a Cultural and Community Committee and employ a Curator and Culture and Community Event Officer. We regard it of the upmost important that all public benefits proposed by the scheme are reinforced by a S.106 agreement to ensure the guaranteed delivery of this significant cultural offer. Fabric Alteration On detailed matters relating to the historic fabric, we defer to expert assessment of the Georgian Group. With regard to the West Wing of the Custom House, we support plans to minimise change to the plan form of the original office spaces. We consider this is of paramount importance in order to retain the outstanding significance and rarity of this wing. The West Wing's virtually unaltered surviving layout strongly contributes to the building's significance as a whole. Conclusion SAVE is pleased that the current proposals are much improved from the previous scheme. We support the proposed public access to the ground floor, Long Room and Quayside Terrace. We consider it of paramount importance that these commitments are enforceable through a S.106 agreement. Officer Response: Noted. The conditions recommended are included as an appendix to this report, and public benefits and obligations are addressed in the relevant sections of this report.
Cleansing Services	No objection. Officer Response: Noted.
Southwark Council	No comments. Officer Response: Noted.

Transport for London (TfL)	Memo dated 30th May 2025 The site is bound by St Dunstan's Lane to the north, St Dunstan's Hill to the east, Lower Thames Street to the south, and St Mary at Hill to the west. Lower Thames Street (A3211) forms part of the Transport for London Road Network (TLRN) and TfL is therefore the highway authority. The site has a public transport access level (PTAL) of 6b, on a scale from 0-6b, where 6b is the highest. The site is within walking distance of Fenchurch Street, Tower Hill, Tower Gateway, Bank, London Bridge and Cannon Street, providing access to a wide range of London Underground (LU), London Overground, National Rail, and Docklands Light Railway (DLR) services. The area is also within walking distance of stops for the 15, 48, 521, 21, 141, 17, 149, 43, 344, 40, 47, 133 and 35 bus services. Cycleway 3 runs along Lower Thames Street directly outside the site. The nearest TfL Santander cycle hire docking stations are Lower Thames Street (Monument) - approximately 260m way; Monument Street (Monument) 300m; and Great Tower Street (Monument) 350m. Strategic Highways Improvements The application materials acknowledge severance and permeability issues for pedestrians caused on all sides of the site by the dominance of surrounding highway infrastructure. Despite this, north of the site, only a new lay-by for pick up and drop off by taxis and private hire vehicles has been proposed. It is acknowledged that this reflects a previous approach agreed with TfL for development proposals that were refused and unsuccessfully appealed. TfL previously advised, and maintains, that their support for any new lay-by for any motor vehicles on the TLRN at this location is contingent on the provision by the development of a high-quality package of active travel mitigation to serve it and improve the wider area. This must include both robust and wide-ranging public access provisions for

	the quayside public realm areas proposed, and significant improvement works not only to the south, east and west, but also to Lower Thames Street A3211. Widening of the existing pedestrian crossing at the far western end of Custom House's northern frontage is requested to form part of a section 278 (S278) agreement with TfL in its overall package of works for the TLRN. This must be secured by condition or in the section 106 (S106) agreement. A high-level scope of the agreed works should also be set out clearly in the planning decision. Decluttering the streetscape through removal of any unnecessary signal heads and crossing infrastructure, subject to modelling and engineering feasibility, should also be considered. The submitted RSA for the proposed lay-by on the TLRN has been carried out in accordance with TfL Procedure SQA-0170. Further discussion with TfL on the proposed design is nonetheless strongly advised, especially as crossing improvements need to be added to the overall works package. Vehicular access and parking As mentioned earlier, the site benefits from excellent local public transport and active travel accessibility. The proposals include a new vehicle drop off on Lower Thames Street. This will be 15m long to be able to accommodate a single coach or up to three taxis. Whilst the taxi/coach drop off will represent a significant provision for access to the proposed development by private vehicles, due to the public realm improvements and active travel benefits also proposed at the riverside, on balance this is likely to be acceptable. Step-free access adjacent to the taxi drop-off will clearly be important to consider as taxis provide safe, accessible travel options for those that require it. The design features proposed to enable this should therefore be secured as part of the planning decision. Subject to pedestrian priority and severance north of the site also being addressed and appropriately mitigated by additional strategic highway

	improvements as requested, on balance, the proposed lay-by is acceptable, considering the destination character of the new use proposed, and a lack of step free bus services directly serving the site. Currently, the site's vehicular access is in from Lower Thames Street to the north, the east-west TLRN corridor, to a car park south of the main building which faces the River Thames and River Wall. This riverfront car park currently provides approximately 100 spaces and is controlled by a security check point. Delivery and servicing vehicles currently access via a single width vehicle ramp on the east side of the riverfront car park area down to the basement, where waste is currently stored and collected and there are 15 more sub-surface general car parking spaces. The development proposal is car free except for proposed provision of two Blue Badge spaces on Water Lane. This is welcomed in line with London Plan Policy T6, especially the proposed removal of the existing private riverfront car park to create new public realm. The removal of the existing car park is also welcomed in line with London Plan Policy D8, as it would maximise the contribution that the public realm makes to encourage active travel and ensure travel by car is discouraged. This also supports London Plan Policies T1 (Strategic approach to transport); T2 (Healthy Streets); and T3 (Transport capacity, connectivity and safeguarding). The applicant should demonstrate how the proposed Blue Badge parking spaces will be accessible even when the proposed basement servicing areas are in use. The benches proposed on the journey between the Blue Badge parking and step free building entrances, to enable people with less mobility to stop and rest, are strongly supported. It is welcomed that delivery and servicing activity would no longer occur along Water Lane, in line with London Plan Policy T4 Part F, and further detailed comments on the proposed arrangements for servicing are given below.

	Cycle access, hire and parking Cycle Superhighway 3 (Barking to Lancaster Gate) operates along Lower Thames Street itself, providing direct access for cyclists. Creation of the proposed vehicular lay-by must not have any detrimental impact on cycling journey times or reduce cycle priority. The site also benefits from multiple existing TfL Santander cycle hire docking stations within reasonable walking distance. As a result, it is likely that no financial mitigation for cycle hire is necessary, provided that the walking routes to existing local provision are shown to be high quality in the ATZ assessment of the TA and mitigated with funding from the applicant if necessary. Long-stay cycle parking is proposed to be located at basement level within a sheltered and secure cycle store. This would provide 24 spaces, including 4 short-stay spaces for hotel use, with two-tier stands for the majority and 2 spaces provided as Sheffield stands. This provision would meet London Plan standards from Policy T5. There is a submitted Cycle Promotion Plan (CPP), with measures to promote cycling and use of the on-site cycle parking, along with methods for monitoring use and responding to feedback from cyclist visitors. The data and insights from the CPP should be fed into the Cultural Strategy and associated long-term management if possible. There are 82 short-stay cycle parking spaces proposed in compliance with Policy T5 minimum requirements. However, provision to the south along the river is requested, and confirmation that the new quayside public space areas and onward links east and west along the river will be accessible to cyclists generally. Sheffield stands proposed on the TLRN footway to the north may be supported but should form part of the earlier requested section 278 (s278) works and scope agreed with TfL by determination. The 15 proposed on Old Billingsgate Walk, with the northern most able to accommodate larger, accessible cycles, are strongly supported.

	The delivery and design of all proposed cycle parking should be secured by pre-occupation condition. Healthy Streets and public realm Removal of the existing private car park on the River Thames north bank is proposed, to provide a new landscaped area of public realm, connecting the City Walkway along the River Thames. This remains supported in line with London Plan policies T2 (Healthy Streets) and D8 (Public Realm). It would also improve Pedestrian Comfort Levels (PCLs) by widening the existing walkway currently restricted by the existing car park. Pedestrian improvements through hard and soft landscaping are proposed on all sides of the site, which is also welcomed and strongly supported. They include regrading of the footway on Lower Thames Street to provide level access into the building from the north, a widened and improved footway on the west side of Water Lane and a new raised table proposed to provide level access across that road, a substantial new public realm area along the Quayside to the south, with full inclusive access from the Custom House building via shallow ramps and other step free design features, and new resurfacing, stairs and ramped access to also serve pedestrians along Old Billingsgate Walk to the west. Existing pedestrian access from the highway network to the north suffers from some considerable permeability and severance issues due to the lack of crossings and legacy highway infrastructure. Walking westwards to Blackfriars pier and interchange along the Thames is currently possible but not directly outside and in front of the site's southern frontage at the river's edge due to the car park. Eastwards, the 'City Walkway' path cuts in away from the river for onward walking east to London Bridge, the Tower of London, Tower Hill LU and Tower Gateway DLR stations. To address this the existing fencing and car park that currently separates the Thames path from the site would be removed, helping to create an expanded publicly accessible area more suitable for social

	activities, formal and informal play and social interaction during the daytime, evening and at night, in line with Policy D8. Full public access to the quayside public realm should be secured in perpetuity, 24 hours per day and 7 days per week, throughout the year. Closures of very short duration to maintain landownership would be acceptable. In line with London Plan Policy T2, safety measures are proposed in the form of street lighting and overlooking to ensure natural surveillance. The incorporation of green infrastructure in the form of soft landscaping within the quayside area and planters along the Thames Street footpath to green the public realm are also welcomed. The proposed landscaping also takes into consideration flood risk mitigation requirements and includes Sustainable urban Drainage (SuDs) in line with London Plan policies SI, 13 and D8 part I, which is supported. Trip Generation Analysis in the Transport Assessment (TA) indicates that the development proposal would be likely to result in fewer trips during the weekday AM and PM peak periods by private car and public transport modes, compared to the previous office building use. This is acceptable in principle in accordance with Policies T1 and T4. Active Travel Zone (ATZ) TfL welcomes that a night-time Active Travel Zone (ATZ) assessment, assessing five local walking routes, has now been provided for this development. The ATZ proposes potential improvements to the street network at the junction of Mark Lane/Hart Street; the City Corporation are recommended to secure these through s278, s106, or works in kind, at their preference. Proposals to re-surface and re-level the footway on Lower Thames Street and relocate street signage closer to the kerb line as part of the lay-by and

	access for all highway works are noted and agreed in principle, subject to full implementation via s278. Full Pedestrian Comfort Levels (PCLs) assessment may be requested to ensure the crossings immediately surrounding the site are wide enough with sufficient capacity for all visitors at peak times. Key opportunities for crossing improvements in the surrounding ATZ include north-south across the TLRN north-west of the site as earlier mentioned, and also at various points along King William Street where the City Corporation has recently announced a Pedestrian Priority Streets Programme project. The ATZ route including King William Street that many visitors will use to access the site should be checked against the emerging City project to identify any necessary additional highway works further south, closer to Custom House, which may be required to ensure high quality walking conditions along its entire length from Monument. Travel Plan The largest room within The Galleries is proposed as a free-to-use engagement space for schools, community groups, charities and cultural organisations, which is welcome. The proposed commitment to ensure this space is bookable free of charge for groups between 10:00 and 17:00 each day should be secured in the s106 and cultural strategy. TfL notes no end-of-trip facilities are currently proposed for cyclists to serve the hotel as a commercial use. Provision of end-of-trip facilities to enable hotel staff to cycle to work should be secured in the final Travel Plan. Deliveries and servicing TfL welcomes that a draft Delivery and Servicing and Waste Management plan has been provided. The final Delivery Servicing Plan (DSP) should be secured by condition or S106 as appropriate, and discharged in consultation with TfL due to the close proximity to the TLRN. It should follow TfL guidance, as required by Policies T4 and T7.

	It is welcomed that all servicing would be conducted on-site in a dedicated yard at basement level, meaning that no servicing activity will take place along Water Lane, Lower Thames Street or the Quayside in close proximity to the Blue Badge parking. The overall proposals align well with London Plan Policy T7. To maximise the extent of public realm on the quayside, the existing vehicle ramp to the south of the East Wing would be removed and replaced by a vehicle lift for deliveries and servicing. This is very welcome. All delivery and servicing arrangements would be scheduled to occur outside of peak hours; this is welcomed in line with London Plan Policy T7 and relevant local policy, which seeks to minimise congestion and reduce road hazards. Commitment to a maximum of 28 deliveries per day is proposed as per the prior scheme; this is acceptable subject to the effective management of deliveries entering/exiting the site, and the timed delivery restrictions, to ensure the safety of the public in line with Policy T7 Part G. Construction and demolition TfL welcomes the Outline Construction Logistics Plan (CLP) in line with London Plan Policy T7. The final and Detailed CLP should be produced in accordance with TfL's CLP guidance and secured by condition or S106 as appropriate, and discharged in consultation with TfL due to the close proximity to the TLRN. The proposed hoarding around Lower Thames Street to facilitate the construction process will require a separate license with TfL. It is welcomed that all construction vehicles would enter the site in forward gear from Lower Thames Street and exit in forward gear onto Water Lane before again exiting out via Lower Thames Street. It is welcomed that there would be banksmen on-site to help manage construction vehicle movements, as well as traffic marshals employed throughout the construction phase. This demonstrates careful

	consideration has been given to minimising the impact of vehicle movements on the local road network and maintaining pedestrian safety at all times. The Outline CLP also provides detailed information on the expected times of construction vehicle movements to and from the site. These should be managed to ensure that there is no queuing on the TLRN and disruption on the local highway network is minimised. Summary 1. Further detail must be provided prior to determination for TfL to validate the design of the proposed highway works along the TLRN. 2. Thereafter, an updated Road Safety Audit and Designers Response to be submitted and approved by TfL. RSA to follow TfL RSA procedure SQA-0170. 3. Clarification on how the proposed Blue Badge parking spaces will be accessible when the proposed basement servicing areas are in use. 4. Sheffield stands proposed on the TLRN footway to form part of the S278 and agreed by TfL. 5. Clarification on the proposed cycle accessibility of the new quayside public space areas and links east and west along the river. 6. The applicant is required to provide end-of-trip facilities for staff. 7. TfL request a meeting with the applicant to discuss the submitted night-time ATZ assessment and other requirements for the surrounding highway to also ensure high-quality day-time active travel access. 8. TfL may request a Pedestrian Comfort Level (PCL) assessment to be carried out of the existing western crossing on Lower Thames Street prior to determination, for TfL to assess the impacts of the proposal's additional footfall on the crossing. 9. Widening of the existing western pedestrian crossing on Lower Thames Street to form part of the S278 agreement with TfL, to be secured by condition or in the S106, as appropriate.

	10. A final DSP to be secured by a pre-commencement condition, discharged in consultation with TfL. 11. Full CLP secured by pre-commencement condition, discharged in consultation with TfL, and committing to Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety Standards (CLOCS). 12. The proposed hoarding around Lower Thames Street will require a separate license with TfL. Officer Response: These comments of address in the Highways and Transportation section of this report, and the relevant S106 obligations and conditions would be secured. Email dated 15th August 2025 TfL must be closely consulted throughout finalisation of the s106 due to the requirement for a s278 agreement on TLRN highway under our authority with the Pedestrian Comfort Levels assessment (PCLs) to confirm an appropriate design for north-south crossing upgrades. Additionally relevant parts of the s106 should make clear that "the above works may require strategic modelling to TfL standards with TfL or TfL-approved independent auditing at the Owner's expense. The s106 agreement needs to specify an agreed scope of s278 works, you have made clear, but the works will also need to be subsequently designed, validated and delivered by the applicant, including all technical assurance, road safety audits and traffic modelling if requested, with any necessary auditing in full accordance with the TfL Transport Modelling Guidance (https://tfl.gov.uk/corporate/publications-and-reports/transport-modelling-guidance) and Model Audit Process (MAP). Finally, in the applicant's recent response to you on Transport matters, Paragraph 7 states "The agreed deliveries cap does not include cargo bikes and motorcycles." and "The cap also excludes...facilities management vehicles and associated emergency repairs activity which may occur to the Site." These

	exclusions are unacceptable and should not be retained. Officer Response: These comments are noted and will be incorporated in the relevant S106 obligations and conditions.
TfL Infrastructure Protection	Confirmed no comments to make. Officer Response: Noted.
Air Quality	No objection subject to conditions. Officer Response: The requested conditions are included in the conditions schedule.
Thames Water	Waste Comments Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. There are public sewers crossing or close to the development. If you are planning significant works near our sewers, it's important that you minimise risk of damage. We'll need to check your development doesn't limit repair or maintenance activities or inhibit the services we provide in any way. The applicant is advised to read our guide working near or diverting pipes. As required by Building Regulations part H paragraph 2.36, Thames Water requests that the applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing positively pumped device (or equivalent reflecting technological advances), on the assumption that the sewage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Plan from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.

	Water Comments On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission: Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. There are water mains crossing or close to the development. Thames Water do not permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The proposed development is located within 15m of our underground water assets and as such the following informative is required: The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Officer Response: Noted, and recommended informatives would be attached.
Historic England	Thank you for your letters of 8 April 2025 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications. Summary The grade I listed Custom House is one of London's greatest Georgian buildings with contributions by leading architects of the time. It also played an

	important role in the history of the City of London and the wealth of the nation. The building now stands vacant since HM Revenue and Customs departed in 2020. Historic England welcomes the proposed reuse of the Custom House as an hotel with other ancillary uses that would be publicly accessible. We consider that the application proposals are sympathetic to the significance of the building and will secure its long term future. Historic England Advice Significance The Custom House provided the facilities for registration and collection of taxes from all ships entering and leaving the Port of London. This function was the antecedent of HM Revenue and Customs today, which occupied the building until 2020. Through collecting considerable revenue, the Custom House played a critical role in the economic fortunes of the Crown and state since medieval times. It was at the centre of a web of worldwide trade connections and the present building is an important survivor of the nation's history of shipping and industry, which once dominated the City of London. There have been a series of Custom Houses standing on the north banks of the Thames in the City of London since the 14th century. These included one by Sir Christopher Wren, which was burnt down in 1718, and then rebuilt in 1724 to the designs of Thomas Ripley. In 1812-17 the present building was built on a new site to the west to designs by David Laing, Surveyor to the Customs. Following disastrous structural issues and the partial collapse of the central section in 1822, Robert Smirke rebuilt this portion between 1825-8 on concrete foundations, with the use of cast iron. The Custom House is 488 feet long and has an impressive river frontage. At the same time as Laing's construction, John Rennie rebuilt the quay side, quay wall and river stairs in front of the Custom House. This provided the principal access from the Thames and was a hugely important and bustling part of the river's edge with ships docking and unloading.

	The East and West Wings of Custom House were originally organised by departments, their locations based on their need to be close to the river or the Long Room, where the taxes were collected. Each wing was arranged around a central light well. Laing kept decoration to a minimum judging ‘that ornament was not suited to the character of an edifice intended to accommodate the commercial concerns of the nation, though combined with most important public interests.’ Smirke’s Central Wing has a central entrance from Lower Thames Street into a grand entrance with an impressive principal staircase leading to the Long Room. At 190 feet long, 66 feet wide, 55 feet high, the Long Room was one of the largest in Europe. The customs' clerks and officers were housed in wooden booths along both long sides of the room, an arrangement which is reflected in the surviving cabinetry around the perimeter of the room, which is likely to be original to Smirke. In the centre of the room, tables were provided for merchants or their servants to wait and cast up accounts. To the ground floor, Smirke’s King’s Warehouse is a large, vaulted space with iron columns which was originally used to store confiscated goods. This space has been subdivided in the late 19th century and 20th century with high quality timber partitioning that reflects the changing uses of the warehouse space. Beneath this is a fireproof brick vaulted basement area that was used for further storage. The building survived relatively unaltered from Smirke's work until the east wing was badly damaged during the Blitz. In 1962-66 the east wing was rebuilt, to the designs of F.L. Rothwell and H.G. Hexley of the Ministry of Public Building and Works. Externally the East Wing is a replica while the interior has a much-changed configuration. The Custom House is one of London’s greatest Georgian buildings and with its quay side has an important presence on the north bank of the Thames. The building remains of exceptional architectural and historic interest despite the loss and reconstruction of the East Wing and alterations to the Laing and Smirke interiors, which nonetheless retain many of their historic fixtures and fittings. This is reflected in

	its grade I listing. Likewise, the quayside, quay wall, steps and cranes remain and are separately listed at grade II* . The building has been vacant since 2020. The quayside lies partly within its curtilage and is currently separated from the surrounding public realm and riverside walkway via modern walls and railings. This area retains some features of interest related to the Custom House, including lamp standards and cranes. The impact of proposals on the significance of Custom House and its quayside The proposals are to convert the Custom House into an hotel with other publicly accessible uses including a spa, food and beverage offers and gallery/cultural space. The key elements of the proposals are as follows: Basement area Existing services and plant would be removed from this area and many of Smirke's original brick vaulted spaces would be repurposed as spa accommodation. New plant would be principally located within the East Wing, where much of the fabric has been renewed following WWII bomb damage, and service networks would be delivered via pipes within new trenches below the floor levels. This is likely to affect existing stone floor finishes, which are proposed to be reinstated following the works. We consider the impact of these works on the heritage significance of the building to be low, subject to further detailed design. Central Wing The proposals include the reopening of the main entrance onto Lower Thames Street and the repair and redecoration of the front circulation spaces to a scheme more akin to Smirke's original designs. New WCs, lift and stair core would be provided in the front rooms on the north side of the building. We acknowledge the need to provide these functions to ensure that the building is fully accessible and provides modern facilities that support its proposed use. However, the creation of vertical connections

	for the proposed lifts and stairs would result in the removal of part of Smirke's original floor structures and vaulted ceiling. We therefore consider these proposals to cause some harm to the heritage significance of the building through the removal of fabric of historic and architectural interest. King's Warehouse The King's Warehouse is proposed to be used for food and beverage purposes. The existing modern services, which are highly prominent, would be removed and replaced with more discrete servicing. We understand that the existing timber partitions would be partially retained and reused to provide new subdivisions. In our view, the impact of the proposals on the heritage significance of this space are likely to be low but will in part depend on the final design and location of the new insertions into the space. The Long Room The Long Room is proposed to be used for food and beverage purposes. The internal finishes would be repaired and redecorated to a colour scheme more akin to Smirke's original intentions, which may enhance the architectural significance of the space. The most significant works relate to the creation of new door openings and the lowering of the five windows addressing the southern portico. This would involve the removal of some early cabinetry and the adaptation of the sash windows to provide new lower sections incorporating panelling and door openings. This work is intended to provide greater access to enable the proposed uses, increase visibility through to the Thames (which is currently not visible from the Long Room) and provide access to a proposed new terrace within the southern portico. Whilst these proposals involve the loss of some cabinetry and the original fenestration pattern to the portico, we consider that they are well thought through and create a relatively low impact on the significance of the Long Room and the southern elevation of the building. West Wing The ground floor of the West Wing would be used for food and beverage purposes and a gallery/education

	space. A number of large office rooms would be converted to hotel bedrooms at this level and on the upper floors. The proposals seek to work with the existing floor plan, which remains largely unaltered. Existing features of architectural interest, such as chimney pieces, panelling, doors, overlights and cabinetry would be retained and reused, wherever possible. The proportions of Smirke's original lightwell would be reinstated through removal of the existing modern stair and lift core and placing new lifts and a staircase in adjacent spaces of lower significance. The most significant impacts are likely to relate to the installation of modern servicing and new riser ducts, which have been designed to appear as subsidiary features within the hotel bedroom spaces. Overall, the impact of the proposals are considered to be relatively low, subject to the detailed design. . East Wing The modern interior of this wing would be comprehensively reconfigured behind the retained elevations to provide smaller hotel and bathroom units, back of house and plant space. The intensified use of this wing would avoid the need for greater alteration to the more significant parts of the building and overall, we consider these proposals have a minimal impact on fabric of heritage significance. The most notable change would be re-profiling of the roof in order to create a plant enclosure. Whilst the new roof profile would result in marginally greater visibility, we consider the impact on the overall architectural interest and composition of the building to be low. Works to external elevations and quayside The proposals include the cleaning and repair of the external facades and creation of new door openings at ground floor level to provide additional means of access to the building. The existing windows would be largely upgraded to improve thermal and acoustic performance and would be redecorated to a new darker colour inspired by historic documentation and/or paint research. External solar blinds are proposed to be installed to the bedroom windows on

	the south and west elevations. The blinds would be colour matched to the window frames and would be automated to respond to changing sunlight conditions. Whilst there would be some loss of historic fabric to provide the additional door openings, we consider the impact on the significance of the building is low and may result in enhancements to the presentation of the external elevations and the ability of the interiors to cope with solar heat ingress. The most significant change to the external area around the Custom House would be re-landscaping of the quayside and provision of public access through the removal of the modern railings to the riverside walk. The proposed works include the removal of the large service ramp down to basement level and its replacement with a vehicular lift to a much smaller footprint. The central principal entrance on the Thames side would be accessed by a new symmetrically-designed staircase and ramp arrangement. The entrance would be flanked by two large, raised terraces that would be publicly accessible and would contain seating associated with the food and beverage offers within the hotel. The remaining area of the quayside would be landscaped and paved in natural stone with new planters and seating. Existing features, including the lamp standards and cranes, would be repaired and re-integrated into the design of the landscape Whilst the proposals would involve some removal (or encapsulation) of historic fabric, namely the existing entrance steps, we consider this impact on the heritage significance of the building to be low and potentially reversible. In our view, the proposed arrangement is likely to have a positive impact on the overall presentation and accessibility of the Custom House and will enhance its relationship to the Thames and riverside walk. Position Historic England was involved in extensive pre-application discussions with your authority and the applicant's team, which has culminated in the submission of the current applications for planning permission and listed building consent. We are

	pleased to see that much of the advice that we provided during those discussions has been taken into account in this final submission. Historic England welcomes the proposed reuse of the Custom House in a manner that appears sympathetic to its significance and which will secure its long term future. We consider the proposed repair, refurbishment and repurposing of the building, as set out in the application proposals, to be significant heritage benefits. Where we have identified harm arising from the proposals, we consider this harm to have a fairly low impact on the significance of the Custom House and acknowledge that the applicant has provided justification for each area of work. We therefore recommend that your authority weighs this harm against any public benefits arising from the proposals, in accordance with policies set out in the local planning framework and the NPPF. We note that some of the impacts on the heritage significance of the building will be dependent upon securing high quality detailing and execution on site. We therefore encourage you to consider placing conditions on any grant of listed building consent relating to the following: Details of servicing, including plant areas, service distribution routes and associated finishes. Internal decorative finishes to rooms in West Wing and Central Wing at ground and first floor levels, including any necessary works to address fire spread. Details of proposed new lift and stair core in the Central Wing, including any structural interventions. Details of reuse of cabinetry and other features of interest, such as the partitioning in the King's Warehouse, that may be displaced or altered by the works. Works to windows, including any new joinery, glazing, colour finishes, secondary glazing and external blinds.

	Details of new external doors, including works to existing elevations to create new openings. Materials and final finishes to external areas, including new southern step/ramp and terrace arrangement, as well as quayside finishes. Details of proposed safety access system at roof level. Recommendation Historic England supports the applications on heritage grounds. Officer Response: These comments are noted and suggested conditions are included.
Natural England	No objection. Officer Response: Noted.
Port of London Authority	The application states that the proposed development has been developed in line with draft City Plan Strategic Policy S17 (Thames Policy Area and the associated Riverside Walk Enhancement Strategy (2015) as the existing Thames-side car park that is currently fenced off and inaccessible to the public will be transformed into a new public square and riverside promenade that will be accessible to the public 24 hours day, all year round, with the existing fencing along the Thames Path removed . These proposals are welcomed by the PLA and are in line with the PLA Thames Vision 2050 Plan which includes the aim to see more people enjoying the River Thames and its banks. As part of the enhancements to the public realm here it must be ensured in line with the City of London's Thames Strategy Supplementary Planning Document (SPD) (2015) that appropriate Riparian Life Saving equipment (such as grab chains and lifebuoys) are retained and/or provided and the PLA's 'A Safer Riverside' guidance for developments alongside and on the Tidal Thames. (A Safer Riverside). The PLA requests that an appropriately worded condition must be added to any forthcoming planning consent requesting that such infrastructure is provided, in consultation with the PLA. In addition, it is noted that the existing river steps to the foreshore located in the southeast corner of the proposed development appear unchanged. Access to/from the foreshore via

	these steps must be retained as part of the development proposals. On lighting, the external lighting assessment provides details of the external lighting for the scheme, which uses existing lamp columns and uplighters around the exiting trees. Section 9.11 (Public Realm Lighting) of the Design and Access Statement and the associated external lighting statement show appropriate lighting levels adjacent to the riverside. Within the application documents there are a number of references to potential events (such as Christmas markets and art displays etc) that could take place here in the future. The PLA should be consulted on such proposals as necessary, particularly on any temporary lighting, to ensure this is appropriate. It appears from the proposed development a new outfall is proposed into the River Thames. To note all temporary and permanent works in, on or over the River Thames will require a River Works Licence with the PLA, and the PLA Statutory Consents and Compliance team should be contacted at lic.app@pla.co.uk This should be added as an informative as part of any forthcoming planning permission. On transport, the PLA welcome that reference, including timetables is given in the Transport Assessment and Travel Plan to the nearby riverbus services available from Tower Pier, located a couple of minutes away from the proposed development. The Travel Plan highlights that staff of the proposed development will be provided with Travel Information Packs which will include details of nearby Public Transport Services. As part of this it must be ensured that riverbus service information is included in these packs. The application documents also state that a Delivery and Servicing Plan will be provided as part of the application. Given the closeness of the nearby Tower Pier, in line with emerging Local Plan policy VT4 (River Transport) consideration should be given to the potential role the pier could play as part of the delivery / servicing arrangements of the operational development. Officer Response: The relevant conditions and informatives are attached.

Letters of Representation

38. Across both the planning and listed building consent applications, 16 letters of support were received (1x on both applications and 15x on the planning permission only). Two letters of objections have been received from members of the public/ Groups (1x on both applications and 1x on the LBC only), and these are set out below.

Representation 1: River Residents Group

The River Residents Group (RRG) is made up of people who live, work and travel on or by the Thames and/or are concerned with its conservancy. The RRG is unincorporated, self-funding and run by a volunteer steering group guided by our constitution. We publish regular newsletters. Working with communities in six riparian boroughs, we respond to Planning and Licensing applications on the Thames, working with riparian Environmental Health, Licensing and Planning officers and the London Port Health Authority (LPHA), arranging public and virtual meetings. We liaise with councillors and MPs to raise the concerns of our communities. We have developed a Google Tool to document and analyse excessive noise from vessels, recording 2600 incidents in the last three years.

Our Objection:

There are many good things to say about the sympathetic interior design, reuse of historic materials, generous interior public spaces and amenities offered by this scheme. However, we feel the need to make an objection because we are concerned about a lack of specific conditions to protect the use of the Public Realm by the river.

The applicants' Planning Consultant, who has been helpful in providing materials, has advised us that "The City of London will be responsible for determining the appropriate planning conditions and legal obligations which need to be attached to any future planning permission to control the use of the public realm."

We would have been happier to see the applicant offering some such conditions publicly for discussion (and indeed endorsement). However, as that is not the applicants' intention, we would like to suggest some conditions to protect the Public Realm at this important site.

We are extremely worried about the current application to transform a large part of the Public Realm at adjacent Sugar Quay into a private bar – years after the developers had reserved that space for use of the public and residents in a quiet, non-intrusive way. For this reason, we believe that a strenuous and binding condition needs to be baked into the Consent for this scheme at Customs House. This is not just to ensure that the Public Realm is protected from self-generated overdevelopment but also to make sure it is

protected from consequent and ‘parasitic’ uses arising from the space being perceived as a drinking area. We have seen the consequences of a bar at the Oystershed near Swan Lane, where enormous numbers of bottles and plastic cups are left by the river and frequently blow into the water, not mention the crowds of many hundreds who assemble there with supermarket alcohol since the establishment of this large bar by the river.

The following conditions are offered, in order to futureproof this application:
1. The Public Realm by the river shall not be privatised in whole or in part for private for the creation of a bar or restaurant. No applications shall be put forward that would propose such a change.
2. No vertical consumption of alcohol shall be allowed in the Public Realm. The management of the development will be responsible for ensuring that the space is not used in that way by people who are not patrons of its own Licensed Premises.
3. Temporary Event Notice applications for private events at in the riverside area shall be restricted to three a year and the hours shall not exceed 10pm, given the proximity of London Bridge Hospital and Sugar Quay.
4. An Operational Management Plan for any such events will be provided as part of the Planning Consent, showing dispersal plans and hours of servicing, which are not to be between 10pm and 8am.
5. Any furniture outside shall be brought inside at 10pm or made unusable by that time.
6. Any Premises Licences sought by concessions at the site shall be restricted to 10am to 10pm including half-an-hour drinking up time, and shall not include off-sales.
7. No amplified music shall be played in the Public Realm, except when there is a special event or performance.
8. In the case of a special event or performance, amplified sounds shall not exceed 75 decibels.
9. Given the proximity of 165 apartments at Sugar Quay and London Bridge Hospital across the river (which transmits noise efficiently) any noisy jet cleaning of the area or other servicing will take place outside the hours of 10pm and 8am.
10. The existing riverside railings will not be removed or replaced by any kind of parapet where the public might sit or leave bottles and glasses.
11. The existing riverside railings will not be removed or altered to create access to party boats or any other kind of privatised and impactful use of the riverfront such as a jetty for private parties.
12. The existing riverside railings will not be removed or altered to create access to party boats or any other kind of structure that would compromise amenity or public access to the river view in any way.
13. Signage on the riverside exterior will indicate that the public is welcome to come inside and also signal the availability of toilets.

Without such conditions baked into the Consent, we are concerned about the potential colonisation, commercialisation and narrowing of a very large area that is currently offered as public space on one of the busiest stretches1 of the Thameside walkway – which would fail to comply with national or local Planning policy.

Policy Basis for these conditions:

Our proposed conditions would help to put the development in line with the London Plan (2021) Policy D13 Agent of Change. The Agent of Change principle places the responsibility for mitigating impacts on the entity that is proposing a change.

C New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
D Development proposals should manage noise and other potential nuisances by:
1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.
E Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.

The City Plan 2040 endorses this policy:

"4.5.2 The 'Agent of Change' principle makes developers responsible for addressing at the design stage the environmental and other impacts of development on existing neighbouring occupiers. Applicants for development near to existing residential properties should identify potential impacts on residential amenity and set out measures to mitigate those impacts within their Design and Access Statements or other supporting application documents."

City Plan 2040 3.13.0 notes:

"The City increasingly operates on a seven day a week basis, with an increase in evening and night-time uses. This will result in an increase in pedestrian movements within the City as patrons enter and exit public houses, bars, night-clubs and restaurants. Anti-social behaviour, including noise, disturbance and odours arising from the operation of the premises can be disruptive to City residents and occupiers and proposals should seek to mitigate any negative impacts that may arise, incorporating the Agent of Change principle."

This section of Plan notes that servicing can cause significant noise, as can departing patrons.

The importance of preserving and protecting open air spaces for City residents is stressed in the City Plan 2040, with a special mention given to the riverside:

"3.1.6 3.1.7 Outdoor spaces and the public realm provide places for relaxation, amenity and leisure. The location and nature of the City means that perceptions of tranquillity and quieter areas are often based on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels. The City Corporation's Noise Strategy 2016-2026 supports the creation of tranquil areas in the City and promotes awareness of the importance of protecting and enhancing these locations where possible. Examples of quieter areas in the City are open spaces, parts of the Riverside Walk, churchyards and housing estates. Research on traffic noise has found that long-term exposure to noise above a certain level can have negative impacts on physical and mental health. It is therefore important to protect the relative tranquillity of some of the City's open spaces to confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels, and assisting in the restoration and recovery from sensory overload."

The RRG is uneasy about any privatisation and colonisation of precious riverside outdoor space. We need more public places, not fewer. The riverside walk at this site is already congested with walkers, especially during the summer.

The London Plan resists any attempt to diminish access to healthy streets and walkable areas.

The City Plan 2040 states:

12.1.0 12.1.1 The City is densely built up and most of its open space provision consists of small spaces at street level. Open spaces are vital to the City, offering residents, workers and visitors outside spaces in which to spend time, relax, and encounter nature, and play a crucial role in providing opportunities for play, exercise and recreation, and social interaction. Open spaces are also inclusive, providing free access for everyone. They are important havens for wildlife and enrich the City's biodiversity, and help to mitigate the effects of climate change, improve air quality and benefit wellbeing, and physical and mental health.

It also recommends (Strategic Policy S17: Thames Policy Area)

d. refusing development on or over the River Thames, except for structures that specifically require a waterside location for river related uses;

The same policy asserts that any riverside terraces only in places where "they do not impact adversely on protected views, the amenity of occupiers or nearby residents"

It also provides for: a. protecting and enhancing permanent public access and river views along the Riverside Walk; b. improving access to the River Thames by enhancing north-south routes and the widening of the Riverside Walk; c. maximising opportunities for public open space along the riverfront and seeking public realm improvements and increased permeability to the north of the Riverside Walk; The RIVERSIDE WALK ENHANCEMENT STRATEGY noted that this area had heavy traffic: "London Bridge was the main point of entry with the heaviest flow of people heading east towards Custom House/Sugar Quay."3 Section 5.6 on Current and Future Movement notes that the walk is used by local works, residents, children, joggers, tourists, families, those heading to places of food and entertainment. It notices that "significant" numbers of joggers are using the path. It lists one of the constraints of the Riverside Walk as "Not enough green spaces or places to rest / play". Conclusion This scheme requires some tangible conditions to ensure that it conforms with national and local policy on amenity and permeable public spaces, particularly on the Thames riverfront. Officer Response: These matters are addressed in the report below, in sections concerning noise and vibration, light pollution, cultural offer and strategy, and principle of development. Where the use of planning conditions is appropriate and reasonable these are recommended, as detailed below, and in particular an s106 obligation is recommended concerning the submission of a Quayside Management Plan alongside conditions related to noise impacts, restrictions on amplified music, and hours of use as recommended in part by the Environmental Health department.
Representation 2: I strongly object to the application on the grounds that the proposed use of these premises is out of keeping with the historical use of these premises' buildings and the area in general. Officer Response: The acceptability of the principle of the proposed use is addressed in the principle of development section of this report.

Policy Context

39. The Development Plan consists of the London Plan 2021, and the City of London Local Plan 2015. The London Plan and Local Plan policies that are

most relevant to the consideration of this case are set out in Appendix B to this report.

40. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation on 18 April 2024. It was then submitted to the Secretary of State on 29 August 2024 and has completed the formal hearings of its Examination in Public at the time of writing this report. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 49 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

41. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2025 and the Planning Practice Guidance (PPG), which is amended from time to time.

The NPPF

42. The NPPF states at paragraph 2 that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

43. Chapter 2 of the NPPF focuses on achieving sustainable development. Paragraph 8 states that achieving sustainable development has three overarching objectives, being economic, social and environmental. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development". Paragraph 11 sets out this presumption.

44. Chapter 4 of the NPPF focuses upon determining applications. Paragraph 49 states that local planning authorities may give weight to relevant policies in emerging plans according to: a) the stage of preparation of the emerging plan (the more advanced its preparation the greater weight that may be given); b) the extent to which there are unresolved objection to relevant policies (the less significant the unresolved objections, the greater the weight that may be given), and c) the degree of constancy of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to this polices in this Framework, the greater the weight can be given).

45. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be places on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address challenges for the future. This is particularly important where Britain

can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance potential.

46. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles. Paragraph 98 states that planning decisions should provide the social, recreational and cultural facilities and services the community needs.

47. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 110 states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help reduce congestion and emissions and improve air quality and public health.

48. Paragraph 117 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs to the people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure, attractive and which minimise the scope for conflicts between pedestrian, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles; and be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

49. Paragraph 118 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

50. Chapter 11 of the NPPF seeks to make effective use of the land. Paragraph 124 advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

51. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, create better places in which to live and work and helps make development acceptable to communities.

52. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually

attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

53. Paragraph 136 of the NPPF states that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible.

54. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

55. Chapter 14 of the NPPF relates to meeting the challenge of climate change flooding and coastal change. Paragraph 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings, and support renewable and low carbon energy and associated infrastructure.

56. Paragraph 164 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, and help to reduce greenhouse gas emissions, such as through its location, orientation and design.

57. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 187 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment

by, amongst other things, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.

58. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 208 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

59. Paragraph 210 of the NPPF advises, in determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

60. Paragraph 212 of the NPPF advises that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

61. Paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

62. Paragraph 215 of the NPPF states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Statutory Duties and Considerations

63. The Corporation, in determining the application has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far as material to application(s), local finance considerations so far as material to the application, and to any other material considerations (Section 70(2) Town and Country Planning Act 1990);
- To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

64. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

65. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possessed. (Section 66 (1) Planning (Listed Building and Conservation Areas) Act 1990).

66. In determining the application(s), consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.

67. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the plan as a whole the proposal does or does not accord with it.

68. The principal issues in considering this application are:

a) The principle of development, including the loss of existing office space, the proposed hotel and associated uses and the site's cultural offer.
b) The economic impact of the proposal.
c) The impact of the development on the character and appearance of the building and area and the design of the building itself.
d) The impact of the development on designated and non-designated heritage assets.
e) The impact of strategic view in the London Views Management Framework and on other strategic local views.
f) The impact of the development on public realm
g) The impact of the development on ecology

h) The accessibility and inclusivity of the development
i) The impact of the development on any potential archaeological assets beneath the site.
j) The impact of the development in highway and transportation terms.
k) The impact of the development in terms of energy, sustainability and climate change.
l) The acceptability of the scheme in terms of its environmental impacts, including daylight and sunlight, thermal comfort, noise and vibration, air quality, flood risk and contamination.
m) The impact of the proposed development on the amenity of nearby residential and other occupiers.
n) Acceptability of the proposed security, suicide prevention and fire safety arrangements.
o) The impact of the development on flood risk,
p) The outcome of the Health Impact Assessment.
q) An assessment of the public benefits of the proposal and whether they would be sufficient to outweigh any heritage harm.
r) The requirement of the development to secure financial contributions and planning obligations
s) Duties under the Public Sector Duty (section 149 of the Equality Act 2010) and The Human Rights Act 1998.

Principle of Development

Loss of Office Floor Space

69. The NPPF places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.

70. London Plan policies E1 and SD4 support the increase in office floorspace and the internationally significant office functions of the Central Activities Zone (CAZ). Likewise, Core Strategic Policy CS1 of the Local Plan 2015 and Strategic Policy S4 of the emerging City Plan 2040 seek to ensure that the City provides additional office accommodation to meet demand from long term economic and employment growth and seeks to protect the existing office stock.

71. The proposed development would result in the loss of 19,794sqm GIA of Class E(g) office floorspace through the proposed change of use.

72. Local Plan Policy DM1.1 of the Local Plan 2015 and Policy OF2 of the emerging City Plan 2040 seek to protect office accommodation. Policy DM1.1 seeks to prevent the loss of existing office accommodation where the building is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. *"Losses would be inappropriate for any of the following reasons:*

- *Prejudicing the primary business function of the City;*
- *Jeopardising the future assembly and delivery of large office development sites;*
- *Removing existing stock for which there is a demand in the office market for or long term viable need;*
- *Introducing uses that adversely affect the existing beneficial mix of commercial uses."*

73. The supporting text (paragraph 3.1.8) to the Local Plan Policy DM10.1 and the Office Use SPD indicate that proposals for the change from offices will normally be refused if the building or site is considered suitable for long-term viable office use. The Local Plan indicates that, exceptionally, the loss of an individual office development to other commercial uses may be acceptable where the proposed alternative use meets the wider objectives of the Local Plan.

74. Policy OF2 of the emerging City Plan 2040 states that the loss of existing office floorspace will be resisted unless it can be demonstrated that:

a. the proposed development would not lead to the loss of office floorspace that is, or sites that are, of a strategically important scale, type and/or location for the City;

b. The proposed development would not compromise the potential for office development on sites within the vicinity;

c. There is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months.

75. Part 2 of Policy OF2 of the emerging City Plan 2040 goes on to state that where the criteria set out above have been met proposals may follow one of the following routes:
    - *Viability Tested Route*
    - *Retrofit Fast Track*
    - *Residential Areas Route*
    - *Ground Floor Uses*

76. For the Retrofit Fast Track to be applicable, part 2 of policy OF2 states that proposed developments will be required to retain the substantial majority of the superstructure of the existing building, lead to an improvement on the environmental performance of the building, and result in the change of use to (one or mix of) hotel use, cultural use and/or educational use.

77. As set out above, policy and the Office Use SPD require evidence of marketing, the applicant has not undertaken formal marketing for alternative office use but

has submitted a Market Commentary (prepared by Savills). The report sets out that whilst the building has a Class E (g) use, Custom House is far from a typical office building as it was designed in 1828 with a design for its niche historic use, including prison cells, training facilities for riot police, telecommunication suites and the long rooms, with typical office accommodation only occupying part of the building. Further to this, the current layout is highly cellularised with limited structural flexibility and that the Grade I listed status of the building limits the alterations that can be made to the building. The report categorises Custom House a Grade B office space and goes onto state that demand and uptake in the City is for Grade A office space.

78. The report also includes an assessment of the letting potential of the three scenarios included in the financial viability assessment (discussed below); and it is concluded that Scenarios 1 and 2 would not generate demand from office tenants as a whole building or in part, it is highly unlikely that a tenant would be willing to take on Custom House as a whole or in part; the reasons for this include those set out above. In respect of Scenario 3, the report considers that the rigid structural layout, unconventional office space and location pose major concerns about whether it would attract any office occupiers with significant void periods highly likely. As the report considers that it is unlikely that a traditional office tenant, it has also considered if the building would be attractive to a serviced office occupier and due to the level of work required to suit modern occupier requirements is in excess of their capabilities and unlikely that they would be willing to take on such a large operation themselves.

79. The principle of a Market Commentary being provided instead of marketing as a matter of planning judgment is acceptable in this instance. It is noted for reference, that on the 2020 application which was presented to Committee in 2021, accepted an Office Market Review and Assessment of Letting Potential in place of formal marketing of the building.

80. To address policy requirements, the applicant has submitted a financial viability assessment (FVA) (prepared by Montagu Evans LLP, dated February 2025). The FVA has assessed three scenarios, which are set out below:

- Scenario 1: Minimum Refurbishment – this scenario would not include any additional massing or reconfiguration; it would reflect the minimum works required to put the existing building in a marketable condition and would provide floorspace considered sub-Grade B.
- Scenario 2: Comprehensive Office Refurbishment – this scenario would include minimal structural changes and would provide Grade B floorspace.
- Scenario 3: Full Grade A Refurbishment including the rebuilding of the East Wing.

81. It is noted that due to the application building being a Grade I listed building, Officers did not request for new build redevelopment scenario to be considered as the demolition of the Grade I listed building would not be supported.

82. The applicants FVA concludes that neither a minimum refurbishment, a comprehensive refurbishment or a full Grade A refurbishment including the rebuilding of the East Wing are viable future options when compared to the appropriate Benchmark Land Value (BLV). The applicant's FVA sets out this is due to the costs inherent in refurbishing this highly specialised listed building in in this secondary office location are not offset by the improvements in the scheme revenues that would result. The applicant's FVA has been third party reviewed by Avison Young (Financial Viability Review, dated June 2025), who were appointed by Officers. Avison Young have adopted their own assumptions where they are not in agreement with the applicant's assumptions, it is highlighted that there are a number of assumptions where Avison Young do not agree with the applicant's assumptions. Notwithstanding the disagreements on assumptions, Avison Young have also concluded that the continuation of office use at the subject site has been demonstrated to be unviable in the longer term.

83. Considering the conclusions of Avison Young third party review of the applicant's FVA, Officers consider that the proposed loss of offices is therefore considered acceptable, as it has been demonstrated that office use is not viable in the longer term. Whilst officers note that the site provides over 19,000sqm of office floor space, due to unique constraints of this building (discussed above), the proposed development would not lead to the loss of office floorspace that is of a strategically important scale, type, or location for the City.

84. The proposed development is considered to comply with the retrofit fast track route in part 2(b) of policy OF2, as the proposals retain the majority of the superstructure of the building and leads to an improved environmental performance of the building (both discussed in the Sustainability section of the report). The proposed development proposes a change of use to a hotel which is one of the uses set out in part 2(b) of policy OF2.

85. The loss of office accommodation is therefore considered to be acceptable and to comply with policies CS1 and DM1.1 of Local Plan 2015 and policies S4 and OF2 of the emerging City Plan.

Proposed Land Uses

86. This section of the report provides an overview in respect of the layout and proposed mix of uses for the hotel led mixed use development, before appraising the acceptability of the uses:

- 17,745sqm (GIA) of hotel floorspace (Use Class C1) – this would consist of 179 hotel rooms.

- 1,599sqm (GIA) of basement spa and health centre (Use Class E(d))
- 1,993sqm (GIA) of ground floor food and beverage, public north/south route, gallery and events space (Use Clas Sui Generis).

Provision of Hotel Accommodation

87. The application site is situated within the Central Activities Zone (CAZ). London Plan Policy SD4 states that the strategic function of the CAZ includes tourism and hotels.

88. London Plan Policy E10 is in relation to Visitor Infrastructure, and it states that London's visitor economy should be enhanced through visitor experience and supporting infrastructure, and that a sufficient supply and range of serviced accommodation should be maintained. The policy states that smaller scale provision should be promoted in the CAZ except wholly residential streets or predominately residential neighbourhoods and subject to the impact on office space and other strategic functions. It states that the intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses. The policy also requires accessible room provision. The supporting text of Policy E10 states in paragraph 6.10.2, it is estimated that 58,000 additional bedrooms of serviced accommodation will be required in London by 2041.

89. Based on the City of London Visitor Accommodation Sector Commercial Needs Study, dated January 2023, it is advised that there is a positive level of demand for additional hotel and serviced apartments development within the City of London. The application site is situated within the Pool of London and the Study sets out that use of the riverside will increase significantly with new riverside infrastructure.

90. Furthermore, the Study advises that "*despite the significant recent growth, the current pipeline of hotel projects within the City is relatively low (and lower than then neighbouring boroughs) with 10 schemes identified (including one serviced apartment) representing a potential increase of 1,483 bedrooms. This is likely due to a combination of available sites and the ongoing impact of both Covid-19 and the current economic downturn on funding markets".* It is also stated that *"future visitor accommodation demand prospects for the City remain buoyant".* Consideration has been given to the fact that the City has seen a growing shift towards becoming a leisure destination in its own right in recent years. It is therefore forecasted that *"there is demand for an additional 350 rooms per annum in the City of London to 2037, maintaining market occupants at around 85%. This represents supply growth of 4,012 rooms over 15 years, equating to a 38.6% increase, including those schemes in the planning pipeline".*

91. Policy CS11 of the Local Plan 2015 states that hotel development will be allowed where it supports the primary business function or cultural role of the City and hotels should be refused where these would compromise the business function or the potential for future business growth and that hotels should not be located where these would create amenity problems for existing residential areas. Policy DM11.3 states that new hotel and apart-hotel accommodation will be permitted where they:

- Do not prejudice the primary business needs of the City
- Are not contrary to policy DM1.1
- Contribute to the balance and mix of uses in the immediate locality
- Do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts
- Provide satisfactory arrangement for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of hotel or apart-hotel
- Are inclusive, providing at least 10% of hotel rooms to wheelchair accessible standards
- Ensure continuing beneficial use for historic buildings, where appropriate

92. Policy S6 of the emerging City Plan 2040 states that hotel developments will be allowed where they support the primary business or cultural role of the City. Policy CV4 of the emerging City Plan 2040 that proposals for hotels and other visitor accommodation will be permitted where they:

- Comply with the requirements of Policy OF2
- Do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts
- Provide active frontages and active uses at ground floor level, including facilities accessible to the public
- Are in suitable locations that provide access to attractions, workplaces and other destinations in and outside the City, including via public transport
- Provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles, waste storage, and taxis, appropriate to the size and nature of the development
- Are inclusive meeting London Plan accessibility standards for new hotel bedrooms
- Ensure continuing beneficial use for historic buildings, including enhanced and inclusive public access to and interpretation of heritage where appropriate
- Address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials).

93. The supporting text of Policy CV4 at paragraph 7.5.4 states that hotel development may be suited to listed buildings, providing an alternative use

which could enable significant heritage features to be conserved and enhanced. Where such a change of use is proposed, the City Corporation will seek improved inclusive public access to and interpretation of the building's heritage.

94. The supporting text of Policy CV4 at paragraph 7.5.5 states that hotels can cause amenity issues for surrounding occupiers, for example through noise and nuisance or traffic and servicing impacts. New hotel proposals will be expected to prioritise access by walking, cycling or public transport. The location of entrances exits, drop-off points and servicing and delivery arrangements will be considered in the context of surrounding occupiers.

95. As the application site is within the Thames Policy Area, part 2 (iii) of CS9 of the Local Plan 2015 and part 1 (d) of S17 of the emerging City Plan seek to improve the vibrancy along the river by encouraging a mix of uses.

96. The application site is also situated within the Pool of London Key Area of Change and as such policy S19 is of relevance. Part 2 states: Enabling office-led mixed commercial use or redevelopment or refurbishment, including the provision of retail, cultural and leisure uses that are complementary to, and do not detract from, the primary business function of the City and that enhance heritage assets.

97. The provision of a hotel use in this CAZ location is considered acceptable in principle in relation to the overarching London Plan policies.

98. It is considered that policy DM11.3 of the Local Plan and policy CV4 of the emerging City Plan 2040 set out the primary criteria for consideration of the change of use to hotel, each part is taken in turn below.

99. Officers consider that the principle of the loss of office floorspace has been established as acceptable in this instance (as discussed above in the Loss of Office Floorspace section of this report), and the change of use to a hotel (C1) would not prejudice the primary business function of the City. Furthermore, the proposal would not result in the net loss of an existing visitor, arts or cultural facility.

100. It is considered that the change of use to a hotel would not likely result in the over provision of hotels or cause an imbalance of land uses in this location.

101. Both policies DM11.3 and CV4 require the proposed development to protect the amenity of neighbouring occupiers. The closest neighbouring residents are those located at Sugar Quay which is situated to the east of the application site on the opposite side of Water Lane. As set out in the Noise and Vibration section of this report (see below), the proposed development is considered to have an

acceptable impact on the amenity of neighbouring occupiers subject to the imposition of conditions and S106 obligations.

102. Policy DM11.3 requires for there to be a satisfactory arrangement for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel, in addition to this, policy CV4 also requires satisfactory arrangements for waste storage and taxis. As set out in the Highways and Transportation section of this report, the proposed development is considered to provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles, coaches, taxis and for waste storage subject to the imposition of conditions and S106 obligations.

103. Policy DM11.3 requires at least 10% of hotel rooms to be wheelchair accessible and policy CV4 requires developments to meet the accessibility standards set out in the London Plan. As set out in the Accessibility and Inclusivity section of this report, the proposed development subject to final details being secured by condition, would comply with the requirements of policy DM11.3 of the Local Plan 2015 and policy CV4 of the emerging City Plan.

104. Both polices DM11.3 and CV4 state that proposals should ensure continuing beneficial use for historic buildings and policy CV4 goes onto state that this should include enhanced and inclusive public access to and interpretation of heritage where appropriate. As set out in the Heritage section of this report, the proposals would ensure a continued beneficial use for the building and would include enhanced and inclusive public access to and interpretation of heritage and would therefore comply with the requirements of Policy DM11.3 of the local plan and policy CV4 of the emerging City Plan.

105. Policy CV4 requires the provision of active frontages at ground floor level including facilities accessible to the public. The relevant parts of CS9 and S17 seek to improve vibrancy along the river front. The quayside elevation would be the most active of the four elevations, with a cultural café and Galleries accessed via the quayside which would be open to the public would and be provided at ground floor level. In addition, on this elevation, would be the raised terrace serving the restaurants and activation areas within the quayside which would activate the newly opened-up quayside. The Lower Thames Street elevation would provide access to the hotel reception area and would be one of the entrance/exit points for the newly created public route through the building which leads to quayside and vice versa. On the Old Billingsgate Walk elevation, a separate entrance would be provided for the basement spa and health centre which is accessible to the public and also along this elevation Old Billingsgate Walk would provide access to the newly opened-up quayside. Overall, it is considered that the proposed development would provide active frontages at ground floor level and improve vibrancy.

106. Policy CV4 requires hotels to be in suitable locations that provide access to attractions, workplaces, and other destinations in and outside the City, including via public transport. As set out above the application site is within the CAZ of which tourism and hotels is a key function, the proposed hotel is situated along the Thames riverside and is located within the proximity of underground and national rail stations which provide transportation to destinations that are not within walking distance of the site. The application site is also situated within the Pool of London Policy Area (discussed below in this report). As such officers consider that the proposed hotel is in a suitable location providing access to attractions, workplaces and other destinations in and outside of the City.

107. Policy CV4 requires hotel developments to address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials). As set out in the Sustainability section of this report (see below), the proposed development is considered to the address the sustainability challenges with the City's BREEAM priorities subject to the imposition of conditions.

108. In light of the above, and subject to the conditions and S106 obligations referenced, the provision of a hotel would be acceptable in planning terms and compliant with the London Plan policies SD4 and E10, Local Plan CS11 and DM11.3 and polices S6 and CV4 of the emerging City Plan 2040.

Provision of Other Uses

109. As set out above, the other proposed uses proposed as part of the hotel-led mixed-use redevelopment are set out below and each will be assessed in turn.

- 1,599sqm (GIA) of basement spa and health centre (Use Class E(d))
- 1,993sqm (GIA) of ground floor food and beverage, public north/south route, gallery and events space (Use Clas Sui Generis).

110. At basement level, a spa and health centre are proposed which has a Class E(d) use class. The spa and health centre including a swimming pool would be provided with an independent access on Old Billingsgate Walk and would be open to the general public and to hotel guests.

111. At ground floor level, food and beverage floorspace, along with a public north/south route, gallery and events space which has a Sui Generis use class is proposed. These facilities would be open to the general public and to hotel guests.

112. The application site is not situated within a Principal Shopping Centre nor is it located in a Retail Link. Officers consider that these uses are complimentary uses in the hotel-led mixed-use redevelopment and are typical to be included alongside visitor accommodation. The principle of the proposals incorporating

other uses within the mixed-use hotel led redevelopment is supported as they would contribute to providing a mix of uses on the site, available both to the general public and to hotel guests. These uses would be in compliance with part 2 of policy S19 of the emerging Local Plan through the provision of retail, cultural and leisure uses. These uses are also considered to improve vibrancy along the riverside as required by policy CS9 of the Local Plan and S17 and S19 of the emerging City Plan.

Economic Considerations

113. The submission sets out that the completed development would provide 200 full-time equivalent and 80 part-time end user jobs.

114. The NPPF places significant weight on ensuring the planning system supports sustainable economic growth, creating jobs and prosperity.

115. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities Series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measures by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.

116. The National Planning Policy Framework establishes the presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local businesses needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.

117. The City lies wholly within London's CAZ where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Market Projections), that the City of London employment will grow by 176,000 from 2016 to 2041. CAZ policy and wider London Plan policies acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

118. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place, and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for

creative innovation. Local Plan and emerging City Plan policies seek to facilitate a healthy and inclusive City, new ways of working, delivering the accommodation, facilities, attractions and infrastructure required for a leading destination, creating a more vibrant and diverse retail economy, enhancing the City's evening and weekend economy, securing improvements in the public realm, urban greening, and a radical transformation of the City's streets in accordance with these expectations.

119. It is considered that the proposed development would in principle support the above aims.

Design, Heritage and Public Realm

120. This section assesses the architecture, design and public realm of the scheme as well as considers the impacts upon heritage assets. Consideration of strategic views is assessed separately in a later section.

121. The relevant policies for consideration as relate to design and heritage include: Local Plan 2015 Policies: CS10 Design, DM10.1 New Development, DM10.8 Access and inclusive design, CS12 Historic Environment, DM12.1 Managing change affecting all heritage assets and spaces, DM12.3 Listed Buildings; Emerging 2040 City Plan Policies: S8 Design, DE1 Sustainable Design, DE2 Design Quality,DE8 Lighting, S11 Historic Environment, HE1 Managing Change to the Historic Environment; and London Plan 2021 Policies D3 Optimising site capacity through the design led approach, D4 Delivering Good Design, D5 Inclusive Design, HC1 Heritage Conservation and Growth, HC3. This is in addition to the relevant sections of the National Planning Policy Framework, the National Design Code.

122. Additionally as relates to public realm, policies for consideration include: London Plan 2021, Policy D8 Public realm, Policy T2 Healthy Streets; City of London Local Plan (2015) Policy DM10.4 Environmental enhancement, Policy DM16.2 Pedestrian movement, Policy CS19 Open spaces and biodiversity, Policy DM19.1 Additional open space; Emerging City Plan 2040: Policy S10 (Active Travel and Healthy Streets), Policy AT1 (Pedestrian Movement, Permeability and Wayfinding) and Policy DE3 (Public Realm) as well as Supplementary Planning Guidance City of London Public Realm SPD and City Public Realm Toolkit.

123. Comments on the scheme have been received from Historic England, the Georgian Group, Save Britain's Heritage, Historic Building's and Places as well as other heritage organisations and third parties. These are set out in detail elsewhere in the report and in the background papers. The comments raise no objection to the scheme subject to appropriate conditions being attached to the permission, highlighting fabric of particular significance within the Long Room,

Kings Warehouse, West Wing and Quayside, noting the importance of public access and any structural implications.

124. Officers have considered these representations and carefully afforded them considerable importance and weight, further referenced in the below assessment.

The Site

125. The site is prominently located on the river Thames at Lower Thames Street, bounded by the River Thames to the south, Lower Thames Street to north, Water Lane to the east and Old Billingsgate Walk to the west.

126. The principal building within the site is the grade I listed Custom House, a large neoclassical building with its principal frontage facing onto the river to the south. The existing the building comprises the latest in a series of structures designed for the collection and payment of import and export duties.

127. Custom House is located on the Custom House Quay, set back approximately 22m from the river front with an open area of hardstanding used as a Carpark with a basement access ramp together creating a large terrace to the river front. The terrace is enclosed by tall railings, separating the full extent of the open area from the public path along the river front. At present the current character of the terrace is hostile and inaccessible to the passerby, with access controlled via a security hut to the east. The river path is fenced off from the terrace, limited to a narrow stretch of path directly adjacent to the river. Frequent flooding often makes this stretch of the path inaccessible.

128. Custom House was previously occupied by Her Majesty's Revenue and Customs (HMRC) or iterations thereof since the early 19th century. It is arranged over basement, ground and first to third floors. The building is internally divided into three distinctive blocks, (i) the central block (ii) the eastern wing, and (iii) the western wing. The quayside area between the building and the Riverside Walkway was most recently privately occupied as a car parking area for the use of HMRC. While historically the Quayside was publicly accessible, it has in more recent years been closed off due to the operational and security requirements of HMRC. HMRC vacated the building in June 2021, and it has remained vacant since.

Summary Site History and Phasing

129. The existing building has a complex history, creating distinct phases of work subsequently reflected in the location, age and extent of historic fabric remaining on site. As the site of enforcement of Custom dues and levies on goods entering and leaving British ports, the importance of Custom House is fundamentally bound up with its intended use and role in the production of considerable revenue for the state on this site from the Medieval times onwards. The building's interior design and plan form is directly related to the

bureaucracy accompanying the collection of Customs, requiring direct riverside access, the storage of goods and record-keeping. As such Custom House is one of the 'great survivors' of the history of shipping and consequently can be understood to have played an intrinsic role in the growth and success of London over the centuries.

130. While there has been a Custom House at this site at the top of the Pool of London since at least the Middle Ages, the first iteration of current Custom House commenced towards the end of the Napoleonic Wars, to designs by David Laing. As a student of John Soane, Laing's design was celebrated for its elegant use of the Greek Revival Style in three monumental wings with interior courtyards to the east and west created a palatial frontage to the river. Internally flat 'Soane' domes to the grand interior captured in contemporary engravings were grandiose in scale, creating a sense of theatre to the administrative function of the building which was matched by a giant sculptural frieze to the central wing's southern river elevation. Failure of key timber pilings however led to catastrophic collapse soon after its completion, including the destruction of the central portion of the building which housed the key circulation spaces of the Long Room, where business was exchanged, as well as the King's Warehouse below.

131. A second architect, Robert Smirke was brought in to undertake the rebuilding of the central portion, and this included a new Long Room at first floor, and Kings Warehouse below. Smirke, also a pupil of Soane, whilst adhering to classical architectural language of the earlier building, rebuilt the central portion in a more severe muscular style. These designs included a large grant central portico and pediment. Additionally further underpinning took place to secure the remaining Laing fabric, with a number of alterations to the interior circulation, courtyards and entrances onto the quayside. Movement through the building was carefully choreographed and idiosyncratic, with individual parlours and room sets creating a complex functional hierarchy to the interior, directly related to the administrative posts concerned with the customs collection process such as the 'tidewaiters' and 'searchers'.

132. As well as the west wing, external elements to survive from the Laing era includes the river wall and steps along the terrace to the south, completed in 1817-19. The engineering for the quay, river wall and steps is associated with John Rennie, the engineer of London Bridge and later Waterloo Bridge, the founder of a dynasty of structural and mechanical engineers. The new stairs replaced earlier steps which provided river access to the parishioners of St Dunstan's, indicating the important domestic role of the river to local communities at that time. The two cranes standing on the quay today include, the western crane, which dates to the 1820s or 30s and most likely originally located at the entrance to the King's Warehouse and the eastern crane, which is of a similar date but mostly likely installed during Smirk's rebuilding works across the site.

133. Further damage across the site arose during World War II, with the almost complete destruction of the east wing. This wing was rebuilt post-war in 1962-66 to designs by F L Rothwell and H G Hexley of the Ministry of Public Buildings and Works, formally reopened in 1966. Rothwell and Hexley created an almost complete facsimile of the lost exterior façade but with a wholly modern interior structure, including a reinforced concrete frame. The interiors are entirely modern interiors, including at basement and floor to ceiling heights that in places do not conform to the arrangement of fenestration.

134. The plan form and fabric to the east wing interior is therefore consistent with the administrative use of a building of this period, resulting in a very different floor plan and much reduced decorative character to the historic central and western wings. The quayside is believed to have been used as a car park from the 1960s onwards. The present fence along the edge of the wharf appears to be installed in the 1990s and is of a notably less decorative appearance than the older cast iron railings which appear in historic photographs. The original ornate iron gates to Lower Thames Street adjacent to old Billingsgate Market were removed in 1965 when the present brick pier, wall and car parking arrangement was created (ref. 0487N). The present gate posts to the eastern end are 1990s reproductions.

135. 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).

136. As existing the building therefore generally conforms to the following key phases:

1. The western wing of the building and remaining brick basement arches and partitions associated with Laing. With some modifications relating to the circulation and creation of the ‘Robing Room’ at first floor by Smirke (1817-1825).

2. The River Wall (the work of the engineer, John Rennie), Stairs, Cranes and Quayside (separately listed at Grade II*) (1817-19).

3. The central wing associated with Smirke including Long Room, King's Warehouse and grand portico facing the river (1825).

4. The post-war rebuild to the eastern wing (1966-1991).

Summary of Significance

137. This section assesses the significance of heritage assets within the site boundary. All other heritage assets potentially affected by the proposals are assessed later in the report.

Custom House, Grade I

Historic

I. surviving Georgian purpose-built office ensemble, considered one of the earliest purpose-built office suites of this scale to survive in the CoL, ancestor to the development of the modern City office type.

Architectural

I. High interest as an example of neo-class Very high historic interest as the latest iteration of a series of Custom Houses which have occupied the site since at least the Middle Ages, thought to be the largest of this building type constructed in the Commonwealth.
II. Very high associative historic interest as a key site of exchange, evidencing London's role at the heart of a global trading commercial empire, and the essential contribution that shipping, both naval and commercial played, as well as the financial systems that ensured the empire's continuance.
III. Very high communal and historic interest as a building with clear connections back to the Transatlantic Slave Trade, as a key site of documentation and taxation and so directly evidencing the production of wealth for Britain through the Slave Trade.
IV. Very high historic interest as a manifestation of historic commercial and industrial activity along the river front and its importance to local populations, demonstrating access to the river front in Georgian London.
V. Very high social historic interest reflected in the hierarchical nature of the circulation and planform, evidencing the complex social structures within the merchant and naval communities of Georgian London, creating a 'theater' of administration which oversaw the processing of all traders and travellers to London arriving by river, including spaces for the 'Tide-Waiters' 'Landing Waiters' and 'Searchers'.
VI. High historic interest arises through theicism and the 'Greek Revival' movement on a monumental scale in a prominent location, demonstrating the influence of John Soane across institutional buildings.
VII. Moderate associative interest through ties to the architect Sir Robert Smirke, and to a slightly lesser degree David Laing.

VIII. Moderate evidential interest through the use of innovative fireproofing techniques including the concrete foundations and cast/wrought iron structure. This includes iron columns (Tuscan on the ground floor, Doric in the basement), iron beams up to 30' long and cast-iron fireplates to ceilings, changing to slate at second floor. The ironwork was undertaken by Foster, Rastrick and Co. of Stourbridge.

IX. High interest through the decorative and spatial character of the Long Room, Tidewaiters Rooms, Robing Room and King's Warehouse, all unique survivals from Georgian London, illustrating the careful choreography of the circulation within the building's interior.

X. High evidential and artistic interest arising through the craftsmanship of the building's construction. This includes high quality historic details such as: sash windows with fine mouldings to the glazing bars; ovoid metal work to fan-lights; detailed bespoke cabinetry which evidence the specific use of the Long and Robing rooms; decorative plasterwork cornices; door surrounds and skirtings; metal jack arches to King's warehouse and vaulted ceilings at basement and ground floor; grand historic fireplaces and panelled timber doors throughout.

138. The submitted gazetteer, significance and phase dating plans provide a thorough overview of where sensitive and historic fabric remains, and these in general reflect the relative contribution to significance of each area in question. The assessment undertaken in this report draws upon the findings within these studies.

139. It should be noted that all fabric associated within the post-war rebuilding works is of much reduced sensitivity and its significance is generally limited to the degree to which it;

i. forms a cohesive frontage with the surviving historic stone work and

ii. as an interesting, prominent example of mid twentieth century conservation-led architecture.

140. Equally the 90s adaptation of the building has resulted in a number of regrettable additions, particularly in the lift core to the west wing courtyard and associated stair and plant rooms.

Contribution of Setting

141. The setting of Custom house reflects the transformation of the City over hundreds of years, and the overall contribution of setting is therefore layered and varied, ranging from positive, to neutral and in some cases adverse. Positive contributions in the main arise from its prominent riverside location, illustrative of its historic functional relationship with the river which is intrinsic to its original use. In the same vein, the immediate location reflects the site of the Pool of London as a strategically important area of deep water, enabling sailing ships to dock and offload goods, providing a tangible understanding of the

importance of the river for the growth of London and capitalisation on the ready flow of goods into the City.

142. The riverside location enables extensive views towards its grand southern elevation, including the central portico. This includes views from the south bank, London Bridge and Tower Bridge, where Custom House forms part of the foreground in which the whole of the city skyline is appreciated. The prominence of the Custom House in these views is symbolic of the critical importance of the building to the success and growth of both Georgian London as well the wider prosperity of Britain at that time. Views from Old Billingsgate and Sugar Quay jetties allow a better appreciation of the composition of the southern façade and take in the water front together with the quayside including the listed river wall and steps, which when seen together with the building's façade create a functional and decorative ensemble. This element of setting accordingly makes an important contribution to significance.

143. Custom House in these views forms a group with other lower level historic structures along the river front, including Old Billingsgate Market to the west, also a building linked to historic commerce and exchange. The two buildings are appreciated together in sequential views from the riverside walk to the north bank, approaching from the west.

144. More immediate local views towards the building from the riverbank are marred by the extent and fenced off nature of the hardstanding to the south of the building, which is currently largely used as a car park and is in poor repair. While historic photographs show a range of low railings to sections of the terrace perimeter, these are much lower than the existing light blue railings. The large basement ramp is particularly unfortunate, creating a modern nondescript backland character within this important riverside location, the existing car park and basement ramp is an element of setting that makes a negative contribution to significance. While this space was always functional, as indicated by the location of the listed Cranes, the historic character and use of the quayside is not readily discernible, with the relationship to the river itself screened off by fencing. Also notable is the addition of Plane Trees to the river terrace in 1910, which perhaps indicate the reduced traffic of goods directly loaded on to the quayside, but nonetheless create a pleasant leafy character to the waterfront.

145. The dual carriage way along Lower Thames Street and large contemporary buildings to the northern side of the road diminishes the contribution of the area to the north, however views together with and from Old Billingsgate Market enable a consistent historic townscape along a large stretch of the road. The alignment of the road is such that these views are unfolding in nature rather than taking in the full extent of the façade.

River Wall, Steps, Cranes and Quayside to Customs House, Grade II*

Historic

I. High historic interest reflecting investment and development of the waterfront, indicating the strategic importance of the river to trade.
II. High evidential interest illustrating the engineering techniques and construction methods of the time.
III. High associative interest through connection with John Rennie.
IV. High rarity value as two early and well-preserved cranes, illustrative of the transition from cast-iron to composite cast and wrought-iron construction;

Architectural

V. High interest through their impressive scale and virtually intact structure.
VI. High group value with Custom House to the north, sharing an intrinsic functional relationship.
VII. The use of high quality granite and cast iron retains material interest and speaks to the ambitions of the project.
VIII. Moderate associative interest as a remnant of the earlier Liang scheme before the Blitz damage and rebuilding work by Smirke.

146. It should be noted the steel handrails are modern and not of interest.

Contribution of Setting

147. As set out above, the river wall derives much of its significance from its riverside location, underscoring the impressive feat of its construction, its direct role in securing the efficient offloading of goods as well as facilitating views of both the quay and Custom House together. The overall contribution of setting is therefore considered to be high, diminished by the late twentieth century high railings which divorce the quayside from the cranes, obscuring an understanding of their inter-related historic functions. The use of the quayside as a carpark obscures the importance of this space to the function of the riverfront.

Proposals and Assessment of Impact

148. Works to the site are considered in turn, grouped as appropriate according to location and/or nature of impact upon the heritage assets. This approach is considered to be proportionate to understand the impact upon significance as per paragraph 207 of the NPPF.

149. In summary the works comprise:

- The provision of a new terrace with incorporated steps and ramp to the quayside;
- The reopening and adaptation of doorways and windows to external facades;
- Further external works regularising the courtyards within the east and west wings, removing later fabric;
- The restoration and adaption of all windows to provide improved thermal and acoustic performance, secondary glazing and external blinds.

- The reorganisation of plant at roof level at the east wing, resulting in a slight roof extension within this wing.
- The stripping back of twentieth century service ducts and later partitions to the interior.
- The conversion of the interior to hotel rooms, including new partitions, risers and circulation spaces.
- The restoration of key spaces including the Long Room, Kings Warehouse, Tidewaiters Room and Robing Room.
- The conversion of a secondary Laing era route through the west wing to use as public café and gallery space.
- The conversion of the basement to provide a SPA, staff amenity, plant and office space.
- A broad range of public realm improvement works including the reopening of the quayside, expansion of the publicly accessible area of river frontage, removal of the carpark and basement ramp and replacement and extension of the flood wall.

150. The works are assessed in turn, first addressing the exterior changes, then interiors and finally the landscaping and public realm.

Exterior

Riverside Terrace to Central Wing

151. The proposals seek the creation of a new terrace, steps, seating and ramp to enable access from the Kings Warehouse onto the quayside and secure a public step-free route through the building from Lower Thames Street onto the riverside. The designs for the terrace have undergone extensive negotiations with the applicants, seeking to balance the requirements of:

- retaining the necessary space to allow flooding along the quayside;
- minimise intervention, covering up or loss of historic stone work;
- deliver appropriate activation and dwell spaces to the quayside;
- create best in class approach to inclusive step free access into the hotel and;
- produce a design that sits comfortably within the Greek revival style of the existing facades.

152. Critically the designs had to incorporate a flood wall to mitigate against predicted 2100 flood levels and ensure any conflict between the step free route is avoided, whilst leaving enough open space along the quayside to facilitate ease of movement along the river path. The approach taken has sought to deliver a piece of architecture that appears part of the quayside, retaining the stripped back functional character of the riverside which goes to the heart of the building's significance and key contribution of the southern facade and river front in particular.

153. As such the terrace is composed of symmetrical sweeping steps which also provide seating, with two ramps set behind, approaching from the east and west, meeting in the centre to reach a series of terraces and flood wall which creates an open area of seating and circulation space either side of the main entrance. The overall proportions of the terrace has sought to limit the overall height to allow an appreciation of the existing southern façade's composition and character to be retained, rising to just below the existing door openings. An incised handrail is incorporated into the elevation of the terrace, noting that conditions have been added to ensure the terrace ramp can be delivered to appropriate gradients to avoid the need for landings.

154. Granite was selected as the main material to blend with the existing sets to the quayside and create a discernible contrast to the retained Portland stone of the main facades. The elevations of the terrace are simply decorated with bands of rustication and a chamfered top. While the existing steps and blocks accessing the central entrance are to be removed, these materials are proposed to be re-incorporated within the new structure. Similarly the separately listed Crane is proposed to be relocated within the new terrace, allowing an appreciation of its functional historic relationship with the quayside and custom house to remain. Given this element has already been re-located this is considered to have a neutral impact upon this grade II* listed feature. Conditions have been added to ensure its appropriate removal, repair, storage and reinstallation. A bronze handrail is proposed to the terrace perimeter using a simple rod design, with curved connection to the hand rail above, taking inspiration from 'tablet' fan light detailing to the interior.

155. Overall a low level of less than substantial harm is considered to arise through the creation of the terrace, to the extent that it obscures the lower most levels of the southern façade, and removes the existing Smirke era steps. It is noted these steps reflect a secondary phase of works, and are not considered of the very highest sensitivity, reducing the severity of impact to significance through their removal and re-siting. Relatedly, while the terrace will reduce the present open extent of the quayside, with a low-level of less than substantial harm arising through the degree to wish this reduction obscures and understanding of the use of the quayside as an active wharf it is considered that these harms have been reduced as far as practicable, and are critical to the delivery of the new proposed use. To that end, while a low level of less than substantial harm remains through the creation of the terrace, this harm is considered to be justified in the context of the scheme, noting the exhaustive testing of alternate options throughout the pre-application process as outlined within the Design and Access Statement.

156. Importantly the delivery of a step-free route through the building and onto the quayside, dramatically improves accessibility across the site and into the building, integral to the aspirations of the Local and emerging City Plans.

Facades

157. Proposals to the facades have sought to minimise interventions and prioritise the preservation of earlier phases of fabric. The overall scope of the external alterations is minimal, limited to where necessary in order to reasonably facilitate the change of use to hotel and maximise the accessibility of the public realm. Where possible, the repair and restoration of historic details and materials are to be undertaken, seeking to retain an authenticity to the material palette.

158. In general, works to the facades include the repair of the existing stone and masonry to the north, south, east and western facades. A detailed gazetteer has been produced identifying areas in need of repair, including areas of cracking and inappropriate cementitious or plastic render throughout, posing risk of more substantial deterioration over time. All repair works will be controlled via specific conditions to ensure appropriate methodology and techniques are used dependant on material type. Where cleaning is proposed appropriate DOFF cleaning methods have been selected, with careful limits on the abrasive quality of the techniques selected. These works will include the retention of a degree of patina to the external areas. These works are considered to be low beneficial impact to significance ensuring the longevity and retention of remaining historic fabric.

159. Alterations to existing external openings are proposed replacing or adapting existing doors and windows. In detail the proposals use panelled painted timber design to the proposed doors, finished in dark brown paint. While this colour is a change from the prevailing white, the selected colour is considered to be appropriate to the age of the building, preserving the overall classical character of the façades. The final finish of all new or adapted openings is to be controlled via condition. Addressing each wing in turn, at the West Wing the works include the dropping of cills at two windows within the ground floor, to provide direct level access into the proposed Café from the quayside, as well as from the north west corner along Lower Thames Street. The location of these opening up works has been informed by the original layout according to the Laing era circulation of the building. Consequently cills are only dropped where they reflect the location of a historic door. Therefore while these works include the removal of stonework, harm arising through its loss is considered to be partially mitigated by the recreation of Laing era plan form and façade composition. The designs comprise new timber panelled painted doors and incorporate a glazed fan light above, ensuring the height, arch and rusticated surround of each existing opening is retained. The glazing bars to the fan light replicate the layout and moulding of each upper sash as existing, to be secured via condition. In detail the new doors are considered to reflect an appropriate response to the existing character and contribution of the window openings. Signage for the café is proposed to be incorporated into the new fan-light using discrete non illuminated suspended lettering. This detailed approach ensures the alterations sit comfortably alongside the remaining windows, with the final designs and methodology of the removal and making good of historic fabric to be controlled

via condition. The overall harm arising is therefore considered to be sufficiently minimised and justified, overall low in magnitude and less than substantial.

160. In the central wing at the ground floor, four window cills are proposed to be dropped and the existing central door-set to the southern façade retained but adapted to enable step free circulation from the terrace into the Kings Warehouse. To the central door set, these works retain the existing proportions of the panelling but removes external obtrusive lighting, hardware and cabelling. Where cills are proposed to be dropped, this will remove stone work associated with Smirke's rebuilding of the central wing, with some harm arising, however the extent of ground floor alterations are considered to be minimised, retaining the overall rhythm and composition to the facade and in general is limited to ensure the safe running of the hotel and enabling the public route through the building and enjoyment of the historic interior. The detailed design is similar to the new doors proposed in the west wing, but using a double door design. As above, the doors are to be timber panelled double lead design, incorporating nine light glazed upper panels, with existing patterns of glazing replicated, retaining the dimensions and reveals of the arched opening as existing.

161. Within the northern façade the existing three sets of doors onto Lower Thames Street are to be retained and adapted, inserting glazing into the upper and central panels, with the glazing design replicating oval fan light design details found in the interior. The existing step is also proposed to be removed enabling step free access at this location. Repairs are required to the stone surround and reveals to each doorway, with cementitious render repair requiring removal and making good. The works retain the coats of arms and sculpture above the central door which will be retained and repaired. While this will alter the appearance of this entrance, the overall Georgian character and majority of the existing fabric is retained. As such the harm arising has been minimised and is considered to be low in magnitude and less than substantial.

162. At first floor five existing windows looking from the Long Room onto the portico are proposed to be adapted, lowering the cills to five and a new doorway created within bays two and four. As above, the existing glazing bar pattern has been replicated at each window, creating a nine light, top fan light, over a six light lower glazed sash and/or door respectively. These doors are all inward opening, allowing external access above the portico which will be used as a terrace. The works retain the decorative external architraves and surround to each opening but remove the stringcourse from this central selection. The new terrace above the portico incorporates porcelain tile to the floor and a new 1100mm bronze handrail, which uses a simple rod design to appear unobtrusive in views. Four new steps and a landing with handrail are proposed to access the terrace from each door, avoiding the need to build up the terrace level, which would have an unacceptable visual impact.

163. Within the east wing it is proposed to restore more appropriate detail to the existing central entrance to the southern elevation. The existing door set is entirely mid to late twentieth century in date, and utilises a revolving door no longer considered appropriately accessible. The proposals include the installation of a new glazed timber panelled double door, with glazed side lights and fan lights over, retaining the proportions of the existing. The existing sandstone steps are also proposed to be replaced in granite, creating access onto the quayside and reinstating Smirke era decorative palette. As part of the rebuilt post war works to the east wing, this fabric is altogether considered less sensitive to change, and the overall impact of these works is considered to be low beneficial through the recreation of more sympathetic decorative detail.

Courtyards

164. New facades are proposed to the east and west wing courtyards. Within the west wing, while located in the earlier phase of works, the courtyard has been subject to successive alteration, including the insertion of a staircase, with curtain glazing and lift cores adjacent to the eastern courtyard elevation. These works have obscured the original rhythms of the façade and established a utilitarian character and irregular overall volume, diminishing the contribution of this space. The proposals seek to reinstate a rectangular volume to the courtyard and create a façade with a more responsive design more in keeping with the overall classical architectural character. As such the proposals seek to raise the overall ground level to enable its use as an amenity and circulation space, whilst regularising the line of the eastern elevation to create a uniform appearance and step free route north-south. Two new lifts are proposed to replace the existing modern stair, using this less sensitive location to provide necessary vertical circulation. The facades use a simple glazed panel design, drawing on the proportions of the historic elevation on the courtyard and aligning with the historic window openings to the courtyard. The use of glazing allows an understanding of the original courtyard volume to remain appreciable. The simple bronze framing to the glazing is repeated in the rebuilt inner elevation, using bronze surrounds to the new openings within a painted brick facade. As with the glazed elevation, the placement and proportions of existing window openings to the courtyard have dictated the datums of the new fabric, creating an honest contemporary addition that is sympathetic to the existing character. The overall impact of these works is considered to be low beneficial through the removal of clutter to the courtyard interior and reinstating a sense of the simple volumes which characterise the historic fabric. The detailed design of the new elevations include glazing opacity, colour, depth and framing are all to be controlled via condition.

165. Within the east wing the proposals remove the existing utilitarian non-descript curtain wall glazing and rebuild each courtyard façade in mirrored frit glazing with bronze framing to create new bedrooms. The existing curtain wall is of no interest and its replacement is considered acceptable. A central corridor

crossing the courtyard is also inserted and finished in glazed tile. The material palette and proportions used are considered to be high quality and more in keeping with the decorative classical architectural character of the central and west wings, albeit executed as a honest contemporary addition. The impact of these works is considered to be neutral.

Roof

166. The approach to the proposals at roof level responds to the relative contribution to significance of each wing, noting the particular sensitivity of the west and central wings, as well as the importance of retaining a symmetrical appearance in long views along the river front. The east wing presently houses the majority of roof level services for the building, and its relative contribution to the external appearance of the building is reduced through its later age and level of intervention, being generally less sensitive to change. The existing services have been successively adapted over time, with no heat recovery incorporated. In order to minimise the need for interventions within more sensitive fabric elsewhere, the proposals seek to maximise this area for the provision of necessary plant work. As such the proposals seek to consolidate the existing plant at this level into a single plant room, in set away from the roof perimeter, to create a continuous enclosure around the edge of the courtyard, with a lift overrun and cores located to the centre at the join with the central wing.

167. To enable adequate air circulation and maintenance access, this includes an open break in the slope creating a split in the roof pitch. While the upper levels of this plant room will be visible, the roof adopts a sloped profile to continue to the angle of the existing monopitch, with both slopes to be finished in matching slate to aid the appearance of a single roof form, details of which will be agreed through condition as a result of consultation responses. The location of louvres is limited to the top rather than side elevations so that these will not be visible from ground. However these works do result in the raising of the overall roofline of the east wing, slightly unbalancing the symmetrical appearance of the whole roof structure across all three wings, with a low level of less than substantial harm arising through this impact as well as through the split appearance of the pitch, which will be discernable as a modern intervention, noting this will be only generally perceptible from longer range views from the southbank. Following the submission of the proposals, alternative dimensions and materials to the plant room were requested and considered by officers, however these alternatives necessitate a larger, more obtrusive break in the overall roof line or exposure of the plant work itself or more complex and distracting overall geometry. As such, while harmful, it is considered the proposals to the east wing reflect a scenario where the harm has been minimised as far as possible, noting the desirability to conserve the more sensitive west and central roof forms.

168. Within the west wing, the approach has been to limit intervention to where the modern insertion of the existing lift, stair core and plant room already establish a reduced sensitivity to alteration. As such the proposals retain the existing

plant room, creating an extension to its western elevation, encompassing the footprint of the existing ducts within the courtyard. The overall impact of these proposals is considered to be neutral, given the utilitarian character and modern age of the fabric effected. The consolidation of these new elements and opportunity to provide more sympathetic material finishes is welcomed, with some benefits arising from the creation of a more unified façade around the courtyard. This in part mitigates the slight diminishment of overall volume to the lightwell interior.

169. Additionally, three new dormers are proposed to the west, allowing access from the stairs into the guest rooms at the upper level, as well as the removal and making good of five twentieth century lanterns and five roof lights. These works are considered to create a low level of harm in the removal of historic fabric. The impact of these works is in part justified in through the securing of a better thermal performance through their removal, in-turn reducing the overall requirement and volume of plant needed to deliver the scheme. As such, when viewed in the round this aspect of the proposals is found to be acceptable, subject to the discharge of conditions securing the appropriate making good and materials used in the remaking of the roof form.

170. Within the central wing solar panels are proposed to the inner roof slope. Given the sheltered location this is considered acceptable, having no impact upon sensitive viewpoints whilst maximising the overall energy efficiency and is in line with the aspirations of local policy. This aspect of the proposal will be subject to detailed conditions controlling the technical specification of any solar panels and method of fixing.

Windows

171. All the window types have been assessed under a detailed schedule within the gazetteer, noting existence of historic frames, glass, mouldings and any later repairs or interventions such as secondary glazing. The proposals include a number of interventions seeking to improve the thermal performance and reduce the overall volume of plant to sustain the proposed new use whilst also providing adequate noise mitigation. The proposals therefore include the retention of all historic frames, replacing the individual outward panes with slim line double glazed conservation standard ‘histo glass’ or restoration laminate single glazing, dependant on the state of the existing frame, its depth and ability to withstand intervention. All historic glass will be retained and re-provided within the internal courtyards. Where modern window frames of no interest are identified in the survey, these are to be replace with like-for-like replicas of historic frames on site. These works will be controlled via condition to ensure the appropriate glazing is used on a window by window basis, in accordance with the submitted gazetteer. To Lower Thames Street along the north and west elevations will include the addition of secondary glazing to mitigate the noise from the dual carriage way. Two methods of installation are proposed dependent on historic panelling to the window reveal and the depth of the

frame, ensuring on a case by case basis minimal intervention is used, and retaining the contribution of each frame to the decorative appearance of each room.

172. These works were subject to detailed negotiations at pre-application stage. While these works will alter the location of historic glazing, with a low level of less than substantial harm arising through the cutting into historic frames, on balance it is considered acceptable given the opportunity to rectify where modern inappropriate windows have been inserted and minimising the need for more intrusive works to deliver adequate acoustic and thermal performance.

173. Assessment of the facades and historic documentation found evidence of blind boxes throughout the building. The proposals seek to install blinds on the southern elevation of the East and West Wings. While this will alter the character of these elevations, it is considered in general sympathetic with the existing character, with persuasive evidence that this was a historic feature of the facades and reducing the need for addition air cooling to the interior. The overall impact of the installation of blinds is considered to be neutral subject to detailed conditions controlling the design of the blind box, proportionality to each specific window, the method of fixing and mechanisation of the awning.

Interiors

Hotel Rooms

174. A key part of the building's significance resides in the overall intact quality of the plan form, as well as the retention of the 'enfilade' sequencing of room sets around the main corridor at ground and first floor level within the west and central wings. Allied to this is the retention of symmetrical and balanced room volumes, which while plainly decorated, are commensurate with the administrative use of the building throughout its history. The conversion to hotel use requires the installation of WCs, bathrooms and service risers throughout the building, to a degree disrupting and diminishing this in-tact quality. While each intervention is relatively small in relation to each room, when considered cumulatively across the whole building, and particularly given the direct impact on a sense of an in-tact plan form, the resulting harm is moderate in magnitude, albeit less than substantial in the language of the NPPF.

175. This aspect of the proposals has undergone extensive scrutiny at pre-app and was subject to negotiation alongside amenity groups and Historic England. Through this process it is considered that the harm arising through these interventions, which affect extensive amounts of historic fabric,, has been minimised as far as possible. To that end the proposals seek to reinforce existing room sets where possible to provide bathrooms within adjacent connected rooms. Where the existing layout prevents this, bathrooms are formed using a 'pod' style with new risers grouped together to form either a single vertical duct, mimicking a chimney breast in proportion and/or as a free-standing 'headboard' to the centre of each room. This approach has avoided

the need for sub-division of each bedroom, with the existing volume of the majority of rooms remaining, whilst providing necessary guest facilities at each floor. Adaptations to layout have been prioritised in areas of previous change, and the location of risers seek to replicate proportions dictated by the window layout and datums established by the skirting/cornice/panelling and door of each room.

176. Beyond the cutting through of floor plates to create risers, isolated losses of historic partitions and further subdivision of intact historic room volumes are as follows:

177. At ground floor, the loss of Smirke era partitions in corridor adjacent to the 'Wood Farm Office' and a new opening created to the Tide Surveyors Office as well as the closure of existing door to the basement steps; the subdivision of room RWG20, creating a bathroom in the western most bay. It is noted this space is already compromised by the substantial twentieth century mezzanine floor, reducing its overall sensitivity to change to a degree. At first floor the subdivision of the Receiver General's Clerks Office to create a pod bathroom; the opening up of Smirke era partitions between rooms RW1.22-1.25; the loss of a Laign era fabric west of the Surveyor of the Sloops Clerks, within the Syndicate Room and in the Previous Bench Officer's Room. At second floor, the subdivision of the Surveyor General's Office, and closure of the doorway and the division of the Custom's Annuity and Benevolent fund office. At third floor the subdivision of the Inspector General's Book Room, Northern European Jerquer room and within the Book Rooms to the northern elevation.

178. As above, when considered cumulatively with the opening up works to deliver the risers, officers find the overall level of harm is a moderate level of less than substantial.

Circulation

179. Further alterations amending the circulation throughout the building is required to deliver the new proposed use and adequate fire escape and accessible routes. These works include the break through of the floor plates at rooms G2-14, creating vertical circulation to the interior. At present this room retains its Smirke era dimensions, but has been successively subdivided to provide WCs, with modern interior finishes at every floor, albeit a number of historic doors are still in situ. The loss of the interior finishes is not considered to be harmful, however the breaking through of the floor plate in this location does fundamentally alter the circulation within the west wing, with a moderate level of less than substantial harm arising.

180. Similarly a new lift core and stairs are proposed to rooms RCH22-24, resulting in the loss of historic floor plates, as well as the decorative ceiling vaults, and lighter weight twentieth century glazed panelling which subdivides the spaces. This location is very sensitive to change as part of the entrance sequence from

Lower Thames Street, and the loss of fabric and potential impact to windows within the bay to contain the lift shaft is harmful, at a moderate less than substantial degree. It is however accepted that a secondary lift core is required in order to deliver the necessary circulation and safety throughout the building, and to that end is justified in this instance. To the eastern side of the entrance lobby, the mirror room set to RCH22-24 is also proposed to be converted to provide WCs at ground and first floors, with some harm arising through the subdivision and installation of necessary servicing.

181. The proposals will also remove the timber revolving door and panelling to the western entrance from Lower Thames Street into the west wing. This fabric, while not original is of clearly of an age and retains decorative and historic interest, with a low level of harm arising from its loss. However it is accepted that it creates a significant barrier to those with reduced mobility, and its removal is accepted in order to obtain adequate accessible entrances and fire escapes into and out of the building.

Doors

182. The proposals seek the retention of all historic doors whenever possible, in some case re-siting these where plan form changes require their loss. Equally fire proofing requires the provision of intumescent strips and new hardware in places. The works to all doors will be controlled via condition to ensure their conservation consistent with the relative contribution of each as per the gazetteer. While some harm arises through the removal or re-siting of these doors, this is considered to be minimised as far as possible, and justified to deliver the new use.

Long Room

183. As the administrative heart of the building, the Long Room retains a very high contribution to significance, with its grand dimensions and sedate classical detailing illustrating the importance and scale of the operations undertaken within the building, with fine river views accentuating a sense of grandeur. The original seating and desk arrangement along with the clerk's accommodation, do not survive, having been changed several times in the intervening two centuries. However, details such as the internal clock, retained from Laing's building, as well as the considerable cabinetry to the walls remains of interest, notwithstanding their exact date is unclear, generally accepted to be in-situ by 1900 and therefore of some historic interest. However the present timber counter is through to be a 1990s replica and is of little interest. The original circulation into the building has also been altered, blocking off several of the original entrances into the space including the central door set, as well as to the south west and centre of the eastern end.

184. The proposals to this space are minimal, principally to meet fire regulations. As such it is proposed to reinstate four doors to the northern and eastern elevations, in areas where an historic opening has been indicated. To the west

an existing doorway is to be widened to enable adequate fire escape. The door designs are to replicate existing historic doors on site, with full details to be controlled at condition, as appropriate adapting the existing cabinetry to retain the overall timber aesthetic of the wall treatment and continuing the pattern of panelling and finish to the interiors. Given the cabinetry has been altered over time and the openings are in part reinstating the historic circulation of the space, these changes are considered acceptable.

185. Importantly the upper eastern window at roof level is proposed to be re-exposed, restoring high level light into the space creating a benefit in heritage terms. Additionally a more sympathetic decorative scheme based on original paint samples is proposed, removing the anachronistic existing paint and gilt finish to the interiors. The final finish to the room is to be controlled via condition, including dimensions and moulding to all panelling, lighting, paint finish and flooring. The overall impact of the works, is considered to be neutral noting the loss of fabric and weighing against the benefits of restoring a more appropriate circulation and high-level windows into the space.

Kings Warehouse

186. The importance of this space as the store for all goods arriving London is hard to underestimate, however the gradual transition away from storage to more administrative use has altered the character of the space from what would have been a fortified area with direct functional access to the quayside, to a mid-twentieth century office fit-out, including the insertion of a mezzanine level. Fabric of interest chiefly remains in the cast iron columns and metal jack arches to the ceiling, indicating the use of emerging fire-proofing and engineering techniques, as well as the overall scale of the room. To a lesser degree, the substantial quantity of glazed timber panelling which currently subdivides the space is also interest. This panelling, whilst not associated with the rooms original use, retains a degree of interest through its obvious history quality. The level of opening up and ducting to supply servicing into the rest of the building is particularly intrusive within this space, creating an overly ad-hoc appearance which also obscures a sense of the overall room volume.

187. The proposals are for the adaptation of the space to provide a public route through from the entrance hall on Lower Thames Street on into to the quayside, accessible during opening hours of the hotel, reopening the existing central door within the northern interior elevation, which is currently blocked off. The relocation of the war-memorials to facilitate these works are to be controlled via condition. The space is proposed to be activated by a mix of food and beverage offers as well as vitrine gallery spaces, providing a programmable cultural offer. Servicing will be enabled via the new lightwell to the rear of the terrace, via the basement and behind re-positioned timber panelling which will create a vertical riser adjacent to the buttresses on the northern side of the room.

188. Some opening up works to the perimeter walls is also proposed, allowing fire escape and access into the east wing. This will necessitate the loss of some historic fabric, as will the loss of four small ancillary stairs to the north east corner and southern end of the room and the creation of a dumb-waiter to basement. While the opening up works will necessitate the loss of some historic fabric, it is noted the overall room volume is retained with the overall harm arising through these works consider to be minimised. The final layout and fit out of the space is to be controlled via-conditions, ensuring the re-use of the existing historic glazed panelling. Conditions will be added to include controls over the methodology for the removal, storage and reinstatement of the panelling as well as all servicing to the area and making good of the proposed new openings and installation of new doors.

Tidewaiters

189. This room is of particular significance, illustrating the idiosyncratic nature of the floor plan, and how this reflects the functional hierarchies of the building during the Georgian period. The character of this room as a parlour for a particular rank of custom's official is readily appreciable through its central location, large fireplace and four columns and coffered ceiling. A timber screen to the western door is though to be later in date but is still of an age and of some interest. Later opening up to the eastern elevation of this space is somewhat discordant and interrupts the otherwise symmetrical character of the space. The proposals are for the use of the room as the visitors lounge and library space. The works will remove the later inserted eastern entrance and restore a more appropriate door type accessing the courtyard. While some new FCU serving is proposed, this will be via discreetly located cabinetry below window cill level. The final decorative fit-out of the space is to be controlled via condition. The overall impact of the proposals for this space are considered to be neutral, removing the existing modern doorway, whilst retaining fabric of interest. The proposed use of the space to provide a study area for visiting researchers is also welcomed and retain a sense of circulation at the heart of this room's significance.

Robing Room

190. The robing room has a unique character, established through the unusual cabinetry, curving glazed entrance lobby, mezzanine and projecting fireplace. As with the tidewaiters, its unique interior character is illustrative of the specificity of use within the building and is remarkably in-tact, appearing as an anteroom to the main administrative space within the Long Room. The proposals within this space are minimal, and limited to the adaptation to the interior of the existing cabinetry to conceal a vertical riser and the removal of a single leaf door opening to the west. The works here are considered to retain the contribution of this space to the significance of the building, with an overall neutral impact.

Café / Engagement Room & Galleries

191. The proposals include the conversion of a sequence of rooms to the southern side of the ground floor for use as a café and gallery space. This area was adapted through Smirke's rebuilding works, blocking off what was a secondary circulation route, south of the main corridor which would have led to Laing's grand staircase. These works and the resultant plan form however remains of interest, with the grand fire places, vaulted ceilings and colonnaded ante-room creating a sequence of interest. A noted exception is room RWG15, presently in the location of Laing's Great Stair which has been entirely converted into a series of server rooms with the covering over of all decorative features of interest and insertion of suspended ceilings and ducting. The proposals seek to reinstate the Laing era through route to what was the lobby to his Grand Stair, reusing the existing historic partition and door and creating new double leaf openings along the secondary corridor to reach the café and proposed gallery space. Room RWG15 will be stripped back, removing later plant work and finishes to reveal the historic brick work, creating some heritage benefits. The final fit out and servicing to the café will be controlled via condition to ensure all features of interest including fireplaces, plaster work moulding and vaulted ceilings are retained. While these works will result in the loss of Smirke era partitions with a low level of harm arising, the provision of a step free route into the building interior is considered to maximise the public entry into and appreciation of how these smaller sequences of rooms relate to the more formal spaces of the Kings Warehouse. These works are also necessary to deliver a publicly accessible café to the waterfront, encouraging a more welcoming frontage to the river and retaining a degree of public permeation through these spaces. The overall level of intervention is considered to be minimal, overwhelmingly retaining the volume and hierarchy of the spaces and overall plan form character. These works are therefore considered to be acceptable.

Basement

192. At basement the approach has been adapted according to each Wing, reflecting the relative sensitivity of each area of the building. In the west wing the proposals seek to convert the southern rooms in this area into a spa for use by the hotel guests and accessible via the western elevation by the public. The northern rooms are proposed to provide WCs, plant and staff amenity space, with a new rainwater tank proposed underneath the central courtyard. The approach has been to strip back the excessive plant runs to restore and reveal the historic brick vaults and fully connect the corridor which runs the majority of the wing perimeter, with some benefits arising from the revealing of the historic brick work.

193. The following assessment uses room numbers taken from the gazetteer as appropriate. Where opening up of partitions are proposed these are in general where later twentieth century lightweight partitions/ modern WCs or secondary doors and circulation spaces have been added, obscuring the regular volumes of the rooms. Later strengthening works such as concrete lintels and modern brick infill have also been sporadically added at this level, following the use of

some of the basement rooms as an air-raid shelter, with some rooms also full refurbished with suspended ceilings and modern carpeting. The removal of these features are considered to be of benefit, noting some historic interest in the air-raid use of the building. The later flood wall and adjacent slab are also proposed to be removed to make way for the new flood prevention works. This fabric dates to the twentieth century and its removal is accepted.

194. In general the removal of these later features and creation of greater consistency of material palette are considered to be of benefit, however there are isolated instances where small areas of Laing and Smirk era fabric will be removed. This includes the historic stairs and slab within the central west wing courtyard, the nibs either side of a fireplace (Room CWB01), a pier across the main corridor to the north west (Room CWB10), a series of nibs and sections of partitions in Room CWB05, isolated door reveals and the western pier to the WCs in Room CWB06, as well as the slab in this area. The latter is to facilitate the installation of the new circulation cores, noting the brick work to the western pier is proposed to be retained and re-used. Some harm arises through the loss of this historic fabric, with additional harm arising in areas where new subdivision is proposed. However it is considered the approach has minimised this loss, noting that overall the proposed plan from retains the historic volumes, preserving the chief ways in which this area contributes to significance.

195. Importantly the proposals seek to preserve the cast iron structure associated with Laing and Smirke where still in evidence. A condition has been added to control the fit-out of these spaces ensuring views to historic vaults, brick work and features of interest noted in the gazetteer, aside from where expressly indicated in the proposed drawings, are retained and the use of inappropriate waterproofing works and tanking to the slab is avoided.

196. To deliver services a new central 2m trench is proposed within the main corridor, carefully removing and reinstating the existing stone flags, to preserve the character of the floor as existing. The methodology for these works, including the excavation and structural support of historic fabric will be controlled via condition, to include the insertion of a reinforced concrete box around the trench perimeter, terminating above the level of existing Smirke era underpinning beams. In places the width of the trench will require the below ground structural brick corbels to be minimally cut back. While some harm arises through these works, the consolidating approach taken is considered to have minimised the need for excessive ductwork and risers through the building, removing the excessive plant runs found in the basement at present. This harm is therefore considered to be minimised, and the approach found acceptable.

197. Within the central wing, areas of significance comprise the large vaulted central space, partially excavated to provide a riot training trench, with cast iron shallow jack arches and cast iron columns, as well as the brick vaults to the north and

west. The proposals within this wing principally comprise the removal of later partitioning and finishes associated with the late twentieth century office use of the building and the expansion of the existing trench to deliver a new swimming pool and gym. Historic fabric associated with Laing and Smirk, including cast iron columns are preserved in situ, with the exception of the slab to be excavated to expand the pool and some secondary brick partitions to RCB.24 and RCB.19-21. While partitions in this area are to be altered, it will retain symmetrical room volumes responding to the ceiling vaults. While some harm arises through the loss of historic fabric, this is considered to be minimised and required to deliver the lift core and stair to ground. The servicing to the swimming pool is proposed to be undertaken via air in-takes through the lightwell to the south and through existing window openings to the rear of the proposed new terrace at the quayside. All extracts are to be via adapted chimneys to allow risers to reach roof level. The pool servicing will be subject to a specific condition to ensure the quality of air and noise to the quayside will be preserved, with all extract and intake openings discreetly located out of sight. The fit-out of the proposed gym, sauna, offices, WCs and changing rooms respect the proportions created by the column lines, ensuring regular divisions to the volumes within this wing and is considered acceptable and in keeping with the relative contribution of this space. As above the fit out of each space will be conditioned to preserve features of interest.

198. Within the east wing the later fabric is in general much less sensitive to alteration, with an existing service ramp creating access from the quayside. This feature removes the original axis into the east wing from the river front and removed the Smirke era steps, creating a utilitarian character in the principle approach to the water front from the east. The proposals seek to build over the existing ramp, extending the open area of the quayside by 140m2, reinstating the Smirke steps over the resulting lightwell behind the new flood wall. Vehicle access into the basement will be via a vehicle lift designed to sit to the east of the colonnade to the east wing façade, behind the flood wall. The majority of the building's plant as well as the catering store, goods lift and cycle store is located within the east wing basement, while retaining what remains of the Smirke era piers to the perimeter. The proposals here are considered to have an overall low beneficial impact through the reduction in the existing basement ramp, dramatically improving the open character of the quayside, with considerable heritage benefits arising.

Quayside, landscaping and Public Realm.

199. At the heart of the proposals is the improvement to the public realm and quayside, improving public access to the riverfront and in turn amplifying an appreciation of the important historical function between the building and river, going to the heart of the building's significance. More broadly the works will improve a significant stretch of river front, connecting the site into wider public routes along the north bank. While at present there is a path to the river front, the considerable height of the twentieth century railings creates a significant

visual barrier which is off putting to the passerby. The path and quayside also frequently flood, preventing safe use of the path a number of times a year. North of the railings the poor-quality hardstanding, carpark and ramp obscures the importance of this area in relation to the historic use of the building, whilst also detracting from the architectural character and undermining the grandeur of the building's principal façade. While the grade II* listed river wall is an important feature of the quayside, the cramped dimensions of the public route from the west means an appreciation of the wall as part of the riverfront is diminished, also impacting the degree to which it is appreciated as a group with Custom House.

200. The proposals seek to reintegrate the quayside with the waterfront and Custom House, improving routes through, restoring a more sympathetic material palette and providing activation and historic interpretation. However, an important constraint to the proposals is the continued use of the quayside as a flood plain, restricting the loss of open ground and limiting appropriate planting and built interventions to those that are flood resistant.

Old Billingsgate Lane

201. The proposals comprise the removal of the existing asphalt hard standing to the quayside and replacement with granite paviers, re-siting the existing small number of historic granite setts to the passage to Old Billingsgate. Further works along Old Billingsgate include the provision of planting beds and climbing plants along the old boundary wall, creating a welcoming greened entrance into the site and improving what currently appears as a backland alley. The gates to the northern end of Old Billinggate will remain, but be fixed open 24/7, encouraging pedestrian access to the waterfront. The southern end of the boundary wall along the lane will be lowered slightly from 2.35 to 1.35m. While this will remove a small amount of brick work, the improved sight lines into the site encourage a sense of civic ownership over the quayside and is considered of benefit to the creation of a more open character more in keeping with the historic use of the riverfront. This material change is of significant benefit to the overall character of the quayside, improving the degree to which this area is appreciated as part of a wider historic composition and remedying the backland character to the quay.

202. The existing deteriorating wooden ramp from Old Billingsgate onto the quayside is to be removed and realigned north-south, with an additional flight of steps created, enabling step free access to the full extent of the quayside and new terrace. This intervention will dramatically improve the civic quality of this space, effectively widening the publicly accessible land and allowing improved level access during flooding events. When taken together alongside the removal of the carpark railings, this achieves a generous sense of scale to the riverfront.

203. To protect the uses within the basement, the integrated flood wall extends north along Old Billingsgate's Walk across the western entrance into the west wing. While this will partially obscure views towards the western elevation, with a low level of less than substantial harm arising to Custom House, the added protection from flooding is considered of long term benefit, with the overall height of the wall minimised to withstand predicted 2100 flood levels, and is on balance considered acceptable.

Quayside

204. This offer is enhanced through the provision of new seating, with benches to the waterfront and along the southern frontage of the building, as well as through the integrated seating as part of the steps. The proposed benches are simply designed using timber, drawing on the industrial heritage of the riverfront. These benches will provide an array of seating options including back and arm rests or individual seating, also ensuring sufficient navigation space around trees to not impede passersby or those with mobility aids and allowing space for wheelchair transfer. These alterations are considered to improve permeability and encourage dwell times in this important open space, delivering an important area of public realm on the water front which is of considerable public benefit. The installation of a public fountain and drinking bow for pets also enhances the civic character of the space. Additionally a new element of historic interpretation is proposed, using a small metal band will be set into the single format granite paviours, engraved with the names of historic wharfs along the riverfront. This intervention is considered to successfully enhance an appreciation of the evolution of the river front and provide moments of interest and enjoyment. A condition has been added to ensure the appropriate profiles, fixings and materials are used to ensure no impediments to equitable access.

205. The regular flooding of the water front limits the use of the quayside for events. When in use for events (within the activation areas only) these will be unticketed and free to access and without any barriers of any kind, retaining the full public access to the waterfront at all times of the day and year. Any servicing for any events along the quayside will be from behind the flood wall, with the activations such as additional tables and chairs limited to locations where the quayside is widest, opposite the east and west wings.

206. The works retain the existing plane trees, ensuring a pleasant verdant quality is retained to the river front and in longer range views from the south. Specific protections for these trees are secured via condition, ensuring no negative impact during construction and operational phases. Further greening of the quayside is proposed with the provision of planting beds along the western and eastern wings southern frontage. The planting proposed has been designed to withstand the regular flooding and is appropriate to this water front location, to be secured via condition. The planting beds along the quayside have also been designed with an underlaid perforated drain to discharge via the trains. These

works require 100m diameter openings within the river wall, fitted with a non-return tidal flap. These works will require the limited loss of historic fabric within the wall with a low level of harm arising. A condition has been added to ensure appropriate methodologies and materials are used to undertake these works. In total the works to the quayside, encouraging access to and use of the proposed café and gallery space will stimulate activity throughout the day and week, appealing to a broad and diverse audience.

Water Lane

207. The footpath to Water Lane has been broadened and extended, encouraging pedestrian traffic from the north and east along this route to the waterfront. These works will use yorkstone paviours to signal the extent of the public footpath, transitioning to granite paviours where the river frontage is reached, and mediating the fall of the land appropriately. Additional blue badge parking bays are to be provided along the lane. Further improvements to the public realm along this route include the upgrading of the circular pits to existing trees with improved permeable surface. The existing CoL bollards to the southern termination of the lane are to be extended to prevent vehicle access onto the riverfront, ensuring a pedestrian focused space is achieved, noting no cycle access is allowed along the River Path.

Lower Thames Street

208. The works to the waterfront are complimented by the public route north south through the building from Lower Thames Street, with a new drop-off point at Lower Thames Street. Along this street, the pavement is to be relaid to enable level access into the building, with granite paving to the layby and yorkstone to the pavements. The change in gradient is navigated through the provision of a double kerb to the layby, transitioning to a single kerb to maximise the accessible use of the space. Further improvements to Lower Thames Street include the addition of planters to replace the existing railing either side of the main entrance, creating a green edge along Lower Thames Street. The height and depth of the planters are to be controlled via condition to ensure adequate ventilation is achieved and through views to the historic façade is retained.

Lighting

209. The proposals include the restoration and re-siting of the historic street lamps and lanterns to Lower Thames Street and Quayside, re-integrating them into the new proposals. The overarching lighting scheme has been sensitively designed to enhance enjoyment of the historic fabric with additional key linear lighting integrated into the quayside particularly where change of levels are navigated, aiding wayfinding and sense of safety across the site. All of the exterior lighting is to be controlled via condition to ensure appropriate light

levels including tone, brightness and fixtures are used in accordance with the City of London Lighting SPD.

Cycle Parking

210. Short stay cycle parking is provided along Old Billingsgate Lane as well as Water Lane, comprising 15 cycle stands in each location, with widened spacing to accommodate accessible cycles. 60 cycle spaces in total are provided. The cycle stands have been sensitively sited to away from the river front and the historic facades. The total height of the stands fall below the cill height of the windows. Full assessment of cycle provision is provided in the transport assessment

Summary of works to the Quayside and Public Realm

211. In total the public realm and landscaping works are considered to be of important benefit to the setting of Custom House, through the restoration of a generous open space along the riverfront, recreation of a sympathetic material palette and delivery of subtle but impactful historic interpretation. The benefits derived from these works are amplified given both the visual, historic and architectural importance of the relationship between Custom House and the river, which is hard to overstate.

212. The works will rehabilitate what currently appears as a backland space divorced from the riverfront and building interior, to a primary circulation area intimately connected with the function of the building. The materiality of the public realm, proposed planting and all associated furniture is considered to be acceptable, it is in accordance with Local Plan (2015) Policies DM10.1, DM10.4, London Plan (2021) Policies D3, D4 and D8.

213. The works are considered to enhance an understanding of how the principal spaces within the Custom House, such as the Long Room and Kings Warehouse operated in direct relation to traffic from the river. While the new flood wall and vehicle lift will create a visual barrier to the lower levels of the building, the overwhelming effect of the works is a revealing of the southern façade in views from the river path as well as from Old Billingsgate Market, Sugar Quay as well as in more distant views from the bridges and south bank. More generally the considerable improvements to the accessibility of the river front and surrounding lanes, with the improvement to level access during flood events and provision of water fountains, benches and planting make the quayside an enriched civic space, encouraging foot traffic and activity which better reflects the historic use of the building as an important transport and administrative node. Relatedly, the works are also considered to improve the visual relationship between the listed river wall and Custom House, so that the historic functional interest of these structures is more readily apparent, improving their overall group value. Full details of the landscape designs,

including planting specification, and strategies for furniture, pergola design, lighting and hard surfaces, will be conditioned to ensure the designs are of a high quality and resilient in this context.

214. As such the proposals are considered to dramatically improve the contribution that the most important part of its setting makes to an appreciation of Custom House's significance, whilst delivering an important piece of public realm in accordance with policy.

Impact to Custom House

215. The proposals have been found to create a range of impacts to Custom House ranging from moderate and low adverse levels of less than substantial harm, as well as some beneficial impacts. The majority of harmful impacts are directly related to the conversion of the building to hotel use and the installation of necessary amenities to deliver this use, such as guest bathrooms, plant, services and circulation. While in relation to each room the loss of historic plan form and fabric is small, cumulatively they considerably diminish the in-tact quality of the building, and create a more domestic rather than administrative character, lessening the degree to which the historic use of the building is legible. The level of harm also is intensified given the particular contribution its historic use makes to its significance and interest as the centre of wealth production for Georgian London and the city in particular. However in each case the harm identified is considered to be less than substantial in the language of the NPPF.

216. These instances of harm are considered to have been minimised and justified throughout the pre-application process. Importantly the works also preserve and in some cases enhance the more sensitive interior spaces such as the Kings Warehouse, Long Room, Tidewaiters Room and Robing Room through the stripping back of later unsympathetic additions and restoration of Laing and Smirke era details and circulation, creating considerable heritage benefits.

217. The importance of the improvements within the building's setting, substantially enhancing the degree to which setting contributes to significance is considerable and hard to overstate. The re-establishment of historic openings onto the quayside, the removal of the basement ramp and hardstanding, the recreation of a more sympathetic material palette and more generous open quality to the river front, all create direct improvements to how the historic function of Custom House alongside the river is perceived. Relatedly these works also create an amplification of group value with the separately listed river wall, crane and steps. All of these impacts, both positive and negative are afforded great weight by officers, with the less than substantial levels of harm arising balanced against the public benefits of the scheme in in the balancing exercise in a later section of this report, below, including consideration of those heritage benefits noted above.

Impact to River Wall, Cranes and steps Custom House Quay

218. 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 re-siting 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 at paragraph later in this report.

Other Heritage Assets

219. The following heritage assets outside the site boundary are considered to be potentially affected by the proposals, through indirect impacts via setting.

- The Monument, (Grade I, Scheduled Ancient Monument)
- Old Billingsgate Market (Grade II)
- St Dunstan in the East (Grade I)
- Walls, Gates and Railings to St Dunstans in the East Churchyard (Grade II)

The Monument (Grade I, Scheduled Ancient Monument).

Significance

220. The Monument to the Great Fire (“the Monument”), by seminal architect Sir Christopher Wren and Robert Hooke, built 1671-77, symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted Roman Doric column of Portland Stone with a crowning gilded flaming urn sat atop a large pedestal containing inscriptions and base relief representative of the sociopolitical context in which it was built. The monument is also an early example of a purpose built public viewing gallery and visitor attraction, the scale and design of which was intended to be dominant over its surroundings and command a London-wide presence. It is of exceptional architectural, artistic, historic and archaeological significance as a City and London-wide landmark, it also holds notable group value with other Wren designs across the City.

Setting

221. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance. It was symbolically sited near the site on Pudding Lane where the Fire began and on near axial alignment with the Old London Bridge, the site of the original Roman bridge from which London originated. It once, alongside the rebuilt City church towers/spires, was pre-eminent in the much artistically represented London skyline as part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival experience from London Bridge of the gravitas and grandeur of a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.

222. The site falls within key views from the Monument (View One as described in CS13 and The Monument Views Study) indicated in View 6 within the HTVIA. In these views the west wing of Custom House is visible in the foreground seen adjacent to the river and Tower Bridge. Custom House therefore makes positive contribution to the wider setting of the Monument, seen as part of a tableaux of historic buildings along the river front, forming part of a wider sequence of structures from the Monument to the river. The quality of these views are however oblique, so that a full appreciation of the principle elevations of Custom House is not possible, but the historic Georgian character and grand scale is nevertheless appreciable on the approach between the two. The site is also appreciable together with the Monument in views across the Thames and from Tower Bridge (LVMF 10.A, HTVIA views 1 and 2). Here Custom House provides the immediate foreground to views of the Monument, again contributing to the sense of a historic monument within a evolving but ancient townscape with phases of development from the Georgian and Victorian eras.

Impact

223. The proposals are just about discernible from the Monument, in the high level works to the western courtyard. These works preserve the degree to which the building is appreciated as a Georgian structure of scale on the riverfront as seen in these views, and as such conserve the positive contribution that custom house makes to the monument's setting. Similarly while changes to the roofline is proposed, the works are considered to preserve the positive historic quality to riverside views towards the monument such as from Tower Bridge. The overall impact upon the significance of the Monument is therefore considered to be neutral.

St Dunstan in the East (Grade I) and Walls, Gates and Railings to Churchyard (Grade II)

Significance

224. The listed building includes a tower and steeple by Wren, constructed between 1695-1721 and the ruins, following bomb damage, of a later church, built between 1817 to 1821, based on designs by David Lang. In 1967–71, the ruins

of the church were transformed into a garden, incorporating the restored Wren tower. The surrounding environment of the church has changed over time, with the churchyard now playing a significant role in the appreciation and understanding of the church, making a very positive contribution to its significance.

225. The church's steeple is a material record of work in reconstructing city churches following the Great Fire. Views of the steeple of St Dunstan in the East, including from the riverside, as well as views shared with other Wren churches— St Margaret Pattens, and St Mary-at-Hill, including from the Monument Gallery—also contribute to the church's understanding and significance. The building has high historic and architectural interest as a ruinous early 19th century church, featuring a post-Fire steeple and tower designed by Wren.

Setting

226. The ruins of the Church of St Dunstan in the East lie within their associated garden but otherwise within a more modern setting informed by commercial buildings mostly dating from the 20th century onwards. There are clear views along aligned routes towards the rebuilt tower from the south at Lower Thames Street, from the east along Cross Lane, and from the north along Idol Lane. This modern setting of larger floorplate commercial buildings, particularly to the south and west do not contribute to the ability to appreciate and understand the heritage significance of the Church ruins. Custom House is partially glimpsed through the railings looking south. While the views do not allow for full views of the facades they provide a positive historic backdrop in the immediate locality, and underline the position of the river and enhance the sense of a partially lost historic streetscape. The overall contribution of the site is therefore positive.

Impact

227. The proposals are visible in views south from the church and church yard, with small changes to the windows, roofline and railings discernible. These works will preserve the overall historic Georgian character within the site, with an overall neutral impact upon the setting of the church and churchyard, preserving the current contribution of setting to significance.

Billingsgate Market (Grade I)

Significance

228. Billingsgate Market was Grade II listed in April 1980. It was built between 1872-1873 by Horace Jones, constructed in London Stock brick with Portland stone dressings in a Neo-Classical style. The historic and architectural interest of the building is closely related to its importance as the largest market of its kind during the nineteenth century as well as its impressive span and engineering, with the general market comprised an area of about 30,000 square feet, covered with louvre glass rooves and a 30 feet wide gallery was allocated to the sale of dried fish, while the basement served as a market for shellfish. The

buildings is illustrative of London's importance as a centre of industry and trade, with the iconic riverside location and grand architectural treatment indicative of the celebratory approach to industrial structures during the Victorian period.

Setting

229. The building enjoys a prominent position on the northern bank of the River Thames, crucial to its function as a fish trading market and celebrated through its decorative grand southern façade, making a very high contribution to significance. Custom House is located directly to the east, at together the buildings create a historic group of monumental structures associated with trade spanning the Georgian and Victorian periods, reinforcing the significance of each. The contribution of Custom House is somewhat undermined by the present quality of the quayside immediately adjoining, appearing as a private inaccessible car-park rather than a functional piece of historic riverside infrastructure.

Impact

230. The proposals are considered to improve the contribution of setting to the market, rehabilitating an important stretch of riverfront and reinforcing a more open inter-connected quality to the quayside. The removal of the car-park and hardstanding creates a more sympathetic material palette in the wider surroundings. Just as the improvements to the quayside reinforce the historic function and significance of Custom House this in turn improves the group value of the site and contribution to the market. Views within the HTVIA (Views from old Billingsgate also demonstrate the preservation of those positive qualities of the site, in reference to its Greek Revival façade).

<u>Scoping Exercise</u>

231. A number of additional assets are located within the wider surroundings however these have been scope out of assessment due to the limited external scale of the proposals, distance from the site, oblique character of intervisibility and/or intervening development. This is a proportional exercise in accordance with paragraph 207 of the NPPF and is consistent with the applicant's scoping exercise. As such the following assets are scoped out of assessment:

Tower of London World Heritage Site and all related listed buildings, Eastcheap Conservation Area, Trinity Square Conservation Area, The Tower Conservation Area, Tooley Street Conservation Area, Church of St Mary At Hill, Grade I, Church of All Hallows by the Tower Grade I, Church of St Margaret Pattens Grade I, Church of St Magnus The Martyr, Grade I, Watermens Hall Grade II*, 33 and 35, Eastcheap Grade II*, 60 and 61, Mark Lane Grade II*, 7 and 8, Philpot Lane Grade II*, Gateway with Adjoining Wall and Railing to Yard of Church of St Olave Grade II*, St Olaf House Grade II*, St Mary at Hill Grade II, 9, Idol Lane Grade II.

232. Officers considered that there would be no potential for the proposals to impact on their significance; the settings and the contribution they make to the significance of these designated assets, would not be adversely affected and/or any impact would not be over and above those impacts already identified. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these designated heritage assets. The assets assessed in detail in preceding sections are considered sufficient to understanding the impact on significance overall.

Conclusion Design, Heritage and Public Realm

233. The proposals have been fundamentally shaped by the significance of Custom House as a key site of exchange, rare Georgian survival and palatial neo-classical structure in a prominent riverside location. An assessment of the proposals has identified several instances of less than substantial harm to Custom House through the conversion to hotel, for example to its interiors where the creation of bathrooms, risers and adequate circulation to deliver the hotel use diminishes the overall intact quality of the interiors, there are additional works both internally and externally that would be harmful, as outlined above. However in every instance these are considered to be less than substantial, and have been minimised and justified.

234. Importantly the scheme also officers a range of heritage benefits, including the restoration of historic circulation and details within the principle spaces, removal of later twentieth century partitions and duct work as well as most critically, the dramatic improvement to the quayside, restoring an open character, sympathetic palette of materials and expanding the publicly accessible space on this important piece of river frontage. These works are thought to substantially improve the contribution of setting to the significance of both Custom House and the listed steps, cranes and quayside, improving the group value of both. Both the harm and heritage benefits are given great importance and weight within the overall planning balance for the scheme, undertaken at in later sections of this report. It is important to note the benefits of the proposals also include those which relate to the accessibility and more general public realm. These include the significant improvements to degree of step-free permeability across the site which at present is very limited, particularly during flood events. The proposals will also create a new accessible riverside café and engaging high quality public space, connecting this large stretch of river frontage to important north bank route between Old Bilingsgate Market and the Tower of London. As part of the proposals, public access to the interior spaces have been secured including the use of the Long Room, food and beverage offers in the Kings Warehouse as well as a series of bookable engagement and gallery spaces. As such the proposals are considered to deliver on key policies around the activation and improvement along the river front and celebration of the City's heritage. The proposal would be transformative through the delivery of the quayside that would have unfettered public access, 24 hours a day, 7

days a week, 365 days a year, transforming a currently underutilised site with little active ground floor uses and no publicly accessible public realm.

235. The design, architecture and public realm proposals therefore comply with Local Plan Policies: CS10, DM10.1, DM10.8, DM10.4, DM16.2, DM19.1, CS19 and Emerging 2040 City Plan Policies: S8, S10, AT1, DE1, DE2, DE3, DE8, and London Plan 2021 Policies D3, D4, D5, D8, T2, and HC3. This is in addition to the relevant sections of the National Planning Policy Framework, the National Design Code, the Public London Charter LPG, the City of London Public Realm SPD and City's Public Realm Toolkit.

.

236. Specifically with regard to heritage policy, a low and moderate level of less than substantial harm to the significance of Custom House as well as an array of heritage benefits to the significance of Custom House and the listed river wall, cranes, steps and quayside have been identified. In addition, the significance and contribution of setting of a broad range of other designated heritage assets would be preserved. The benefits and harms will be considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the end of this report. Overall, in view of the heritage harm identified the proposal would draw conflict with Local Plan Policies CS12 (1), DM 12.1 and 12.3, draft City Plan 2040 policies S11 and HE1, and London Plan HC1. Special regard is paid to the desirability of preserving the listed buildings, their settings or any features of special architectural or historic interest which they possesses, under the duty set out in Section 16 and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF 2025 policies.

Strategic Views

237. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. It seeks to implement the Mayor's LVMF SPG, protect and enhance views of historic City Landmarks and Skyline Features and secure and appropriate setting and backdrop to the Tower of London. Policy S23 of the emerging City Plan 2040 seeks the same and takes into account the Tower of London World Heritage Site Management Plan (2016)

LVMF No.10A - River Prospect: Tower Bridge

238. The LVMF SPG recognises this as a fine, broad river prospect, its character derived from its significant depth and width. It is the only designated River Prospect in which there are two Strategically Important Landmarks (SILs), St Paul's and the Tower of London (ToL). It allows the ToL to be read as a significant part of the rich tapestry of London, where there is an acknowledged prominent relationship with the backdrop of tall buildings in the CoL (para 182). The SPG states the middle ground includes the varied elements of the City,

rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as spires of City churches and the Monument. Other prominent buildings or structures in the background include the Canon Street Station towers, BT Tower, Centre Point and Tate Modern, which all combine to draw and hold the attention of the observer. The visual management guidance further states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186). At present Custom House is seen on the riverfront in the middleground providing a foreground to the Monument which rises directly behind it, forming a pleasing historic tableaux.

239. The effect of the proposal on this view are minimal and only just discernible, through the slight change in roofline. The observer's ability to recognise and appreciate the relevant Strategically Important Landmarks – the ToL and St Paul's Cathedral – in accordance with London Plan Policies HC4, Local Plan policy CS13 and emerging City Plan 2040 Policy S13 is therefore conserved. It would not obscure an appreciation of the scale and geography of London, including the Monument, in accordance with the visual management guidance in the LVMF SPG.

LVMF 25A.1-3 – Townscape View, Queen's Walk

240. The focus of the view is the ToL (HTVIA View 2), focused on axis with the White Tower, which also benefits from a dynamically protected sky-backed silhouette between the Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (para 413). The visual guidance acknowledges the long-established presence of the consolidating City Cluster in the view which, alongside those historic landmarks, reflect over 900 years of London's development (para 410). The juxtaposition of the modern city with built elements from a variety of eras is deemed a central characteristic of the view (para 411/413), and its rich variety of landmarks including City Cluster towers such as the Gherkin and Tower 42. At present Custom House is seen prominently in the foreground, seen as a group of historic buildings on the river front.

241. The proposals are considered to preserve the existing character of this view, with the overall changes only minimally perceptible. In accordance with the relevant LVMF visual management guidance the proposal would not affect the fore/middle grounds of the views, or the close relationship with the River Thames and principal setting of this iconic view (SPG paras 416-417). Overall, the proposal would preserve and enhance the characteristics and composition of the view as a whole, preserving the characteristics and composition of the landmark elements, and a recognition and appreciation of the Strategically Important Landmark. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would allow the observer to see specific buildings in conjunction with their surrounding environment. Thus it is

in accordance with London Plan Policy HC4 and associated visual guidance in the LVMF SPG.

LVMF 11B.1-2 – River Prospect, London Bridge (Downstream)

242. The ToL World Heritage Site is identified as the sole Strategically Important Landmark, whilst Tower Bridge and HMS Belfast are identified as other landmarks. Custom House features prominently in the foreground of these views, seen as part of a sequence of historic buildings to the riverfront, seen together with Old Billingsgate Market to the west, and the Tower of London and Tower Bridge to the east (HTVIA Views 4 and 5)

243. Due to the distance of the viewpoints and scale of the proposals, the works are only just perceptible. The overall historic character of the site and group value with the adjoining buildings will be preserved. The proposal would not affect the clear sky backdrop of the White Tower, and would not impose itself on it, preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower. It would not be harmful to the view, setting or significance. Overall, the proposal would preserve the characteristics and composition of the view as a whole, preserving the characteristics and composition of the landmark elements, and a recognition and appreciation of the Strategically Important Landmark. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would allow the observer to see specific buildings in conjunction with their surrounding environment. It is in accordance with 66 London Plan Policy HC4 and associated visual guidance in the LVMF SPG.

Summary of LVMF Impacts

244. The proposal would not harm, the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the Strategically Important Landmarks, in accordance with London Plan Policy HC4.

City of London Strategic Views

Monument Views

245. In support of Local Plan policy CS13, the Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposals have been designed, in terms of siting, height and appearance, to preserve views of and from the Monument.

Views from the Monument

246. The site falls within View One from the Monument as described in the SPD. Currently this view extends from the spires and towers of the churches of All Hallows by the Tower (Listed Grade I) and St Dunstan in the East (Listed Grade I) through to the bow of the warship HMS Belfast moored beside the south bank of the River Thames. The spires and towers of All Hallows by the Tower and St

Dunstan in the East are recognisable as part of the Eastcheap Conservation Area and the eastern part of the view focuses upon the Tower of London where parts of the curtain wall (from Legge's Mount to Brass Mount) are visible. The northern river bank is indicated by the line of trees and railings in front of the Custom House (Listed Grade I) which leads the eye towards Tower Bridge. The site is seen, partially visible beyond the junction of Lower Thames Street and Monument Street together with Billingsgate Market (Listed Grade II) forming a historic tableaux in the foreground.

247. The proposals will be visible within this view, however due to their minor scale and the obliqueness of the viewpoint, the proposals are considered not to obstruct or detract from the general prospect by inappropriate bulk or massing. Height and massing of the proposals does not visually intrude into the key features of the views as described and views of the River Thames are maintained. The view is therefore considered to be preserved in accordance with the SPD.

Views of the Monument

248. As noted above, the site is visible forming an immediate foreground to the monument in views from Queens Walk and Tower Bridge (HTVIA views 1 and 2). In both the proposals are found to not dominate of detract from the setting of the Monument. Preserving its landmark status is the surrounding city views.

Conclusion on Monument views

249. The proposal would preserve all views of and from the Monument identified within the Protected Views SPD and would thereby accord with Local Plan policy CS13 and emerging City Plan S13 and associated guidance in the Protected Views SPD.

250. Paragraph 4.14 of the Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument. The principal axial views are identified as being provided by King William Street and Gracechurch Street/Bishopsgate as leading the eye into the Bank Conservation Area and the fringe of the City Cluster.

Conclusion on Strategic Views

251. The proposal would preserve the characteristics and compositions of all relevant LVMF and other strategic pan-London views. It would preserve strategic views of and from the Monument. As such the proposals would preserve all relevant strategic views in accordance with Local Plan policy CS13, emerging City Plan Policy S13, London Plan Policies HC2, HC3 and HC4, GLA LVMF SPG, City of London Protected Views SPD and neighbouring local view policies and guidance.

Quayside

252. The application site is situated within the Thames Policy Area in both the Local Plan and the emerging City Plan 2040, as such policies CS9 and S17 are of relevance respectively. In addition, in the emerging City Plan 2040, the application site is situated within the Pool of London Key Area of Change and as such policy S19 of the emerging City Plan 2040 is also of relevance. It is noted that this section of the report only discusses the parts of this policy that are relevant to Public Realm and Quayside, with the other parts of these policies being discussed in the relevant sections of this report.

253. Part 2 of policy CS9 requires:

(i) Protecting public access and river views along the riverside walk and securing completion of the riverside walk at Queenhithe
(ii) Improving access to the river and riverside walk from the rest of the City and the Thames Bridges

254. Part 1 of policy S17 requires:

(a) Protecting and enhancing permanent public access and river views along the Riverside Walk
(b) Improving Access to the River Thames by enhancing north-south routes and widening of the Riverside Walk
(c) Maximising opportunities for public open space along the riverfront and seeking public realm improvements and increase permeability to the north of the Riverside Walk
(d) Improving the vibrancy of the riverside by requiring new development to provide active frontage where appropriate.

255. Policy S19 sets out that the Pool of London Key Area of Change will be renewed through the refurbishment and redevelopment of building stock and delivery of significant public realm improvements by:

(1) Making the area's buildings, streets and public spaces more inclusive, accessible, welcoming and vibrant, with a mix of uses that encourages more activity and greater enjoyment of the River Thames, public spaces and Riverside Walk for all.
(3) Requiring increased vibrancy and active frontages at ground floor, rooftop and terrace levels, through the provision of retail, publicly accessible cultural uses on the river frontage.
(4) Encouraging the provision of recreation, cultural events, arts and play in public spaces along the riverside, and ensuring their delivery through Culture and Vibrancy Plans.
(5) Maximising opportunities to increase the quantity and quality of public open space along the riverfront and seeking public realm improvements and increased permeability to the north of the Riverside Walk

(6) Optimising the use of historic assets and spaces around them in ways to better reveal their heritage, create inclusive and welcoming environments and help to make the river front more vibrant and accessible for all

256. The application site is situated within the Thames Strategy Area and therefore the City of London Thames Strategy (2015) SPD is of relevance. The London Bridge to Water Lane section of the strategy encompasses the site and sets out that Custom House and its associated river wall, stairs and cranes are important heritage assets in the area. It is stated that better use of the riverward spaces adjacent to buildings would be welcomed and goes onto state that car parking and vehicular access for servicing dominates several of the private spaces on this stretch of the riverside and that greater public access and more inclusive use of these spaces would be expected to complement any redevelopment.

257. The Riverside Walk Enhancement Strategy (2015) SPD seeks to address challenges specific to the riverside walk. It states that where re-development occurs, the unique riverside location offers opportunities for creating new public spaces, together with widened and direct sections of Riverside Walk. Custom House (at paragraph 8.3.2.9) is identified as an area for significant public realm improvements and widening of the current path.

258. Policy CS19 of the Local Plan seeks to secure additional publicly accessible open space and pedestrian routes where possible and securing public access where possible, to existing private spaces. Policy DM19.1 states that major commercial development should provide new enhanced open space where possible and amongst other things goes onto state that new open space should be publicly accessible. Policy S14 of the emerging City Plan 2040 states that the provision of new open space should be sought through development and public access to new open spaces should be increased. Policy OS1 states that additional publicly accessible open space and pedestrian routes will be sought in major developments, particularly in and near to areas of open space deficiency, in area such as the riverside where it is a key component of placemaking, that open spaces should be free, accessible, welcoming and inclusive.

259. The Mayor London's Public London Chater (2021) sets out principles for the management of new public space.

260. As set out above, polices with the current Local Plan and emerging City Plan 2040 seek the creation of newly created public spaces and seek improved access to the river and riverside walk.

261. In the current situation, a car parking area is situated between the southern elevation of Custom House and the Thames path. There are railings between the car park and the Thames path. As part of the development, it is proposed that the railings would be removed, and car park would be replaced by a publicly

accessible quayside that would interconnect with the existing Thames Path. This part of the Thames Path will be secured as City Walkway as part of this application given officers have not been able to establish that it has previously been declared. The quayside would have an area of 2239.6sqm (this area does not include the proposed terraces or Old Billingsgate Walk). The quayside would be able to be accessed via Old Billingsgate Walk and from Water Lane, and also from east and west along the Thames Path. By removing the railings, in essence a continuous public space is created which would blend the Thames Path and the quayside. The submission sets out that unfettered public access would be provided to the quayside, 24 hours a day, 7 days a week, 365 days a year; this would be secured within the S106 agreement to ensure that unfettered access is provided to ensure that the quayside truly is new publicly accessible open space; for the avoidance of doubt, access cannot be restricted via ticketing, barriers, private events or corrals etc. . As part of the management plan for the public realm secured within the S106, it would need to demonstrate how the quayside would be managed in accordance with the Public London Charter. It is noted that if public access was frequently restricted in the way that was proposed in respect of the previous 2020 application(s), then it would not be considered that the development would be policy compliant. The removal of the railings would also improve permeability, and provide a continuous, uninterrupted riverside walk along this stretch of the river.

262. On the current Thames Path in front of Custom House, there is an existing wooden ramp that connects the Thames Path in front of Custom House to the Thames Path in front of Old Billingsgate that sits at a higher land level. The replacement would ramp would be situated further within the quayside so that this can be fully accessible and the steps would utilise the existing opening between the application site and Old Billingsgate. The design of this is discussed in the Design and Heritage section of this report. As a matter of principle, the improvements to the Thames Path are supported as it seeks to deliver the policy aims with Thames Policy and the Pool of London Key Area of Change.

263. As to create a comfortable pedestrian experience, the quayside would be pedestrianised, with access only for emergency vehicles and maintenance machinery.

264. The design, activation and greening of the proposed quayside are discussed in the Design and Heritage, Cultural Offer and Urban Greening sections respectively of this report.

265. Officers consider that the replacement of the existing carpark with a newly created public realm area on the quayside, that would interconnect with the Thames Path and provide unfettered public access 24 hours, 7 days a week year-round, would meet the policy objectives of improving access to the river

and riverside walk, would provide public open space along the riverfront and would contribute to improving the vibrancy of the riverside.

266. In light of the above, and subject to the imposition of conditions and S106 obligations, the proposed development is considered to comply with policies CS9, CS19 and DM19.1 of the Local Plan and policies S14, S17, S19 and OS1 of the emerging City Plan 2040.

Cultural Offer and Strategy

267. Policy CS11 of the Local Plan 2015 seeks to maintain and enhance the City's contribution to London's world class-cultural status and enable the City's communities to access a range of arts, heritage and cultural experiences in accordance with the City Corporation Visitor Strategy by:

- Providing, supporting and further developing a wide range of cultural facilities.
- Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate
- Protecting existing cultural facilities where there is need
- Providing visitor information and raising awareness of the City's cultural and heritage assets.
- Allowing hotel development where it supports the primary business or cultural need of the City.

268. Local Plan policies CS22 and DM22.1 support the provision of new community services. It is advised that development of *"new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:*

- *Where they will not be prejudicial to the business City and where there is no strong economic reason for retaining office use;*
- *In locations which are convenient to the communities they serve;*
- *In or near identified residential areas, providing their amenity is safeguarded.*
- *As part of major mixed-use development subject to an assessment of scale, character, location, and the impact of the proposal in existing facilities and neighbouring uses"*

269. The emerging City Plan under policy CV2 seeks opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and weekend and attract significant numbers of visitors into the City. Policy HL5 of the emerging City Plan 2040, expects the provision of new social and community facilities at flexible, multi-use spaces suitable for a range of uses. These spaces are considered to make a significant contribution to

people's mental, spiritual, physical well-being, sense of community, learning and education.

270. As the application site is within the Thames Policy Area, part 2 (iii) of CS9 of the Local Plan 2015 and part 1 (d) of S17 of the emerging City Plan seek to improve the vibrancy along the river by encouraging a mix of uses. Policy S17 also encourages a mix of cultural uses. Policy S19 encourages the provision of recreation, cultural events, arts and play in public spaces along the riverside, and ensuring their delivery through Culture and Vibrancy Plans.

271. The proposed cultural offer is set out in the submitted Cultural Strategy which has been prepared by Publica (February 2025). The strategy presented in this document was informed by the following engagement:

- Desk based research
- Engagement with potential cultural partners and with potential users of the engagement and gallery spaces

272. The Cultural Strategy sets out that the strategy has been developed has been based on the following principles:

- Provide public access, both formally and informally to the historic spaces of the Grade I listed building
- Communicate the history of Custom House and its role at the centre of London's global trade network
- Provide free and inclusive offers that will attract diverse populations
- Create dynamic spaces that can change and adapt according to need
- Create educational opportunities through internal displays and engagement spaces
- 24/7 public access to the quayside
- Compliment the proposed hotel use

273. A multi-faceted cultural strategy is proposed, which is listed and discussed below:

- Public ground floor route
- The Galleries
- Cultural Café
- The Tidewaiters Room
- Quayside
- The Long Room
- Public Historic Tours

Public Ground Floor Route

274. At ground floor level, new publicly accessible route through the building is proposed, which would connect Lower Thames Street with the Quayside. The route would pass through the lobby, Kings Warehouse and portico. The part of the route within the lobby would incorporate historic displays that would tell the history of Custom House, its roles and the development of the surrounding area. Within the part of the route that would be situated within the Kings Warehouse, seating would be proposed at the centre, and proportion of the display cabinets would be designed to museum standards as to be able to facilitate the loan of museum pieces and exhibition lighting would also be integrated. The displays within the Kings Warehouse part of the public route would cover a changing range of topics relating to the building's history.

275. The new route would be accessible to the public during the opening hours of the restaurants which are situated at ground floor level and would be accessible seven days a week; this would be secured within the S106 agreement.

276. A Cultural Implementation Strategy would be secured via the S106 agreement to ensure the delivery of the above prior to occupation and would be required to include details of the display cabinets designed to museum standards and exhibition lighting , as well as details of the regularity of the changing displays within the Kings Warehouse part of the route.

The Galleries

277. Within the West Wing, a sequence of historic rooms would function as flexible gallery spaces used to host small scale exhibitions. These gallery spaces would be curated by smaller organisations through a series of residences working with local groups, artists and specialist societies. The submission sets out that the lengths of the residences would vary, with some lasting a week and others three to six months. Examples of the types of exhibitions included in the Cultural Strategy includes mudlarking. The Galleries would be available free of charge to the public between the hours of 10am and 5pm.

278. The sequence of the historic rooms leads to the largest gallery space (60m²), which would also be an engagement space that schools, community groups, charities and cultural organisations can book to use free of charge, seven days a week between the hours of 10am and 5pm. The engagement space would be situated in brick vaulted room, which is being revealed as part of the application (the brick valuating is currently concealed). The space has been designed to accommodate a range of uses, the Cultural Strategy has shown how the space can be set up for a classroom setting, in an auditorium style, as well as for a standing event. The capacity of the engagement space varies depending on whether seating is required, for standing the capacity is 50 people and would 30 people for a seated event. The engagement space would incorporate

storage space for furniture, Wi-Fi, audio, visual and lighting equipment and a WC would also be provided to facilitate the use of the space. The toilet provided in the engagement space would not be an accessible toilet due to size constraints, however accessible toilets are provided at ground floor level and basement level, and direction to these facilities would be provided from the engagement space.

279. The primary entrance for the Galleries and quayside would be via the western quayside entrance, this route is stepped. The step free route would also be provided via the quayside terraces or the lobby.

280. A Cultural Implementation Strategy would be secured via the S106 agreement to ensure the delivery of the above and to ensure that this is provided upon occupation. The Cultural Implementation Strategy would be required to set out the procurement/commissioning process for the residences by local groups, artists and specialist groups; this should also set out how opportunities for inclusive procurement would be included. In respect of the Engagement Space, the S106 would secure that the space is available free of charge between the hours of 10am and 5pm for schools, community groups, charities and cultural organisations, and that storage space, a WC, furniture, Wi-Fi, audio, visual and lighting equipment would be provided. The Cultural Implementation Strategy would need to detail how this space would be advertised to the user groups (including the frequency of advertising) and how the process of booking the Engagement Space.

Cultural Café

281. A public facing café is proposed adjacent to the Galleries and engagement space. The café would be accessed via the quayside and would incorporate tables and chairs within the quayside. The walls of the café would be used for two-dimensional and three-dimensional displays for the cultural residences which would be secured for the Galleries as discussed above. The submitted cultural strategy sets out the combination of the cultural café, the galleries and the engagement space use will create a less formal area in the west wing that would provide a variety of activity to attract a broad range of users to the building.

282. The cultural café can be used by visitors independently from the rest of hotel, the submission sets out that the café would be family friendly and the intention is that it would be set a lower price point, although this is not subject to planning controls. The café would be open to the public during normal hotel opening hours and as minimum from 9am to 5pm, seven days a week and the hotel has the aspiration to extend the opening hours to the café into evening hours, but

this will be subject to demand. The Cultural Café (including displays discussed above) would be required to be available for use upon occupation.

283. As like for The Galleries, the Cultural Implementation Strategy would be required to set out procurement/commissioning process for the residences by local groups, artists and specialist groups; this should also set out how opportunities for inclusive procurement would be included.

The Tidewaiters Room

284. The Tidewaiters Room is a key historic room in which is adjacent to the West Wing courtyard. Primarily this room is guest lounge for the hotel guests, but it would host curated reference library. As this room would host a reference library, day passes would be available free of charge to academics, historians, researchers and students. There would be three days passes a day (except for Christmas Day, Boxing Day and New Years Day) for the lifetime of the development and would be available for use between the hours of 9am and 5pm; these should be available from occupation. These details would be secured via the S106 agreement. The Cultural Implementation Strategy that would be secured via the S106 agreement would need to set out how the reference library and free daily passes would be advertised (including frequency) and the booking process for a daily pass.

Quayside

285. As discussed above in this report, the proposals include the removal of the existing car park and railings to create a newly created public quayside that links with the existing Thames path. The public quayside would provide unfettered public access 24/7, 365 days a year. Two activation areas are proposed within the quayside, to the east and west, these areas would be used to host small scale performances, small scale music performances and food markets between the hours of 10am and 9pm. The submitted Quayside Activation Management Plan sets out that there would be approximately between 30 to 40 activities per year within the activation areas, and these will be programmed throughout the year taking into account tide predictions to minimise risk of coinciding with a flood event. The submission sets out that the activation would be delivered by the hotel operator in partnership with cultural organisations and local festivals, examples of organisations that have been engaged with include the Thames Festival Trust and Greenwich and Docklands International, which are organisations which currently run events along the Thames.

286. Electrical and water connections would be provided behind the flood wall in front of the southern façade to facilitate the use of the activation areas, and

these will be maintained by the hotel and will only be accessible when activities are in progress. In addition to facilitate the use of the activation spaces, storage for the activation infrastructure would be provided at basement level and the activation areas would be serviced utilising the proposed basement servicing (servicing is discussed in full in the Highways and Transportation Section of this report).

287. As unfettered public access is required 24/7, 365 days a year, no barriers, or structures etc that restrict access to any part quayside or ticketed events will be permitted and this will be secured within the S106 agreement. A full Quayside Activation Management Plan would be secured with the S106 agreement.

The Long Room

288. As part of the hotel, the Long Room would function events space for a range of events including conferences, wedding, hospitality etc. As part of the cultural offer, the Long Room would be able to be available to be booked free of charge for use by community or cultural groups. 24 slots (a slot is a morning, afternoon or evening) would be available each year would be able to be booked by community or cultural groups; set-up and take-down time would be provided for each slot so that community and cultural groups have sufficient time to do this prior to and after their event. The slots would be available on weekends as well as weekdays and would be available throughout the year; the slots should be available to book from first occupation. These details would be secured as part of the S106 agreement as well as a Cultural Implementation Strategy which will be required to set out how the use of this space free of charge to community groups would be advertised (including frequency) and the process for booking the use of the Long Room.

Public Historic Tours

289. As the building is Grade I listed and is of historic importance, free public tours of the building would be available. The tours would start on the quayside and would incorporate:

- Kings Warehouse
- Lobby
- Long room reception
- Function room
- Robing room
- Long Room
- Long Room terrace
- Tidewaiters Room
- Courtyard
- Cultural Café

- The Galleries
- Optional additional external route around the building façade

290. The tours will take place weekly, and at least once a month one of the weekly tours will take place at the weekend; the tours will be required to be available from first occupation. There would be 20 slots available on each tour and the tour would take a minimum of one hour. In addition to the weekly tours, the Cultural Strategy sets out that tours would be available on request for cultural, educational and community groups.

291. The S106 agreement would secure the details set out above and the Cultural Implementation Strategy would also be required to set out how the weekly tours would be advertised (including frequency), and how the tours can be booked. The Cultural Implementation Strategy would also need to detail how the tours on request for cultural, education community groups will be advertised (including frequency) and how these tours can be booked.

Other

292. The submitted Cultural Strategy also sets out that the hotel owner has commissioned an illustrated book on Custom House, with the book being available in each hotel room and copies would be available in all the publicly accessible spaces within the building. It is noted that this book is not necessary to make the development acceptable.

293. To support the cultural proposals, the toilet facilities in the reception and at lower ground floor level (including accessible toilets and Changing Places Facilities) would be available for public use during the opening hours of the public route through the ground floor and the cultural uses from occupation; this would be secured within the S106 agreement.

294. It is considered that the combination of the cultural proposals, would provide a robust and compelling cultural offer for the site and would act as new destination for the City and in accordance with polices CS9, CS11 and DM11.1. of the Local Plan, as well as policies S17, S19 and CV2 of the emerging City Plan 2040.

Archaeology

295. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. Paragraph 207 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.

296. Policy DM12.4 of the Local Plan 2015 and Policy HE2 of the emerging City Plan 2040 outline the requirements with regards to archaeology, outlining that the City will preserve, protect and safeguard and enhance archaeological monuments, remains, their setting, seeking inclusive access to, public display and interpretation where appropriate.

297. The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago, and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

298. An archaeological desk-based assessment (prepared by Mills Whipp, 2025) and archaeological evaluation report (prepared by MOLA, 2025) accompany the planning application. The desk-based assessment highlighted that the majority of the site is located on land reclaimed from the river. The original Roman masonry riverfront wall is likely to have been located running east-west through the north of the site. The wall has recently been Scheduled where it was found directly adjacent to the site at Sugar Quay and if remains of the wall survive on site they would be regarded as being of national significance. Other archaeological remains likely to be present on the site comprise medieval and post-medieval timber waterfronts. The desk-based assessment also highlights that geotechnical works have shown the eastern part of the current Custom House building was extensively underpinned in the earlier 19th century and it is anticipated that the raft extends under the central and western parts of the site, although no investigations have taken place in these areas. Archaeological watching briefs within the building have identified an extensive concrete raft of 19th century date is present beneath the structure which is likely to have removed all archaeology within the building's footprint.

299. The archaeological evaluation was focused to the south of the building, within the areas of proposed impact from the new development. The evaluation identified two earlier river walls of 19th century date and a cobbled surface. Archaeology pre-dating the 19th century was not identified although the trenches were not excavated down to natural ground due to site restrictions.

300. Within the current Custom House, proposed impacts comprise a new swimming pool and investigations around current foundations which may require some demolition and strengthening. The basement floor slab and some of the concrete raft may also need to be removed. The depth of the proposed swimming pool is currently unknown. However, the underpinning of the 19th century is believed to be so extensive that the new development is likely to have little archaeological impact. The swimming pool is located away from the likely location of the masonry Roman river wall.

301. Outside the current building, the main potential impacts on archaeology relate to the new ramp and basement extension along the southern frontage of the building. Excavations of up to 4.5m in depth will be required here and secant piled wall is also proposed. The archaeological evaluation has established that although archaeological remains of 19th century are present in this area, they are of local significance. If medieval or post-medieval waterfronts survive in this area below the 19th century material, the harm to them can also be mitigated through archaeological excavation and recording.

302. Historic England Greater London Archaeological Advisory Service (GLAAS) were consulted on this application, and they advised that it is recommended that a watching brief is carried out on the below ground excavations within Custom House and that the archaeological remains to the south of the building are mitigated by archaeological exaction and recording in advance of the development. There is low potential for the Roman riverfront wall to survive on the site, given the previous level of truncation and location of the proposed impacts within the building but foundation designed should allow for the preservation of the wall, should it be encountered during the watching brief. GLAAS also advised that the applicants Cultural Strategy could potentially be enhanced by the results of the archaeological excavation, and they also advised that that there is potential for salvage and reused of materials on site where appropriate.

303. GLAAS have requested that two conditions are attached to the planning permission, these conditions are in respect of a Written Scheme of Investigation and in respect of Salvage and Reuse.

304. An objection has been received from CoLAT who are of the view that an archaeological assessment of the works in the basement should have accompanied the application. Whilst officers note the comments made, however given the comments from GLAAS who provide advice to the City in respect of archaeological matters and the conditions they have requested, it is considered that sufficient information has been provided to make an assessment on this application.

305. Subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan 2015, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

Accessibility and Inclusivity

306. Accessible and inclusive design is covered by NPPF paragraphs 96 and 135, London Plan policy D5, Local Plan policy DM10.8 and emerging City Plan policy HL1. These policies seek to ensure that the City is inclusive and welcome for

all, with no disabling barriers that it is responsive to the requirements of all users.

307. London Plan policy D5 sets out how development should be informed by an inclusive design statement and detail engagement with relevant user groups. An Access Statement has been included within the Design and Access Statement. The proposals were presented to and reviewed by the City of London Access Group (CoLAG) on the 19 December 2024.

308. The closest stations to the application site are Tower Hill and Monument, both are over 400m from the application site and neither have no independent step-free access to and from trains. The nearest bus stops are circa 140m from the application site (noting that buses are not accessible to a range of people). As part of the Travel Plan that would be secured within the S106 agreement, the following details would be secured: details and the mapping of resting points of arrival by public transport to the entrances of the building; the testing of different scenarios for journeys including people who require step free access. In respect of taxis and community vehicles, a setting down point has been identified on Lower Thames Street and the details of this will be required to be included in the Travel Plan and preview information shown within the Inclusive Access Management Plan (IAMP) that would be secured by condition. Further to this the alterations required to the kerb would be captured in the S278 agreement with TfL, secured within the S106 agreement. Two on-street disabled bays are proposed on Water Lane (which are discussed in the Highways and Transportation section of this report), as they would be provided on Water Lane, new resting points are proposed on the route to the principal entrance on Lower Thames Street would be secured by condition. The IAMP secured by condition would be required to include details of onward travel and routes from the parking bays to the building and routes and travel in the event of a flood event and how this will be communicated.

309. Standards for inclusive cycle parking are in the London Cycle Design Standards (LCDS). The LCDS states that 5% of long and short-term cycle spaces should accommodated lager and adapted cycles. One accessible cycle space two Sheffield stands are identified at basement level which would be accessed via a step free route on the eastern side of the building. Full details of the accessible cycle parking spaces including details of the access route, the setting out of larger spaces, swept paths and end of trip facilities would be secured by condition. The accessible cycle spaces within the public realm should be located at the end of the Sheffield stands and this would be secured by condition. In addition to the details being secured by condition, the details of the cycle parking and end of trip facilities would also be required to be included in the IAMP so that users of the building can have information about the facilities prior to arriving at the building.

310. London Plan policy D5 states that entrances into buildings should be easily identifiable and should allow everyone to use them independently without additional effort, separation or treatment. The creation of new step-free entrances and the new route through the building from the north to south has the potential to transform the experience of the building for a range of people. There would be step free entrances on both principal elevations (Lower Thames Street and the Quayside), this would be achieved through a mix of regrading footways or adjusting existing openings. It is regrettable that step free access cannot be provided to the basement spa from the main entrance for the spa; step free access to the spa would be provided via the hotel which would be used by the public who need to. It would be would secured by the IAMP condition that details of the step free route for the spa should be made public by the building operator on their website.

311. On the southern elevation within the newly created Quayside, there would be paired ramps rising to a central entrance and with a defined central stepped entrance below, would minimise separation, special treatment or additional effort for a range of people. The full details of the ramped arrangement would be secured by condition. It is noted that during pre-application discussions, this aspect was discussed in detail with a range of options being explored as to achieve more inclusive access.

312. Vertical access through the building is principally achieved through stair/lift cores in the east and west wings of the building, with the central block also facilitating the north-south axis at ground floor level. Details of lift car sizes, door, floor and framing contrast, call buttons, two-way communications, tactile and braille signage would be secured by condition, along with the review of the contrast on the retained stairs. In respect of horizontal movement, due to the building being Grade I listed and its heritage significance, the building widths do not necessarily accord with the standards in Approved Document M and best practice in the BS 83000. The submission has identified where possible passing spaces and turning circles. Where doors are on an access route or to accessible rooms do not achieve 300mm to the leading edge, it is recommended that automated opening be added (where the individual door type can be adapted without loss of significance) and this would be secured by condition.

313. London Plan policy E10 requires for proposals for serviced accommodation to provide either 10% of new bedrooms to be wheelchair accessible or 15% of new rooms to be accessible in accordance with the requirements of 19.2.12 of British Standard BS83000-2:2018 Design of an accessible and inclusive built environment. Policy DM11.3 of the Local requires for hotels to be inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards and policy CV4 of the emerging City Plan 2040 requires for hotels to be inclusive, meeting the London Plan accessibility standards for new hotel rooms. The proposed development would provide 10% wheelchair accessible hotel rooms

in line with the London Plan. Accessible rooms would be available in both the east and west wing and would be available on each floor. The full details of the 10% wheelchair accessible rooms would be secured by condition.

314. A range of sanitary facilities are proposed. A Changing Places facility is proposed at basement level, which is suitable for use by people with multiple and/or complex impairments and up to two carers. The full details of the Changing Places facility would be secured by condition, and details are also required to be included in the IAMP which is also secured by condition. Wheelchair accessible toilets (AWC) are proposed at ground and basement level; the full details would be secured by condition, and details are also required to be included in the IAMP which is also secured by condition. It is secured by condition that the Changing Places facility and AWCs is accessible to the public during the opening hours of The Galleries, Engagement Space and Cultural Café or food and beverage uses at ground floor level, whichever is later, for the lifetime of the development.

315. An inclusive wayfinding strategy would be secured by condition to ensure that wayfinding is legible and intuitive.

316. The IAMP secured by condition would be required to include details of how building users will evacuate the building in a safe, timely and dignified manner (this should use scenarios for a range of building users), details of training frequency and issues of Personal Emergency Evacuation Plans.

317. Overall, the proposals accord with the aims of the relevant policies and subject to the imposition of the aforementioned conditions and S106 obligations, the proposed development accords with policy D5 of the London Plan, policy DM10.8 of the Local Plan and policy HL1 of the emerging City Plan 2040.

Highways and Transportation

318. The site is located alongside the River Thames and sits between the Tower of London and the Monument to the Great Fire of London. The site is bound by Lower Thames Street to the north; Old Billingsgate Walk to the west and Water Lane to the east.

319. The site benefits from excellent transport connections with Bank, Tower Hill, Aldgate and Mansion House London Underground stations all within 0.5 miles. Cannon Street and Fenchurch Street also offer National Rail services.

320. The site is therefore considered well located to encourage sustainable trips making in accordance with policy T1 of the London Plan which seeks to ensure that all development makes the most effective use of land, reflecting its connectivity and accessibility by existing public transport, walking, and cycling routes.

321. Regarding step free access, step free is available at Bank station (Northern Line and DLR).

322. The application site benefits from being highly accessible by non-car modes, including excellent levels of access to public transport (PTAL rating of 6b) as well as walking and cycling links in the vicinity of the Site. There are well maintained footways connecting the application site and these offer convenient access to the local area, local amenities as well as public transport opportunities such as the bus and rail services.

323. There is one main signalised pedestrian crossing on Lower Thames Street, which provides north-south crossing opportunities.

324. The site is located within a Key Area of Change, as part of Strategic Policy: S19 of the emerging City Plan 2040. The opportunities as part of the proposals to improve wayfinding over Lower Thames Street and improving connectivity between Lower Thames Street to Monument Street will be discussed in later sections of this report.

Trip Generation

325. The trip generation methodology is based on the TRICS database for comparable sites, with some adjustments to the mode shares by using the 2011 Census 'Method of Travel to Work' data and the applicable MSOA layer to reflect the local characteristics, and the high provision of public transport and the fact that this is a car free development. The existing office trip generation summary is shown below:

Table 5.1: Trip Generation Summary by Mode for Existing Office Use (19,794sqm GIA)

Mode	Percentage	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)		
		In	Out	Total	In	Out	Total
Car Driver	4.5%	18	2	20	2	19	21
Car Passenger	0.4%	2	0	2	0	2	2
Taxi	0.5%	2	0	2	0	2	2
Motorcycle	1.4%	5	0	5	0	6	6
Bus	6.2%	24	2	26	2	27	29
Underground	31.9%	125	11	136	137	16	153
National Rail	46.7%	183	16	199	16	200	216
Walk	4.6%	18	2	20	2	20	22
Cycle	3.8%	15	1	16	1	16	17
Total	**100%**	**392**	**34**	**426**	**35**	**428**	**463**

326. In summary, 426 two-way trips were generated for the AM peak and 463 two-way trips were generated for the PM peak.

327. The proposed trip generation for the hotel and gallery/event uses are also summarised in tables below:

Table 5.2: Trip Generation Summary by Mode for Proposed Hotel Use (179-rooms)							
Mode	**Percentage**	**AM Peak (08:00 – 09:00)**			**PM Peak (17:00 – 18:00)**		
		In	**Out**	**Total**	**In**	**Out**	**Total**
Car Driver	1%	0	1	1	1	0	1
Car Passenger	1%	0	1	1	1	0	1
Taxi	7%	3	5	8	5	3	8
Motorcycle	0%	0	0	0	0	0	0
Bus	5%	2	3	5	3	2	5
Underground	21%	8	15	23	15	10	25
National Rail	15%	6	10	16	10	7	17
Walk	48%	19	33	52	33	22	55
Coach	2%	1	1	2	1	1	2
Total	**100%**	**40**	**70**	**110**	**70**	**46**	**116**

Table 5.5: Trip Generation Summary by Mode for Proposed Gallery/Events Use (360sqm GIA)							
Mode	**Percentage**	**AM Peak (08:00 – 09:00)**			**PM Peak (17:00 – 18:00)**		
		In	**Out**	**Total**	**In**	**Out**	**Total**
Car Driver	0%	0	0	0	0	0	0
Car Passenger	0%	0	0	0	0	0	0
Taxi	3%	0	0	0	0	0	0
Motorcycle	0%	0	0	0	0	0	0
Bus	5%	0	0	0	0	1	1
Underground	29%	2	0	2	2	7	9
National Rail	33%	2	0	2	2	8	10
Walk	29%	2	0	2	2	7	9
Cycle	1%	0	0	0	0	0	0
Total	**100%**	**6**	**1**	**7**	**7**	**23**	**30**

328. The cumulative proposed development is expected to generate 117 trips during the AM peak and 146 trips during the PM peak: approximately 1,436 trips cumulatively across a typical day.

Time	Arrivals	Departures	Total (two-way)
08:00 – 09:00	46	71	117
17:00 – 18:00	77	69	146
Daily	667	769	1,436

329. The net change in trips generated from the existing to proposed, during the AM and PM peaks and for all travel modes, is shown on the table 5.10 below:

Table 5.10: Net Change in Trip Generation

Mode	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)		
	In	Out	2-Way	In	Out	2-Way
Car Driver	-17	-1	-18	-1	-19	-20
Car Passenger	-1	1	0	1	-1	0
Taxi	1	5	6	5	2	7
Motorcycle	-5	0	-5	0	-6	-6
Bus	-22	1	-21	2	-23	-21
Underground	-115	4	-111	6	-120	-114
National Rail	-175	-5	-180	-4	-185	-189
Walk	3	32	35	34	9	43
Cycle	-15	-1	-16	-1	-16	-17
Coach	1	1	2	1	1	2
Total	**-345**	**36**	**-309**	**41**	**-359**	**-317**

**Minor numerical discrepancies are due to rounding of numbers*

330. It is important to note that, despite the decrease in overall trips, there will be an increase in walking trips. The walking and wheeling experience will be enhanced through upgrades to the existing footways and improvements to the pedestrian-controlled crossing. These works will be carried out as part of the Section 278 Agreement with TfL.

Trip Generation – Servicing and Delivery

331. The CoL's Transport Strategy and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, state that:

The City's transport infrastructure will be maintained and improved by minimizing road danger, congestion, and reducing vehicle emissions by:

- Designing and managing streets in accordance with the City of London street hierarchy;
- Minimizing the impact of freight and servicing trips through measures such as the provision of on-site servicing facilities, timing deliveries outside peak hours, adopting area-wide solutions, freight consolidation, and promoting deliveries by foot or bicycle;
- Facilitating essential traffic, including emergency service vehicles, buses, freight, and private transport for people with particular access needs, while minimizing the environmental impact of these modes;
- Requiring the provision of infrastructure for alternative-fuel vehicles and zero-emissions vehicles, such as off-street vehicle charging points.

332. In addition, Part H of this Policy states that developers must demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans, and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimized as a result of their development. This includes promoting best practices such as direct vision standards and zero-vision policies to minimize the danger of travel and servicing. This aligns with the adopted policies of the Local Plan 2015, Strategic Policy CS16.

333. A cap of 28 deliveries per day was agreed, equivalent to 56 two-way trips per day. The proposals also include trips associated with refuse collection and facilities management. Deliveries made by more sustainable modes, such as fresh food and drink delivered by cargo bike, do not count towards the daily trip totals. This approach is in line with delivery arrangements approved for hotels within the City. As the proposed scheme is car-free, any vehicle movements associated with it will be limited to deliveries and servicing only.

334. A breakdown of anticipated hotel deliveries by vehicle type is shown in the table below.

Table 6.3: Breakdown of Anticipated Hotel Deliveries by Vehicle Type		
Mode / Vehicle Type	**Average Percentage**	**Average Number of Deliveries**
Bicycle	1%	<1
Motorbike	4%	1
Car	1%	<1
Transit Van	56%	16
3.5T Van	17%	5
Up to 7.5T Vehicle	17%	5
Refuse Vehicle	4%	1
Total	**100%**	**28***

*Number subject to rounding.

335. A planning condition will establish that all delivery trips must take place outside the periods of 07:00–10:00, 12:00–14:00, and 16:00–19:00, in line with the City of London (CoL) peak restrictions. Overnight servicing between 11pm and 7am the next day is permitted

336. Regarding delivery consolidation, CoL would expect the applicant to implement a consolidation strategy, reducing trips by 50%. This would result in the development generating 28 two-way trips daily and help reduce forecast demand, as mentioned above. Servicing area access points are away from the highway, complying with Policy VT2 of the draft City Plan 2040, to ensure that arriving vehicles have a place to wait off the highway, preventing any congestion or delays for pedestrians, cyclists, and other vehicles and therefore ensuring road safety. The proposals for delivery and servicing comply with City Plan policy S9, due to the provision of on-site servicing facilities and encouragement of deliveries by cargo bike.

337. It is recommended that the Delivery and Servicing Management Plan (DSMP) should include a 'Maintenance and Management Strategy' for the vehicle lift.

338. Overall, subject to a S106 obligation to secure a Delivery and Servicing Plan, it is not considered that the proposed servicing arrangements would result in any undue implication on the public highway, nor highway safety in general and are considered acceptable. The proposals comply with Local Plan 2015 policies DM16.1 and DM16.5 securing the provision of blue badge spaces and car-free requirements. The proposals also comply with the emerging City Plan 2040 policies S9, VT2 and VT3. Refuse Management and Waste Strategy 252 874. Local Plan policy DM17.1 requires development schemes to incorporate waste

facilities and allow for the separate storage and collection of recyclable materials.

Pedestrian Comfort Levels (Pedestrian Footway Assessment)

339. Pedestrian Comfort Level (PCL) is a measure used to assess how comfortable and safe a pedestrian environment is, particularly in terms of space and flow. It is commonly used to evaluate footway conditions and ensure they meet the needs of pedestrians.

340. PCL levels range from A to E, representing varying degrees of suitability for pedestrian movement. These levels are categorised as: comfortable, acceptable, at risk, and unacceptable/uncomfortable.

341. PCL assessments are typically required when a development is expected to generate significant pedestrian flows or when existing footway conditions may be insufficient to accommodate increased demand comfortably. In this case, the anticipated increase in pedestrian trip will be mitigated through targeted improvements, including improvements to existing footways and the controlled pedestrian crossing at Lower Thames Street, as part of the Section 278 works.

Cycle Parking

342. London Plan Policy T5 requires cycle parking to be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 also requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards, and that developments should cater for larger cycles, including adapted cycles for disabled people. The emerging City Plan 2040 Policy AT3 also accords with London Plan Policy T5.

343. Long stay cycle parking spaces will be located within the basement. The long stay cycle store will also include hotel short stay cycle parking spaces.

344. The cycle store comprises 24 two-tier rack spaces, including 4 short-stay spaces for the hotel, and is located in the basement. Additionally, 2 accessible Sheffield stand spaces will be provided. Shower and changing facilities, as well as lockers, are also to be included.

345. A total of 82 short-stay cycle parking spaces will be located within the areas of public realm surrounding the site; however, these will not be permitted within the public highway. An additional 60 spaces will be provided on-site within private land, distributed between Billingsgate Walk and Water Lane. The 9

Sheffield stands (18 spaces) previously proposed to be located on TfL highway on Lower Thames Street will be instead re-provided in the form of a payment in lieu contribution towards cycle infrastructure (£10,800). This has been done to maintain footway widths on Lower Thames Street, to ensure space for pedestrians.

346. The table below, shows the requirement in compliance to with the London Plan and provision.

Land Use	**Area (GEA)**	**Long-stay spaces**	**Short-stay spaces**
Hotel	179 Rooms	9	7
Food and Beverage including Cultural Café	1,464 sqm	9	74 (of which 18 spaces – payment in lieu)
Gallery, Engagement and Display Space	373 sqm	1	4
Total		19	82 (64 excluding cycle infrastructure contribution)

347. To conclude, the proposed cycle parking provision complies with London Plan standards. End-of-trip facilities and the cycle store will be designed in accordance with LCDS standards, as required by London Plan Policy T5. This also aligns with the emerging City Plan 2040 Policy AT3.

348. The applicant will be responsible for promoting the use of the cycle parking spaces and, as such, will be required, through a Section 106 obligation, to produce a Cycling Promotion Plan as part of a Travel Plan. This plan must address both long-stay spaces and ensure public access to short-stay spaces. It will need to be submitted to the City for approval in line with London Plan Policy T4.

Car Parking

349. The proposals would be ‘car free’ except for two disabled car parking spaces located on Water Lane. Occupiers will inform the management company should they require the use of a blue badge space.

350. The management company will monitor the demand for blue badge car parking spaces through a record of those tenants that are Blue Badge holders. Blue Badge spaces will be identifiable through the introduction of appropriate

signage. Any parking outside of designated bays, or without a valid permit / Blue Badge, will be enforced robustly by an on-site management team.

351. Based on the above, the current approach to car parking is supported and based on encouraging sustainable travel choices and improving access for those with mobility needs. This is in accordance with Policy VT3 of the Draft City Plan 2040.

Off-site parking

352. Car-free development can in some cases lead to parking displacement on the surrounding highway network. However, the whole of the City of London is covered by a controlled parking zone, (CPZ) active Monday to Friday from 0700-1900 and Saturdays from 0700-1100. During these times motorists must pay to park in pay and display bays and must not park on single, double yellow lines or double red lines (TFL routes).

Refuse Management/Waste Strategy

353. The proposed servicing strategy is for refuse and recycling to be collected off-street from the proposed service yard, accessible via Water Lane via the vehicle lift. The service yard can accommodate up to 2 vehicles are one time and has been designed to accommodate vehicles up to 8m long. A turntable is provided to allow vehicles to enter and egress the vehicle lift and site, in forward gear.

354. Servicing and deliveries to this development will comply with CoL's peak restrictions of no deliveries between 7-10am, 12-2pm and 4-7pm.

355. A Delivery, Servicing and Waste Management Plan has been produced as part of the overall planning submission.

356. The waste storage area is proposed to be located within the basement. Bins will be wheeled to the service yard area, where waste will be transferred to refuse collection vehicles, all to take place on the same ground floor level.

357. The table below shows how each proposed waste stream will be stored, the amount of Eurobins and or wheeled bins will be provided.

Waste Stream	Container Type	Quantity
General Waste Storage	1,100L Eurobin	4
Mixed Recycling Storage	1,100L Eurobin	9

Food Waste Storage	240L Eurobin	6

358. With the information presented in this report section, the proposed waste strategy is considered acceptable.

Oversailing/ Undersailing

359. Structures that permanently oversail the public highway must be licensed by the local authority, typically in accordance with Section 177 of the Highways Act 1980.

360. Oversail and undersail areas are not being proposed within this application.

Highways Boundary – Stopping Up and Adoption

361. As the highway authority, the City of London has the power to stop up areas designated as highway land by making orders known as 'stopping up' orders. The term 'stopping up' means that once such an order is made, the highway land ceases to be a maintainable highway at public expense and is extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent.

362. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorising the stopping up or diversion of a highway if it is satisfied that it is necessary to do so to enable development to be carried out. That process would be carried out under separate procedures from the considerations of the applications currently before you.

363. Areas of privately owned land can alternatively be ‘offered up’ for adoption as public highway, for instance, for the creation of a new ‘estate road’ to be adopted and maintained by the local authority.

364. Stopping up areas have not been identified within the proposals.

City Walkway

365. The existing route alongside the River Thames would be replaced by new, fully accessible pedestrian routes at ground level. The intention is for the new route to be designated as City Walkways, provided the area is constructed to acceptable standards. The details of the routes would be secured through conditions and subject to internal technical review and inspection processes prior to declaration.

366. The declaration of the route will be made under the provisions of the City of London (Various Powers) Act 1967.

Highways Works – Section 278 Agreement

367. In accordance with our current transport strategy (May 2019):

> *"Walking is, and will remain, the main way that people travel around the Square Mile. We want people walking in the City to feel that their needs have been prioritised. By delivering this Strategy we will make the experience of walking on our streets a more enjoyable and rewarding experience"*

368. In accordance with the emerging City Plan 2024:

> *"10.2.1 Major developments can have a significant impact on the function of existing streets and spaces and any adverse impacts must be mitigated by highway works and public realm interventions that enhance the quality of the City's streets and public spaces."*

369. To ensure the development is acceptable in planning terms and delivers a public benefit upon completion, the applicant will be required to enter into a Section 278 Agreement with TfL for highway improvement works. These works will include the creation of an accessible and enhanced highway designed to accommodate both new and existing users.

370. The application acknowledges pedestrian access issues caused by the surrounding highway infrastructure. To address this, a taxi/private hire lay-by is proposed to the north of the site. TfL maintains that its support for any new lay-by on the TLRN is contingent upon the development delivering a comprehensive package of active travel improvements. These must include enhanced public access to the quayside and upgrades to surrounding streets, including Lower Thames Street.

371. TfL also requests improvements to the pedestrian crossing at the northern frontage of Custom House. This should be secured through a Section 278 agreement and referenced in the Section 106 (S106) agreement. Streetscape decluttering, along with improvements to the paved areas adjacent to the site, should also be considered.

372. Although a Road Safety Audit has been submitted in accordance with TfL procedures, further design discussions with TfL are strongly recommended—particularly regarding pedestrian crossing enhancements.

373. Based on the above comments from TfL, the scope of the Section 278 works will include reinstatement of areas following construction, as well as any changes to the public highway required to accommodate the new site layout (including, but not limited to):

Lower Thames Street

- Reconstruction of the footways adjacent to the application site
- Construction of the pick-up and drop-off layby and associated drainage
- Resurfacing of the carriageway fronting the site
- Provision of road markings
- Improvements to the existing controlled crossing and associated traffic signals work

Construction Logistics Plan

374. The proposal involves a significant amount of demolition and construction work, which will generate a large number of construction vehicle movements during the overall construction period. These proposed works could significantly impact the operation of the public highway in the local area if not managed effectively. The primary concern is public safety, but it is also essential to ensure that construction traffic does not unreasonably create or add to existing traffic congestion or impact the road safety or amenity of other highway users.

375. The proposal is also likely to lead to various amenity issues for local businesses that need to be carefully managed (e.g., noise, vibration, air quality).

376. To mitigate the above, an outline Construction Logistic Plan (CLP) has been submitted in support of the planning application.

377. This plan provides information describing the proposed works and how, at this preliminary stage, they could be undertaken. It also details how the impacts associated with the construction period would be mitigated and highlights concerns of local stakeholders early on to ensure these are accounted for within the detailed Construction Logistics Plan. This requirement should be secured by condition and prepared once a Principal Contractor has been appointed.

378. This document will need to align with Transport for London's Construction Logistics Plan Guidance and will be subject to City of London approval before demolition and construction can commence. The detailed Construction Logistics Plan should highlight, among other things, how public liaison and coordination with other nearby construction sites will be managed. The appointed contractor will be required to join the construction cluster groups, which are groups formed by nearby construction sites holding regular meetings with the attendance of the City of London's highways officers to ensure coordination.

379. It is anticipated that most construction activities will take place off the public highway, as seen in the image below.

380. Commencement of works will be subject to appropriate legislation under the London Permitting Scheme, which falls under the Traffic Management Act 2004.

381. If planning permission is granted, the submission of a detailed CLP should be secured separately via condition to ensure the construction and demolition of the site comply with The London Plan Policy T7 and DM16.1 of the City of London Local Plan 2015 and with the emerging City Plan 2040. This would provide a mechanism to manage and mitigate the impacts the proposed development would have on the local area. The detailed CLP would need to be approved by the City of London prior to the commencement of works on site, should planning permission be granted.

Conclusion

382. The scheme benefits from high levels of public transport accessibility, would be car-free and it promotes cycling and walking as sustainable modes of transport. The proposals are considered acceptable in transport terms, subject to conditions and S106 obligations.

383. Should planning permission be granted the following conditions (as a minimum) along with the Section 278 of the Highways Act 1980 to be secured:

- A planning condition requiring the provision of 19 long stay cycle parking spaces, 82 short stay cycle parking for the entire development, designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved, and approval should be reserved by condition.
- A planning condition to secure the detailed Construction Logistics Plan (CLP). The condition shall state that the detailed CLP shall be required to be approved prior to any works starting on site. Highways licences should not be sought until the CLP has been approved by the planning authority.
- A S106 obligation to secure a Delivery and Servicing Management Plan (DSMP) including details as referenced within this report (but not limited to). The clause shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be adhered to.
- A S106 obligation to secure an Accessible Car Park Management Plan (ACPMP) including details of how the accessible parking spaces will be managed to accommodate the users and their requirements.
- A S106 obligation to secure a Travel Plan (TP) for the development. The obligation shall state that the TP shall be approved prior to the first

occupation of the site and the approved travel plan shall be followed for 5 years, unless otherwise agreed with the Highway Authority.

384. Subject to the conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies, Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T5 Cycle Parking, T6 Car Parking, T7 Deliveries, Servicing and Construction.

385. It accords with the Local Plan 2015 Policy DM 16.1, 16.2, 16.3, 16.4, and 16.5, as well as DM3.2. It also accords with the draft City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. As such, the proposals are considered acceptable in transport terms.

Environmental Impacts of the Proposals on the Surrounding Area

Wind Microclimate and Thermal Comfort Assessment

386. Local Plan Policy DM10.1 requires that all developments be of a high standard of design by ensuring that the design, and materials avoid unacceptable wind impacts at street level. Emerging City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions wind conditions and thermal comfort. London Plan policy D8 requires consideration to be given to the local microclimate created by buildings and the impact of service entrances and facades on the public realm.

387. Custom House is an existing four storey building which has been in situ since the early 19th Century. There would be no significant changes to the massing or the height of the existing building as part of the proposed development.

388. Thus, it is considered that the proposal would have no impact with regard to wind microclimate or thermal comfort from a planning perspective and is in accordance with London Plan policy D8, Local Plan 2015 policy DM10.1 and emerging City Plan policies S8, S19 and DE2 and the guidance contained within the Planning Advice Notes; Wind Microclimate Guidelines and Thermal Comfort Guidelines for Developments in the City of London.

Daylight, Sunlight and Overshadowing

389. London Plan Policy D6D states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. Policy DM10.7 states that development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces to unacceptable levels will be resisted. Policy HS3 of the emerging City Plan

states that all development proposals should be designed to protect the daylighting and sunlighting levels to adjacent residential accommodation.

390. Consideration been given as to whether the scheme would give rise to any unacceptable loss of daylight, sunlight, or overshadowing to nearby residential properties. The minor increase in roof height to the East Wing of the would have no impact on the occupiers of Sugar Quay to the east or any other residential properties in this respect due to the separation distances between the properties.

391. The proposal has been designed to avoid loss of daylight, sunlight or overshadowing. As such, it would comply with Local Plan Policies DM10.7, Policy HS3 of the emerging City Plan 2040 and London Plan Policy D6D.

Overlooking, Privacy, Outlook and Overbearing Impact

392. Local Plan Policy DM21.3 and emerging City Plan Policy HS3 of the emerging City Plan 2040 seek to protect the amenity of existing residents. Proposals should be designed to avoid overlooking and protect privacy. It is highlighted that the current Local Plan and emerging City Plan assess residential amenity and not the amenity of commercial occupiers.

393. Consideration has been given as to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential properties. There would be no new window openings proposed and no new balconies or terraces, other than those at the ground floor adjacent to the river which is sufficiently sent from residential properties. Thus, no new views would be created.

394. As with the daylight and sunlight, the minor increase in roof height to the East Wing of the would have no impact on the occupiers of Sugar Quay or any other residential properties in terms of overbearing impact or harm to outlook due to the separation distances between the properties.

395. The proposal has been designed to avoid overlooking and an overbearing impact and seeks to protect current levels of privacy and outlook. As such, it would comply with Local Plan Policies DM21.3 and CS5 and Policy HS3 of the emerging City Plan 2040.

Light Pollution

396. Local Plan Policy DM15.7 and emerging City Plan 2040 Policy DE8, requires that development incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

397. The applicant has produced an External Lighting Statement which outlines the proposed external lighting to the facades and public realm. In this document, it is acknowledged that the primary sensitive receptor is Sugar Quay, the residential development to the east. No facade lighting is proposed for the building's eastern facade. Modelling indicates illuminance levels at the windows of Sugar Quay will be below 5lux. Façade lighting is proposed to the northern and southern elevations. Initial modelling of the proposed facade and public realm lighting indicates spill light levels of around 2 lux.

398. The proposal has been reviewed by the City's Environmental Health Officers who requested a condition is included which requires a detailed lighting strategy to be submitted prior to the commencement of relevant works, demonstrating the measures that would be utilised to mitigate the impact of light pollution on residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity in line with the City's Lighting SPD.

399. Subject to the imposition of the condition, the proposed development would comply with Local Plan policy DM15.7 and emerging City Plan 2040 Plan policy DE8 and has been designed to avoid light spill.

Flood Risk

400. London Plan policy SI12, Local Plan polices CS18, DM18.1 and DM18.3 and emerging City Plan 2040 policies S15, CR2 and CR4 are the relevant policies for addressing flood risk. These require that developments deliver a reduction in flood fisk terms, demonstrate the suitability of the use in flood risk terms, reduce the risk of flooding from surface water, reduce rainwater run-off ensure that flood defences provide the highest category of protection for the City, building in flood resistance and resilience.

401. The application site is located within the City Flood Risk Area, Flood Zone 3, and as such a Flood Risk Assessment has been submitted with the application. This document covers the sequential and exception tests, flood defences, flood gate and basement flood protection and flood emergency plans.

402. The assessment finds that flood risk from surface water, ground water, sewers and artificial water bodies is deemed to be low for the application site. The most significant source of potential flooding is from the River Thames. When a flood event occurs, the water from the Thames overtops the river wall adjacent to the foreshore (not the flood defence wall) and advances up the quayside. The building is protected by flood defences along its southern edge, meaning that the flood risk to the building is a residual one, which would only be realised in the event of a breach on the said flood defences.

403. The statutory flood defence line for the River Thames comprises the flood defence wall which closely follows Custom House's southern façade and forms the parapet of the basement lightwell. A ramp down to the existing basement exists along the southern façade of the building, which is accessed via Water Lane, this forms a gap in the defence line, and this is presently protected by a manually operated flood gate. To the east and west of Custom House (Water Lane and land adjacent to Old Billingsgate Walk), the flood zone is naturally curtailed as the ground levels rise towards Lower Thames Street.

404. The proposed development incorporates flood resilience measures. The existing statutory flood defence wall which closely follows the southern façade, has an existing top of wall height of 5.850m AOD to 5.97m AOD. In responding to the potential climate change levels, it is proposed to raise the height of the wall to the year 2100 level of 6.35m AOD. To achieve this, the existing walls will need to be demolished and reconstructed as new reinforced concrete wall with granite facing and copy to the quayside (the design and heritage impacts of this are considered and assessed in the earlier Design and Heritage section of this report). The Flood Risk Assessment sets out that temporary flood defences may be required during the construction if the demolition and re-construction of the eastern and central defence walls cannot be achieved whilst leaving the current wall in place; it is noted that these works would require a Flood Risk Activity Permit application to be submitted and approved by Environment Agency, an informative would be attached reminding the applicant that a Flood Risk Activity Permit would need to be secured prior to any works taking place.

405. It is proposed for the existing vehicular ramp down to the basement to be removed and replaced by a vehicular lift (the design and heritage impacts of this are considered and assessed in the earlier Design and Heritage section of this report). The Flood Risk Assessment sets out that in place of the existing ramp, the flood defence wall is to be set back closer to the building and the paved quayside area extended further north which provides an element of flood compensation within this area. During pre-application discussions with both Officers and the Environment Agency it was discussed as to whether the flood gate could be replaced by passive flood defence; this option was discounted due to the visual impact on the Grade I listed building and impact on pedestrian permeability and emergency access. As such as automatic hydraulic flood barrier is proposed to be installed within the new raised portion of the flood wall. The Environment Agency were consulted on the application and subject to conditions in respect of the detailed design and a flood gate operational contingency plan, they raise no objection to the proposed automatic hydraulic flood barrier.

406. The existing building benefits from two points of access and egress to the basement from riverward of the statutory defence line- the basement access ramp and fire escape lightwell on the western façade. As part of this application, the access to the western lightwell will be fitted with a new flood barrier and the

access to the eastern lightwell would be infilled as part of the new basement proposals, once infilled, the only location where access to the breach flood level from riverward of the statutory defence line would be the opening in the flood wall providing access to the vehicle lift, as well as the pedestrian access to the basement.

407. The proposed alterations to the southern façade which include the creation raised terrace area with a ramped access would result in encroachment into the statutory defence line, whereas the removal of the basement ramp and narrowing of the western wing lightwell would provide some retreating of the defences. The proposed encroachments and retreating of the defences would result in 327.3m³ of the total flood volume to be lost, however, a compensation volume of 208.4m³ for both the 2065 and 2100 levels due to the external terrace proposals. Overall, the flood volume loss would be 118.9m³. The proposals have been reviewed by the Environment Agency who confirmed that this is acceptable in this instance due to the improvements made with regard to the flood defences.

408. National policy requires a sequential, risk-based approach to the location of development, which aims to steer development towards areas with the lowest probability of flooding. Land uses are categorised according to their vulnerability to flooding with different uses being deemed acceptable or not in different flood zones. A Sequential Test is used to apply this policy approach, with an Exceptions Test required for 'more vulnerable' development to be considered in Flood Zone 3. Under national policy an office is classed as 'less vulnerable' use whereas a hotel increases the vulnerability classification to 'more vulnerable'. The City's current Local Plan and emerging City Plan 2040 reflect this national policy approach to flood risk.

409. National Planning Practice Guidance (PPG) indicates that that Sequential Test and the Exception Test do not apply to applications for most forms of change of use, although it recognises that a change of use may involve an increase in flood risk if the vulnerability classification is changed. In such cases, PPG states that the applicant will need to show in their flood risk assessment that future users of the development will not be placed in dangers from flood hazards throughout its lifetime, adding that, depending on the risk, mitigation measures may be needed.

410. As the application is for a change of use the sequential test is not required as set out by policy. Both the Local Plan and the emerging City Plan 2040 require for a site-specific flood risk assessment to be submitted to address the increased vulnerability of the hotel use. The submitted flood risk assessment sets out that the uses classified as more vulnerable (hotel rooms) would be at ground floor level (above the breach flood level) and above and would not be situated at basement level. Further to this, the flood risk assessment sets outs

how safe and suitable access and egress can be provided to beyond the breach flood water on Lower Thames Street.

411. Both the Local Plan and emerging City Plan 2040 require for the Exception Test to be demonstrated; this is because the development proposes a 'more vulnerable use' in EA Zone 3a. In the supporting text of both plans, it is recommended that the developer will need to investigate whether there is a reasonably available site outside of the City flood risk area would be more suitable for the intended use and goes onto state that the developer must demonstrate through the exception test that the benefits of the development outweigh any risk from flooding. It is noted that the exception test in the submitted flood risk assessment does not investigate if there is a reasonably available site outside of the City flood risk area as recommended by the supporting text of policy. Officers consider the benefits associated with preserving and bringing the Grade I listed Custom House back into use, the increased quantity and quality of the public realm through the creation of the publicly accessible quayside, and improving the vibrancy of the riverside, outweigh the risk from flooding. It is highlighted that the Environment Agency were consulted and subject to conditions they raise no objection to the proposed development.

412. The proposals have been reviewed by both the Environment Agency and the LLFA, who subject to the imposition of conditions, raise no objection to the proposed development.

413. The applicants have prepared a Flood Evacuation Plan (prepared by Elliot Wood) in accordance with the Development Plan and the City Corporation's draft Flood Emergency Plans for New Developments Planning Advice Note. The aim of this document is to provide background and advice to the eventual hotel operator to enable them to prepare specific emergency planning procedures, undertake staff training, understand flood warnings and procedures, to identify evacuation routes and to ensure the safe evacuation access and egress of Custom House in the event of a breach of the flood defence wall. This is a live document and would be maintained, enacted and reviewed by the hotel operator. It is noted that it is not within the remit of the EA to comment on these documents.

414. Subject to conditions, the proposed development is considered to comply with policy SI 12 of the London Plan, polices CS18, DM18.1 and DM18.2 of the Local Plan and policies S15, CR2 and CR4 of the emerging City Plan 2040.

Sustainable Urban Drainage Systems (SuDS)

415. Policy SI13 of the London Plan, polices CS18 and DM1.2 of the Local Plan and policies S15 and CR3 of the emerging City Plan 2040 are the relevant polices in respect of SuDS. These policies set out a drainage hierarchy, state that

developments must incorporate SuDS principles and that SuDS features should be integrated into the design of the building and landscaping.

416. The application is accompanied by a Sustainable Drainage Strategy (prepared by Elliot Wood). This sets out that the existing arrangement is for both foul and surface water to be discharged to the combined sewer on Lower Thames Street and that there is no formal drainage network for surface water run-off from external areas that surround Custom House (Old Billingsgate Walk, Water Lane and the existing parking area), and as such surface water run-off flows overland following the topography of the site before overtopping the listed river wall along Custom House Walkway and discharging into the River Thames.

417. The Sustainable Drainage Strategy (prepared by Elliot Wood) sets out how the existing arrangement would be developed in respect of surface water. It is proposed for water from the roof to be collected and drained to basement level and from here it would be piped below the quayside to discharge into the River Thames via a new outfall through the listed wall. Appropriate licences and permissions would need to be obtained including but not limited to from the Environment Agency, Thames Water, the Port of London Authority and the Marine Management Organisation for the discharge and any associated works. The impact of the proposed works on the listed wall are considered above in the Heritage section of this report.

418. The LLFA has reviewed the proposals and raises no objection subject to the imposition of conditions in respect of detailed SuDS design and in respect of lifetime maintenance.

419. Subject to the imposition of the aforementioned conditions, the proposed development would accord with policies SI 13 of the London Plan, policies CS18 and DM18.2 of the Local Plan and policies S15 and CR3 of the emerging City Plan 2040.

Air Quality

420. Local Plan 2015 policy CS15 seeks to ensure that development positively addresses local air quality. Policy DE1 of the emerging City Plan 2040 states that London Plan carbon missions and air quality requirements should be met on sites and Policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues must terminate above the roof of the height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

421. An Air Quality Assessment has been submitted with the application which assessed the likely impact of the proposed development on air quality as a result of the construction and operational phases of development.

422. The assessment of vehicle emissions from the construction and operational phases has been scoped out due to the predicted increase in traffic being lower than the IAQM/EPUK best practice guidance assessment levels. As part of the development there are circa 100 existing car parking spaces are to be removed which is welcomed. The development would be 'car-free', with the exception of two accessible car parking spaces, and servicing vehicles will be the only vehicle movement associated with the development. A Delivery and Servicing Plan has been submitted as part of the application.

423. The development would be air quality neutral, as per GLA guidance, with the development being 'car-free' and heating and cooling demand provided by air source heat pump technology. It should be noted that that emissions from service and delivery vehicles and emergency life-safety backup power generation are excluded from Air Quality Neutral Assessments.

424. The development proposed the installation of a single backup diesel generator. The technical specification for the proposed generator is not known at this stage therefore further details would be required to be submitted via condition. Additionally, it is stated within the AQIA that the generator would provide a level of business continuity rather than solely life-safety provisions. Due this a revised Air Quality Neutral Assessment would be required to be submitted via condition. Aside from a brief statement regarding UPS, alternative to the diesel generator for emergency power supply have not been explored, therefore an assessment of alternatives will be required to be completed as part of a condition.

425. The City's Air Quality Officer has reviewed the submission and has no objection subject to the imposition of conditions in relation to Emergency Power Supply, Air Quality Neutral Assessment, Combustion Flues, and Non-Road Mobile Machinery register.

426. Subject to the imposition of these conditions, the proposed development would accord with Local Plan policy CS15, policy DE1 of the emerging City Plan 2040 and policy SI1 of the London Plan which all seek to improve air quality.

Noise and Vibration

427. Paragraph 194 of the NPPF requires planning policies and decisions to ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment. It emphasises mitigating and reducing to a minimum potential adverse impact resulting from noise from new

development and avoiding noise that gives rise to significant adverse impacts on health and quality of life.

428. London Plan polices D13 (Agent of Change) and D14 (Noise) require development to limit and mitigate noise impacts, placing the responsibility for mitigating noise impacts on new developments.

429. Local Plan polices CS21 (Housing) and DM21.3 (Residential Environment) and emerging City Plan 2024 policies S3 and HS3 require the amenity of existing residents in identified residential areas to be protected.

430. Local Plan policy DM15.7 and emerging City Plan 2040 policy HL3 require noise pollution to be considered.

431. As set out above in the 'Provision of Hotel Accommodation' section of this report, policy DM11.3 of the Local Plan and policy CV4 of the emerging City Plan 2040, state that hotel uses will only be permitted where they do not result in adverse impact on the amenity of neighbouring occupiers, including cumulative impacts.

432. The character of the area is mixed use in nature and this includes residential, with the nearest residential units being situated to the immediate east at Sugar Quay.

433. The main considerations in terms of noise and vibration are during the deconstruction and construction and operational phases of the development. The application is accompanied by a Noise Report (prepared by Sandy Brown).

434. Noise and vibration during mitigation during deconstruction and construction phases of development, including control over working hours and types of equipment used would be secured in a Scheme of Protective Works secured by condition and freight movements would be controlled through the Deconstruction and Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.

435. Noise levels from mechanical plant in the development when operational would need to comply with the City of London's standard requirements that noise input should be 10dB below the background noise level and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.

436. The submitted Noise Report has given consideration as to whether the noise levels within the hotel rooms would be acceptable, this is of particular importance for the hotel rooms fronting onto Lower Thames Street which is a

busy arterial road. As discussed in the Heritage section of this report, there a range of options proposed to improve both the noise and thermal performance of the windows, with the final approach for each individual window being secured by condition. Environmental Health have reviewed the Noise Report and subject to a condition in respect of internal noise levels for the hotel rooms, the proposed amenity provided to the users of the hotel rooms is considered to be acceptable.

437. At ground floor level, two raised terraces are proposed which would provide additional seating for the food and beverage uses at ground floor level and at first floor the existing balcony off of the Long Room would be utilised. The terraces at ground floor level would have a maximum capacity of 80 each and the terrace at first floor level would have a maximum capacity of 25. The submitted noise report sets out that no music would be permitted on these terraces. Environmental Health Officers have been consulted and subject to conditions restricting the hours of use to be 7am and 10pm and in respect of restricting live or recorded music, consider that the use of the terraces would have an acceptable impact on the residential amenity of the occupiers of nearby residential units, including the closest at Sugar Quay.

438. As discussed within this report, a new publicly accessible quayside would be created. Public access would be unfettered being provided 24 hours a day, 365 days a year. Two activation areas are proposed within the quayside, to the east and the west: with the one to the east being the closest to the residential units at Sugar Quay, it is noted that the eastern activation area is the smaller of the two activation areas. It is envisioned that the activation areas could be used to host small scale performances, music performances and food markets. The submission sets out that all activity within the activation areas would be between the hours of 10am and 9pm and that there would be no more than 40 events per year.

439. The submitted noise report, has assessed three scenarios in respect of quayside activation, these are:

- Scenario 1- Baseline, no activation of events zones, typical operation of the terraces at maximum capacity

- Scenario 2- event in the western zone with a crowd of 250 people, 50 people in the food truck area, external terrace occupied:
    (a) Scenario 2a – Event with music (acoustic, jazz, classical)
    (b) Scenario 2b- Event with someone speaking over a PA system

- Scenario 3 – smaller event in eastern zone with crowds of 100 people and external terraces occupied:
    (a) Scenario 3a- Event with music (acoustic, jazz, classical)
    (b) Scenario 3b- Event with someone speaking over a PA system

440. The submitted Noise Report has been reviewed by Environmental Health and with the imposition of conditions in respect of activation hours (including hours of use, number of events and noise levels), the proposed use of the activation areas would not have an unacceptable impact upon the amenity of nearby occupiers. In addition to the conditions, a management plan for the quayside would be secured within the S106 agreement.

441. Delivery and servicing are proposed to take place on site over night and outside of peak hours during the day. The delivery and servicing would take place at basement level only, which would be accessed via a vehicle lift. As the delivery and servicing is taking place at basement level, which would be closed off whilst delivery and servicing is taking place, overnight delivery and servicing can be supported as the impact on residential amenity would be limited; it would be secured by condition that delivery and servicing can only take place at basement level and that the noise associated with the vehicle lift is required to be 10db below the background noise level. It is noted that delivery and servicing is only supported overnight due to it being undertaken at basement level and that it would be closed off, and that noise conditions associated with the vehicle lift so that there would not be unacceptable impact on residential amenity.

442. Due to the proposed use as a Hotel, an events management plan would also be secured via the S106 agreement to ensure that the use of the hotel (including any events) would not have an unacceptable impact on the amenity of nearby occupiers.

443. It is acknowledged that an objection has been received from the Rivers Residents Group in respect of impact of the proposed development, particularly the quayside would have an unacceptable impact on residential amenity. Officers consider that due to the aforementioned conditions and planning obligations secured within the S106 agreement, any noise impacts from the proposed development can be appropriately mitigated.

444. Subject to a series of conditions and planning obligations to mitigate noise and vibration during deconstruction and construction and the operational phases of development, the proposed development would comply with policies D13 and D14 of the London Plan, polices DM15.7, CS21 and DM21.3 of the Local Plan and policies S3, HS3 and HL3 of the emerging City Plan 2040.

Sustainability

445. The City of London's 'Planning for Sustainability' Supplementary Planning Document (SPD) was formally adopted on 19th February 2025. The purpose of

the SPD is to provide guidance on how applicants should approach environmental sustainability in their developments through the application process. It has been prepared to provide additional detail and guidance on how to fulfil the policies of the London Plan, adopted Local Plan 2015, as well as emerging policies within the City Plan 2040. The SPD is now a material consideration in determining planning applications, and as such, the proposed development at Custom House, 20 Lower Thames Street & River Wall has been reviewed with the emerging guidance in mind (and in accordance with existing local plan policies relating to sustainability) to ensure the scheme delivers the best outcome possible in terms of sustainability. The scheme is considered to be in general compliance with the actions recommended in the SPD.

Circular Economy

446. London Plan Policy SI7 (‘Reducing waste and supporting the circular economy’) sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 as well as emerging City Plan 2040 Strategic Policy S8 and Policy DE1 set out the City’s support for circular economy principles. In particular, Policy CS15 of the Local Plan 2015 (part 3) sets an overarching strategic policy aim of avoiding demolition through the reuse of existing buildings or their main structures. The policy does not expressly require the avoidance of demolition in all instances and does not set out a process for considering the merits of different approaches to individual sites. Policy DM 17.2 of the Local Plan 2015 seeks new development to be designed to minimise the impact of deconstruction and construction waste on the environment through the reuse of existing structures. In 2023, the City Corporation adopted the Carbon Options Guidance Planning Advice Note, which sets out an optioneering process for considering the carbon impacts of different approaches to development. The emerging City Plan 2040 strategic policy S8 seeks development that takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of development options.

447. To address these policies, the application includes considerations as to the opportunities to retain and refurbish any of the buildings or building elements currently on site. A pre-redevelopment audit, pre-demolition audit and Circular Economy Statement were submitted as part of the planning application.

448. The first iteration of the modern Custom House building was constructed in 1817 and has since undergone a series of substantial works including re-building and refurbishment works, a façade replacement and structural alterations. In its current state, the building is comprised of three wings, each of which feature deep mass concrete underpins at foundation-level, and timber trusses to the roof. The building’s structure is comprised of a mix of load bearing masonry walls, timber joist floors, and iron beams. Most of the East Wing’s

structure dates to the 1960's when it was rebuilt following World War II related damage and features a reinforced concrete frame with columns and walls supporting slabs with beams.

449. In accordance with the CoL's Carbon Options Guidance which requires the exploration of options on a 'case-by-case basis', the refurbishment, alteration and extension of the existing building, including the partial demolition of the east wing, was agreed upon at an early stage as the most appropriate development option, and as such a full optioneering exercise was not considered to be mandatory. Nevertheless, a pre-redevelopment audit involving a qualitative options appraisal was undertaken which highlighted several issues with the building's existing condition. These include the existing MEP services which are outdated and do not meet modern standards, in addition to the building's poor access arrangements, window conditions, and thermal performance, the nature of which prevent the building from meeting building regulation requirements.

450. The pre-redevelopment audit explores the opportunities to address the above issues through an options appraisal, involving a qualitative comparison of the following options:

- Option 1: Light refurbishment, the full retention of the existing building, vital repairs necessary for functionality, and aesthetic improvements through painting and basic maintenance
- Option 2: Light refurbishment and upgrade of building services, a more comprehensive approach to Option 1's improvements, in addition to the introduction of secondary glazing on the windows and MEP plant equipment upgrades
- Option 3: Refurbishment, alteration, and extension of the existing building, including the partial demolition of the East Wing (except façade) and extensive upgrades to the building's fabric and plant
- Option 4: Full demolition and new expansion of the east wing (except façade) with extension and deep retrofit

451. In view of their inability to bring the building up to modern safety, access, and sustainability standards, Options 1 and 2 were considered unfeasible. Whilst Option 4 would address these issues, it was discounted due to the challenges associated with minimising carbon impact, reducing material waste, and preserving the historical significance of the site. Overall, it was considered that Option 3 would demonstrate the lowest feasible upfront carbon impact and deconstruction waste while allowing for the appropriate adaptations and energy efficient upgrades to the building given its heritage constraints. As such, Option 3 has been developed for the application scheme.

452. The submitted Circular Economy Statement for the planning application scheme describes the strategic approach to incorporating circularity principles

and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.

453. The circular economy strategy includes details to support the reuse of existing materials, in addition to identifying an efficient materials strategy for all new elements, to include:

- Retention of 80% of the substructure (by mass), 75% of the superstructure (by mass), and 84% of the façade (by m2)
- The reconfiguration of the internal levels of the east wing which will improve the adaptability of the building to suit future potential changes of use, in addition to its accessibility benefits
- The use of movable furniture and partitions to allow for different configurations based on guest requirements
- The use of steel framing with bolted/screwed connections to enable ease of disassembly
- The specification of durable materials to ensure the longest lifespan of elements can be achieved

454. A pre-demolition audit has been undertaken identifying the types and quantities of key materials present in the existing building whilst exploring on-site and off-site opportunities for reuse and recycling. This includes confirmation of a commitment to achieving key GLA targets including the re-use and recycling of 95% of non-contaminated construction and demolition waste, a minimum of 20% of the building materials to be comprised of reused or recycled content, and a minimum 75% recycling rate for operational waste by 2030.

455. Confirmation of the proposed measures and identified opportunities through an update to the Circular Economy Statement and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by condition.

Operational energy strategy and carbon emissions

456. The Energy Statement accompanying the application demonstrates that the proposed development has been designed to achieve a site-wide overall 33.5% reduction in regulated carbon emissions compared the existing baseline building performance, measured in accordance with GLA Energy Assessment Guidance. 16.7% of this figure would be achieved through Be Lean measures, whilst 16.8% would be achieved through Be Green measures.

457. Energy demand and the risk of overheating would be reduced by including the following key passive and active design measures:

- The introduction of replacement glazing (subject to specialist survey) to the existing timber sash windows

- High efficiency air source heat pumps (ASHPs) to provide heating and cooling to all hotel rooms, food & beverage areas, long room, gym and spa areas
- Centralised domestic hot water storage calorifiers served by water source heat pumps to provide hot water to the proposed development
- Centralised mechanical ventilation, with heat recovery, will provide ventilation throughout the building
- The installation of a photovoltaic (PV) array of 62.5sqm as a renewable energy source
- The installation of energy efficient light fittings and controls

458. A range of solutions have been investigated to further enhance the energy performance of the building, including the exploration of wind power, solar water heating, and biomass which were deemed unsuitable due to space, storage, and operational constraints. Options for expanding the proposed 62.5sqm PV array were explored, but were however, deemed unfeasible due to their potential impact on protected view corridors and the historic fabric of the site. The use of ground source heat pumps has been explored, with further investigations scheduled to take place to ascertain future feasibility.

459. Passive ventilation was considered for all rooms but was not deemed feasible, as the overheating risk assessment concluded that openable windows would not suffice in reducing the risk of overheating, in addition to noise and security related concerns. Additionally, within a mixed-mode ventilation strategy, incorrect use of windows could compromise the operation of mechanical ventilation systems, a risk that would require additional dampers and controls in each guest bedroom that would control the supply/extract whenever a window is opened. This would necessitate the installation of additional services in guest bedroom ceiling voids which would involve intrusive work and would result in lower ceiling heights. As such, the proposed ventilation strategy comprises a mechanical ventilation system in all rooms, other than the Long Room, which would be naturally ventilated. Windows will be fixed shut, but will however, be designed with the option of reversibility to provide flexibility, should circumstances change at a future stage.

460. The site is not located within close proximity to any existing district heat network, with the closest connection being approximately 1km away. However, space has been allocated within the basement plantrooms to allow for future potential connection to a district heat network.

Energy Use Intensity (EUI)

461. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually

including both regulated and unregulated energy, as well as space heating demand.

462. For hotels, the GLA targets an ambitious EUI of 55 kWh/m2(GIA)/year and a space heating demand of 15 kWh/m2(GIA)/year. The estimated EUI from the proposed development is 164.9 kWh/m2(GIA)/year and a space heating demand of 21.8 kWh/m2(GIA)/year. These figures' exceedance of the GLA energy guidance can be attributed to the building's listed status which presents several limitations to the improvement of the existing envelope's thermal performance, in addition to high lighting consumption related to the existing façade's poor daylight performance. Furthermore, a high percentage of the EUI is associated with unregulated loads including the spa, with limited information regarding its operational management and no industry benchmarks for this type of space usage.

463. The site-wide energy strategy does not meet the London Plan target of 35% carbon emission savings set out in the London Plan. However, in view of the constraints associated with the building's Grade I listing, which significantly limits the extent of structural and fabric upgrades, it is considered that opportunities to reduce on-site carbon emissions have been sufficiently explored.

464. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with the GLA's zero carbon target in the London Plan.

BREEAM

465. The proposed development is targeting a minimum BREEAM rating of 'Excellent' under BREEAM Assessment for Refurbishment and Fit-Out (RFO) and New Construction (NC).

466. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution and Materials as well as the Climate Adaptation credit Wst05 in the Waste category.

467. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and emerging City Plan 2040 Policies DE1 and CV4. Post construction BREEAM assessments are required by condition.

Whole life-cycle carbon emissions

468. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's zero net-carbon city target.

469. Although the emerging City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses paragraph 161 of the NPPF 2024 which states that the planning system should support the transition to net zero by 2050, and paragraph 164 which states that new development should be planned for in ways that help reduce greenhouse gas emissions. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme including maximising retention of existing structure.

470. The application proposal: The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below. The GLA does not currently provide Whole-Life-Cycle Carbon benchmarks specific to hotel spaces and as such the scheme has been assessed in relation to the requirements for residential developments which constitutes the most similar profile. The results show that the B – C (excluding B6 and B7) emissions and A – C (excluding B6 and B7) would meet the GLA standard benchmarks, whilst the A1 - A5 emissions would outperform the GLA aspirational benchmark.

471. The table below shows whole life-cycle carbon emissions per square meter (RICS v1 calculation methodology) in relation to the GLA benchmarks (embodied carbon without carbonisation applied) at planning application stage:

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		

472. These figures would result in overall whole life-cycle carbon emissions of 19,397,298 kgCO2e being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 6,844,922kgCO2e (35.3% of the building's whole life-cycle), and the embodied carbon emissions for 12,552,376kgCO2e (64.7% of the building's whole life-cycle carbon). Building services and works to the substructure constitute the greatest contributors to embodied carbon, with significant emissions also arising from concrete, elevators and pipework.

473. The scheme's low upfront carbon figure is largely driven by the high levels of retained structure, the nature of which of which prevents the need for substantial new build elements. In addition to the high levels of retention, several other measures to reduce carbon impact will be explored as the design progresses. These include the prioritising of supply from manufacturers with EPDs, the minimisation of loads at roof level and the use of lightweight materials to prevent the need for further strengthening, the prioritisation of local or reused materials for finishes, and the procurement of low carbon transport methods where possible.

474. A detailed whole life-cycle carbon assessment confirming improvements that can be achieved through the detailed design stage, in particular those that have been identified in the application documents, and a confirmation of the post-construction results are required by conditions.

475. The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's whole life-cycle carbon assessment guidance, as confirmed by independent 3rd party review. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic policy CS15 Sustainable Development and Climate Change and the emerging City Plan 2040 policy DE1 Sustainable Design. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to net zero by 2050 in accordance with paragraph 161 of the NPPF (2024).

Urban Greening

476. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of development designs. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Local Plan Policy CS19 and Emerging City Plan 2040 policy OS2 (City Greening) mirror these requirements and requires the highest levels of greening in line with good design and site context.

477. The proposed landscaping on site is constrained by the need to provide the quayside as a usable and walkable environment, with this element of the proposal being considered a significant public benefit in itself. This is in addition to the wider constraints across the site, such as the low potential for landscaping improvements on Lower Thames Street and Water Lane. Key enhancements include at-grade planters across the southern elevation of the building, which facilitate the drainage strategy for the site and include integrated seating to allow for greater flexibility of use and to provide valuable resting points at this part of the quayside, smaller scale planters at the central portion of Custom House along Lower Thames Street as achieved through the removal of railings installed in the 20th century, and linear vertical planting proposed on Old Billingsgate Walk and directly adjacent to the existing building. Additionally, an internal lightwell within the West Wing of the building would feature central planting.

478. Importantly the proposals retain all existing mature plane trees along the southern boundary of the site, and the existing trees on Water Lane. In consideration of the substantial constraints facing the site, including the need to maintain the heritage value of the Grade I listed building, alongside the need to maintain a usable and walkable quayside which also provides resting points and delivers accessibility improvements to the main building, the landscaping proposals are considered acceptable, and in accordance with Paragraph 136

of the NPPF, as well as policy aspirations for the Pool of London Key Area of Change and the Thames Policy Area.

479. With regards to the Urban Greening Factor, the proposal achieves a 0.18 UGF score against a target of 0.3 for non-residential development. When calculated using a site area measured without including the existing building, the proposals achieve a UGF score of 0.35. In light of the constraints facing the site as listed above, this is considered acceptable.

Biodiversity

480. Policy OS4 of the emerging City Plan 2040 sets out biodiversity net gain (BNG) requirements for major developments. Due to the City's highly urban nature, the statutory 10% BNG is not an appropriate mechanism for delivering meaningful biodiversity improvements in the Square Mile. Instead, the City Plan sets a minimum target of three biodiversity units per hectare (3BU/ha). As referenced in paragraphs 89 and 91 of this report, Policies CS9 (iv) and S17(4) look to improve opportunities for biodiversity along the Thames Foreshore and ask that development has no adverse effect on the River Thames and on the Tidal Tributaries Site of Metropolitan Improvement for Nature Conservation (SMINC).

481. The application has been submitted with an Ecological Impact Assessment and an Arboricultural Impact Assessment. These documents set out that the proposal would not trigger the national requirement for Biodiversity Net Gain as the proposals would have no impact on any priority habitat and the biodiversity value of the site as-existing would not be impacted by the proposed development. The majority of the site is taken up by Custom House and its surrounding hardstanding areas of either road or hardstanding for car parking. This is excepting the mature plane trees along the southern boundary of the site, and existing trees at the northern end of Water Lane. Conditions would be attached which would require the submission of further arboricultural information following the gathering of more information as the development began, alongside detailed information as to the protection of all trees on site during construction. The proposals deliver 0.04 biodiversity units which is approximately 0.048 units per hectare. Given the need to maintain the quayside as a working floodplain, to provide accessibility improvements to the site, and to preserve the heritage value of the Grade I listed building, and as landscaping improvements delivering biodiversity gain have been proposed where possible, this is considered acceptable.

482. With regards to wider impacts, including those on the River Thames and the SMINC, the submitted Ecological Impacts Assessment concludes that the development in occupation is unlikely to have any significant impact on any site of ecological important, and those potential impacts during construction can

controlled through a Scheme of Protective Works and Construction Logistic Plans conditions; and these conditions attached.

483. It is proposed to retain and protect all trees on site and, and given the ecological impacts and mitigation as set out in the submitted Ecological Impacts assessment, the proposed impact on biodiversity is considered acceptable. This is also in light of the opportunities to include greening and biodiversity measures on site which have been taken up within the proposal, as constrained in ways summarised in the section of this report concerning urban greening.

Climate Resilience

Overheating

484. To address urban heat island risks, the proposed development includes an approach designed around passive measures and limiting internal heat gains to minimise the need for cooling. This includes exploring the use of external shading along the South façade which would both reduce energy demand and improve occupant comfort, in addition to the provision of active cooling through central air handling units. Thermal comfort studies in line with CIBSE TM52 have been carried out for the scheme to ensure the risk of overheating is optimised.

Flooding

485. The site is located within Flood Zone 3 and is therefore considered to be at a high risk of fluvial and coastal flooding. A range of flood resilience measures have been proposed including flood defence wall and basement flood gate improvements, and the management of surface water through basement rainwater harvesting tanks and overland flow into the River Thames.

Water Stress

486. The development aims to achieve at least the BREEAM Excellent standard for the 'Wat 01' water category and reduce potable water consumption by 40% over the BREEAM baseline via water efficient sanitary fittings. Proposed measures include the use of water leak detection systems to minimise water wastage due to leaks, the metering and monitoring of water uses during building operation, and the design of greywater and rainwater harvesting systems in accordance with BREEAM requirements.

Sustainability Conclusion

487. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process

relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

488. The proposed development would deliver a high quality, energy efficient development that is on track to achieve an “excellent” BREEAM assessment rating, in overall compliance with London Plan policy SI 2, Local Plan policy CS15 and DM 15.5 as well as Draft City Plan 2040 policies DE1 and CV4. The proposals cannot meet the London Plan policy SI2 target of 35% operational carbon emission savings compared to a Part L 2021 compliant scheme which is reflective of the constraints associated with the building’s Grade I listing, which significantly limits the extent of structural and fabric upgrades. However, the scheme demonstrates the implementation of various measures to reduce operational energy demand and benefits from future capacity to connect to a district heating network upon expansion in the future. Once the building connects to a district heat network, it is expected that further reductions in operational energy demand will occur over time in accordance with the anticipated decarbonisation of the heat network.

489. By prioritising high levels of retention across the substructure (80%), superstructure (75%) and façade (84%), and by identifying opportunities for the reuse of deconstruction materials, the scheme significantly minimises the need for additional materials and associated construction processes, and in doing so, outperforms the GLA's aspirational benchmark for upfront emissions (modules A1 - A5). The proposal would therefore satisfy the GLA’s circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2040 policy CE1. The building design responds well to climate change resilience by addressing the risks of overheating, flooding, and ensuring the saving water and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Page 97 Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and Draft City Plan 2040 polices S14, OS1, OS2, OS3, S15, CR1, CR3.

Land Contamination

490. Local Plan policy DM15.8 and draft Policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

491. There would be some excavation required to facilitate elements of the proposal such as the foundation to the stairs and terrace and vehicle lift. The City's Environmental Health Officers have reviewed the application and requested a condition that, in the event that land contamination is discovered during the works, requires the submission of an investigation and risk assessment, remediation scheme and verification report.

492. Thus, overall, subject to condition the proposals are in accordance with Policy DM15.8 of the Local Plan and Policies S1 and HL4 of the emerging City Plan.

Security

493. London Plan Policy D11 ('Safey, security and resilience to emergency') states that development should include measures to design out crime that – in proportion to risk- deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

494. Local Plan Policy CS3 (Security and Safety) seeks to ensure that the City is secure from crime, disorder and terrorism. Local Plan Policy DM3.2 (Security measures in the new developments and around existing buildings) seeks to ensure that new development in connection with the City of London Police. Policy DM3.3 (Crowded Places) requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.

495. Strategic Policy S2 of the emerging City Plan 2040 sets out how the City would work with the City of London Police, the National Protective Security Authority (NPSA) and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, by ensuring that development proposals design out crime, encourage a mix of uses and natural surveillance of streets and spaces.

496. The applicant has provided a Security Statement at Section 13.1 of the Design and Access Statement which has been informed by a Security Needs Assessment (SNA) undertaken in engagement with the City of London Police.

497. A Crime Prevention Through Environmental Design (CPTED) approach will be used for all publicly accessible areas. Electronic access control at points of entry and transition would be installed to permit/deny authorised access. Should it be required, on an event-by-event basis, security overlay will be incorporated into the entrance to hotel events spaces.

498. All planned publicly accessible internal spaces are to be supported by combination of natural surveillance, internal and external CCTV coverage and will be managed by the hotel for public security and safety. External lighting in the publicly accessible areas will be adequate to support CCTV and natural surveillance. All building mounted security equipment would be colour coordinated and sympathetic to the building façades.

499. Fenestration and glazing will be subject to detailed glazing survey and feasibility review for incorporation of palliative measures and incorporation of recommendations in accordance with a Hazard Mitigation approach as described in guidance by British Council of Offices Security Guide (2009) and National Protective Security Authority (NPSA) to reduce hazards from flying glass fragments.

500. Hostile Vehicle Mitigation (HVM) is currently proposed at the public realm to the south of the building through integration with vehicle security barriers to the potential vehicle entry points, located at Water Lane and behind the existing gate at Old Billingsgate Walk. The City of London Police have advised that a full HVM review for the whole site is required including a Counter Terrorism Risk Assessment and Vehicle Dynamics Assessment. HVM would be required to be integrated within the design. Full details of the HVM and associated risk assessments would be secured by condition.

501. The City of London Police have been consulted on this planning application and have provided a number of comments and advice to the applicant. The full details of the security measures would be secured by condition and within various management plans within the S106 agreement, which would be assessed in consultation with the City of London Police.

502. Subject to the imposition of conditions and S106 obligations, the proposed development is considered to be in accordance with London Plan Policy D11, Local Plan Policies CS3, DM3.2, DM3.3 and DM3.5 and emerging City Plan 2040 Policy S2.

Suicide Prevention

503. Policy DM3.2 ‘Security measures in new development and around existing buildings’ aims to ensure that appropriate measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm.

504. Policy DE4 ‘Terraces and Elevated Public Space’ of the emerging Local Plan 2040 advises that appropriate safety measures should be included in high rise buildings to prevent people from jumping or falling.

505. The City of London Corporation has also approved a guidance note “Preventing Suicide from High Rise Buildings and Structures” (2022) which advises

developments to ensure the risk of suicide is minimized through appropriate design features. The advice note states that buildings of 4 storeys or higher with roof access, balconies or ledges at a height of 10 metres or more, present sites of increased suicide potential, along with multi-storey carparks and internal atria.

506. Custom House stands at four storeys at its maximum and there are no high-level terraces or accessible spaces proposed. The roof level is only accessible for maintenance. There would be terraces at first floor and ground floor levels which would mean that the guidance in the advice note is not applicable. Notwithstanding this, a balustrade with a height of 1.1m is proposed, which has been informed by the design impact on the Grade I Listed Building and in accordance with building regulations.

507. Thus, it is considered that the proposed development is acceptable in terms of suicide prevention and the proposals would comply with Policy DM3.2 of the Local Plan 2015 and Policy DE4 of the emerging City Plan 2040.

Fire Statement

508. A Fire Statement has been submitted outlining the fire safety strategy for the building which has been reviewed by the City District Surveyor's Office. The statement adequately covers the relevant fire aspects of the design and is in accordance with Policies D5 and D12 of the London Plan.

509. Thus, the Fire Statement is considered acceptable for the planning stage and is secured by condition.

Health Impact Assessment

510. Policy HL9 of the emerging City Plan 2040 requires major development to submit a Healthy Impact Assessment (HIA) to assess potential health impacts resulting from proposed developments.

511. Policy GG3D of the London Plan states that "to improve Londoners' health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help to reduce health inequalities, for example through the use of Health Impact Assessments".

512. The application is accompanied by a Health Impact Assessment (HIA) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health effect.

513. The HIA has been based on the London Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on wider determinants of health. The HIA concludes that the development overall has a beneficial impact on health and wellbeing for people on-Site and in the surrounding area. Beneficial effects include: creation of new temporary and permanent jobs; providing free floorspace available to local community or cultural groups; creation of new publicly accessible open space; provision of high quality inclusive and accessible hotel accommodation.

514. The HIA identifies that the transport and vehicular movements associated with the proposed development may result in adverse impacts on surrounding residents in terms of noise and dust.

515. These benefits would be secured, and potential impacts would be mitigated as so far as possible, by the requirements of relevant conditions and obligations within the S106 agreement.

516. Overall, it is considered that the development seeks to improve the health and address inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan Policy GG3 and emerging City Plan Policy HL9.

Assessment of Public Benefits and Paragraph 215 NPPF balancing exercise

517. Under sections 16 and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission or listed building consent for development which affects a listed building or its setting the Corporation shall have special regard to the desirability of preserving the building/s or its/their settings or any features of special architectural or historic interest which they possess.

518. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied any harm is clearly and convincingly justified (NPPF paragraphs 212 and 213).

519. The proposal would result in low and moderate levels of less than substantial harm to the grade I listed Custom House, principally through the insertion of new risers, bathrooms and lift cores needed in order to deliver the new hotel use, with some additional external works, as explained earlier in this report. The proposal would result in a low level of less than substantial harm to the grade II* listed River Wall, Cranes and Steps. Whilst in each instance the harms are considered to be clearly and convincingly justified and minimised through good design, these instances of harm nevertheless remain.

520. Given that the proposal would result in less than substantial harm, there is a strong presumption against the grant of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits. Paragraph 215 of the NPPF, which states *'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use'.*

521. Within the statutory process and under NPPF policy the decision-maker must adopt a sensible approach to assessing likely harm to the significance of a designated heritage asset and weighing that harm against the benefits. The decision maker does not have to go about balancing harm against benefits in a particular way.

522. The National Planning Practice Guidance states that "public benefits…could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits".

523. The key economic, environmental and social benefits of the proposal are considered to be as follows:

Economic:

- The provision of a 179-room hotel and complementary uses would attract visitors, increased tourism and spend in the City.
- The provision of 200 full-time equivalent and 80 part-time jobs on site, supporting diversity of use, vitality and growth within the City, and its resulting increase in spending in the locality which would boost local businesses and support post-COVID resurgence, in addition to those jobs created during the renovation and construction period with similar, albeit temporary, impacts.
- The provision of the publicly accessible quayside which would transform this stretch of the riverside, by making it more attractive and enticing for people to visit, stop and dwell, this would drive footfall and increase spending across the City.
- The multi-faceted cultural offer and activation within the quayside would drive footfall during the day, evenings and weekends and the high-quality amenities provided by the proposed development as well as provide amenity space for wellbeing of workers, residents and visitors.
- CIL contributions generated, as specified in the relevant section below, and other s106 contributions including financial contributions related to employment and training, and affordable housing.

524. Collectively, given their nature and extent, the aforementioned benefits are attributed substantial weight.

Environmental:

- The retention and upgrade of the existing building to meet contemporary sustainability and energy efficiency aspirations, including operational carbon savings of 32.2%, an aim to meet BREEAM 'Excellent' rating, and seeking reductions in waste and use of resources through the adoption of circular economy principles.
- At ground floor level on the riverside, the proposal would result in significant enhancement through the creation of the publicly accessible quayside which would interconnect with the River Walk, which is to be secured as City Walkway, delivering enhanced permeability for pedestrians and providing an attractive public space. This space would support active and cultural uses (within the activation areas) which will enhance the vitality, vibrancy and distinctiveness of the site and heritage appreciation all of which align with Destination City aspirations.
- Provision of a car-free development, alongside the provision of long-stay and short-stay cycle parking, and end of trip facilities, enabling and promoting active travel.
- The proposal would incorporate a greening uplift at ground floor level on the site.
- The flood barriers would be improved to the 2100 levels, securing long term flood safety for the building.
- The dramatic improvement and restoration of the quayside, revealing and rehabilitating the critical contribution the river makes to the setting and significance of Custom House.
- The amplification and revealing of the group value between Custom House and the listed Cranes, Steps, River Wall and Quayside.
- The restoration of historic circulation through the building, reinstating original doors on to the riverfront, consistent with the earliest phase of building works.
- The restoration of decorative detail to key interior spaces such as the Long Room and Kings Warehouse, reopening blocked entrances and windows and removing late twentieth century clutter and service ducts.

525. Collectively, these are attributed a substantial level of weight.

Social:

- The proposed quayside would deliver new social spaces at ground floor level in an area with limited external public realm for workers, visitors and residents, this would provide opportunities for socialising, relaxation and leisure and provide new views of the Grade I listed building.

- The provision of new historic interpretation and equitable access into a rare Georgian survival on the riverfront, enabling a tangible appreciation of London
- The proposals would provide a multifaceted cultural offer that would provide public access to a previously restricted government building which is Grade I listed.
- Public access to the historic spaces for the first time in decades, including areas of most significant heritage value such as the Long Room and Tidewaiters' Room.
- The proposals would provide free access to a reference library within the Tidewaiters Room and an Engagement Space for use by schools, community groups and cultural organisations
- The proposal would secure S106 obligations for £74,150 (including monitoring) towards affordable housing provision and £44,490 (including monitoring) towards local training, skills and job brokerage.

526. Collectively, these are attributed a moderate level of weight.

527. In carrying out the paragraph 215 NPPF balancing exercise, considerable importance must be given to the desirability of preserving listed buildings and their settings, great weight is attached to the significance of these assets of national importance. The proposals would result in low and moderate levels of less than substantial harm to Custom House and the River Wall, Cranes and Steps. In assessing the weight to be given to that harm in the balancing exercise the extent of the harm assessed (low and moderate levels of less than substantial harm) and heritage value of asset in question (high as Grade I listed building) must be taken into account. Great weight must be given to the conservation of all designated heritage assets including Custom House.

528. It is the view of officers that the collective package of the public benefits secured would, giving great weight to the heritage harm, outweigh the heritage harm identified. On the basis there is clear and convincing justification to the harm, and presumption against granting planning permission is rebutted, the outcome of the paragraph 215 NPPF heritage balance falls in favour of the scheme.

Planning Obligations and Community Infrastructure Levy

529. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

530. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

531. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy Regulations 2010 (as amended).

532. CIL contributions and City of London planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	**Contribution (excl. indexation)**	**Forwarded to the Mayor**	**City's charge for administration and monitoring**
MCIL2 payable	£2,766,860	£2,656,185	£110,674

City CIL

Liability in accordance with the City of London's policies	**Contribution (excl. indexation)**	**Available for allocation**	**Retained for administration and monitoring**
City CIL	£1,595,775	£1,515,986	£79,789

S106 Planning Obligations

City Planning Obligations			
Affordable Housing	£74,150	£73,409	£741
Local, Training, Skills and Job Brokerage	£44,490	£44,045	£445
Carbon Offset Contribution (*as designed*) *Not indexed*	£1,184,935	£1,184,935	£0
S106 Monitoring Charge	£4,750	£0	£4,750
Total liability in accordance with the City of London's policies	**£1,308,325**	**£1,302,389**	**£5,936**

533. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021 or are necessary for site specific reasons. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations

  (Highways Schedule of Condition Survey due prior to First Preparatory Operations, site access, consents, licences etc)

- Local Procurement Strategy (due prior to Commencement)
- Local Training, Skills and Job Brokerage Strategy (*Demolition Strategy* due prior to Commencement / *Construction Strategy* due prior to Implementation / *End Use Strategy* due prior to Completion)
- 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
    - A maximum of 28 deliveries per day, or 196 deliveries per week, whichever shall be fewer
- Service Vehicle Lift Maintenance and Management Strategy
- Travel Plan (including Cycling Promotion Plan)
- Accessible Car Park Management Plan (ACPMP) *including details of how the accessible parking spaces will be managed to accommodate the users and their requirements.*
- Construction Monitoring Costs
    - £30,935 - *First Year sum due upon Commencement*
    - £25,760 - *Subsequent Annual sums due upon each anniversary of Commencement until Practical Completion*

- Carbon Offsetting (*As Built Assessment due following Completion but prior to Occupation*)
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Cycle Infrastructure Contribution (TfL) - *£10,800 Indexed for 9 Sheffield Stands/18 Parking Spaces due upon Implementation.*
- Section 278 Agreement (with *Transport for London)*

  Scope of the TfL Section 278 works will include reinstatement of areas following construction, as well as any changes to the public highway required to accommodate the new site layout (including, but not limited to):

  Lower Thames Street

  - Reconstruction of the footways adjacent to the application site

  - Construction of the pick-up and drop-off layby and associated drainage

  - Resurfacing of the carriageway fronting the site

  - Provision of road markings

  - Improvements to the existing controlled crossing and associated traffic signals work
- Provision of Public Route between Lower Thames Street and the Quay (*Specifications, Management Plan and Public Access - every day from in line with restaurant opening hours except for Christmas Day, Boxing Day and New Year's Day*)
- Public Realm Space (*Events Management Plan, Quayside and within hotel, and Public Access - 24/7 and limit on access for emergency vehicles and maintenance machinery etc*)
- City Walkway (*Dedication, Specification, Works and Public Access - 24/7*)
- Architect Retention (*Lead Architect: Orms - and Conservation Architect: Richard Griffiths Architects*)
- Cultural Spaces - The Engagement Space, The Gallery, The Café, The Tide Waiters Room and The Long Room (*Specification for the cultural spaces including matters such details of display cabinets (which are to be designed to museum standards), exhibition lighting etc., Public Access including tours and availability for booking by schools, community groups, charities, cultural organisations and research and educational institutions*)
- Cultural Implementation Strategy to include the following provisions:

- Establishment of Culture and Community Committee
- Appointment of a Culture and Community Events Officer
- Appointment of a Curator
- Management of the Cultural Spaces

Monitoring and Administrative Costs

534. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

535. The applicant will pay the City of London's legal costs and the City Planning Obligations Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Public Sector Equalities Duty

536. The City, as a public authority, must in exercise of its function, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

537. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. Matters relating to accessibility and inclusivity are addressed in detail in the relevant section of this report. These are an important part of ensuring that the development will advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not. It is the view of officers that a decision to grant planning permission in this case would reduce barriers to access for disabled people through *inter alia* the provision of step free access compared to the existing arrangement, and through the provision of two blue badge parking spaces at street level. Officers also consider the improvements in accessibility to the site, its internal historic spaces, and the opportunities provided by the public route through the centre of the building, in addition to day-pass provision for academics/students to use the Tide Waiter's room, each advance equality of opportunity for a number of groups sharing protected characteristics.

Human Rights Act 1998

538. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention Right (being rights set out in the European Convention on Human Rights ("ECHR")).

539. Insofar as the grant of planning permission would result in interference with right to private and family life (Article 8 of the ECHR), particularly regarding residential amenity of neighbouring properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme, and therefore necessary in the interests of the economic well-being of the country. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential properties considering the proposed conditions and planning obligations. As such, the extent of harm is not considered to be unacceptable and does not cause proposals to conflict with Local Plan policies or emerging City Plan policies as references in the relevant sections of this report.

Conclusion and Overall Planning Balance

540. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the emerging City Plan 2040 and considering all other material considerations.

541. The application(s) relate to the Custom House, which is Grade I listed building and seek the change of use of the existing office building (Use Class (E (g) (i)) to hotel led mixed use scheme (Use Class C1), with the provision of a basement spa and health centre (Use Class E (d)) and ground floor food and beverage, public north/south route, gallery and event spaces (Use Class Sui Generis). As discussed throughout this report, a series of alterations are proposed to the Grade I listed building and the wider site to facilitate the change of use.

542. No objections have been received from statutory consultees. Across the two rounds of public consultation, a total of two objection have been received. The grounds of objection include the proposed used not being in keeping with the historical use of the building and the impacts of amenity from the proposals for the quayside. Any requisite mitigation would be secured by condition or S106 obligation.

543. The proposal would result in the loss of existing office floorspace. The Applicant has justified the loss of office floorspace at the site by the submission of a Financial Viability Assessment, which was independently reviewed. It is considered that the loss of office floorspace, and the proposed hotel use, in this

location would not compromise the primary business function of the City. Hotels are supported as a strategic function of the CAZ, and the London Plan states that 58,000 rooms for serviced accommodation will be required in London by 2041. The need for visitor accommodation is also reinforced in the CoL Visitor Accommodation Sector Commercial Needs Study. It is therefore considered that the hotel would contribute to the balance and mix of uses in the area and would offer complimentary facilities to be accessed by the public. The proposal would be in accordance with Local Plan policies CS1, DM1.1 CS11 and DM11.3, policies S4, OF2, S6 and CV4 of the emerging City Plan, and policies SD4 and E10 of the London Plan.

544. The proposed development, in addition to the hotel use would provide complimentary uses including food and beverage uses at ground floor level and a basement spa and health centre. These uses are considered to be appropriate within a hotel-led mixed used development which would be available to the general public. These uses are also considered to improve the vibrancy along the riverside as required by policy.

545. The proposals would replace the existing car park with a newly created public realm area on the quayside, that would interconnect with the Thames Path (to be secured as City Walkway) to create a continuous public space and provide unfettered public access 24 hours, 7 days a week, 365 days a year, meeting policy objectives of improving access to the river and riverside walk, providing a new public space along the riverfront and also improving the vibrancy of the riverside. The proposal would be in accordance with CS9, CS19, and DM19.1 of the Local Plan and policies S14, S17, S19 and OS1 of the emerging City Plan 2040.

546. A multi-faceted cultural offer is proposed, which would be managed by the hotel operator and partner, would provide access to an important Grade I listed building, the previous governmental use of which was high-security and restrictive in nature. In addition, activation areas are proposed to the east and west of the newly created publicly accessible quayside, which have the ability to host small scale performances, small scale music performances and market stalls, which would also contribute to the vibrancy and activation of the riverside. The proposal would be in accordance with policies CS9, CS11 and DM11.1 of the Local Plan and polices S17, S19 and OV2 of the emerging City Plan 2040.

547. The proposals have been fundamentally shaped by the significance of Custom House as a key site of exchange, rare Georgian survival and palatial neo-classical structure in a prominent riverside location. An assessment of the proposals has identified several instances of less than substantial harm through the conversion to hotel, specifically where the creation of bathrooms, risers and adequate circulation to deliver the hotel use diminishes the overall intact quality

of the interiors. However, in every instance these are considered to have been minimised and justified. Officers have balanced this harm against the heritage and public benefits of the scheme which include the restoration of historic circulation and details within the principle spaces, removal of later twentieth century partitions and duct work as well as most critically, the dramatic improvement to the quayside, restoring an open character, sympathetic palette of materials and expanding the publicly accessible space on this important piece of river frontage. The works would significantly improve the contribution of setting to the significance of both Custom House and the listed steps, cranes and quayside, improving the group value of both. When considered all together, the works are found to be acceptable, giving considerable importance and weight to the heritage benefits and harms respectively. It is important to note the proposals include significant improvements to the accessibility across the site, which at present is very limited, particularly during flood events. The proposals will create a new accessible riverside café and engaging high quality public space, connecting this large stretch of river frontage to important north bank route between Old Billingsgate Market and the Tower of London. As part of the proposals, public access to the interior spaces would be secured including the use of the Long Room, food and beverage offers in the Kings Warehouse as well as a series of bookable engagement and gallery spaces. As such the proposals are considered to deliver on key policies around the activation and improvement along the river front and celebration of the City's heritage.

548. The proposal would be transformative through the delivery of the quayside that would have unfettered public access, 24 hours a day, 7 days a week, 365 days a year, transforming a currently underutilised site with little active ground floor uses and no publicly accessible public realm into a new destination within the Pool of London Key Area of Change and Thames Policy Area.

549. The proposed development would represent a highly accessible and inclusive building, providing 10% wheelchair accessible rooms and improved step free access into the building compared of the existing situation, the full details being secured by condition and S106 obligation to ensure they are delivered. The proposed development would comply with policy D5 and E10 of the London Plan, policy DM10.8 of the Local Plan and policy HL1 of emerging City Plan.

550. Due to the nature of the proposed development, there would not be an impact in environmental terms in respect of daylight, sunlight and overshadowing, microclimate and thermal comfort. Subject to the imposition of conditions and S106 obligations the proposed development would have an acceptable on residential amenity, in particular the closest residential accommodation at Sugar Quay.

551. In transportation terms, the proposals would align with the aspirations set out in the City's Transport Strategy. In respect of delivery and servicing this would

take place on site at basement level which would be accessed via a vehicle lift. A cap on vehicle numbers and restrictions in respect of servicing hours would also be secured as part of this application. In respect of drop off and pick up activity associated with the hotel use, S278 works on Lower Thames Street would secure the construction of a pick-up and drop off lay by. In respect of cycle parking long-stay and some short stay cycle parking would be provided on site and a contribution towards cycle infrastructure would be secured due to the shortfall in short-stay cycle spaces. The proposals would accord with policies T1, T2, T4, T5 and T6 of the London Plan, policies DM16.1, DM16.2, DM16.3, DM16.4, DM16.5 and DM3.2 of the Local Plan and policies AT1, AT2, AT3, VT1, VT2, and VT3 of emerging City Plan 2040.

552. The proposed development would deliver a high quality, energy efficient development that is on track to achieve an 'excellent' BREEAM assessment rating, demonstrating how even grade I listed historic buildings are capable of adaptation to be more sustainable, though officers do acknowledge that the development cannot meet the London Plan target of 35% operational carbon emissions savings compared to a Part L 2021 complaint scheme, as a result of constraints associated with the building's Grade I listing, which significantly limits the extent of structural and fabric upgrades. However, the scheme demonstrates the implementation of various measures to reduce operational energy demand and benefits from future capacity to connect to a district heating network upon expansion in the future. Officers do acknowledge that the scheme would fall below the policy UGF score, this is due to constraints associated with maintaining the heritage value of the Grade I listed building, and the need to provide a usable and walkable quayside.

553. The application site is within flood zone 3 and the proposed development would incorporate flood resilience measures. These include the raising the front flood wall to the year 2100 levels and the removal of the existing vehicle ramp. The proposed hotel use would be provided with access and egress onto Lower Thames Street in the event of a breach of the flood defences. The Environment Agency raise no objections to the proposals subject to the imposition of conditions.

554. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assesses all the policies and proposals in the plan and to come to a view as to whether in light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise. Notwithstanding conflict with policies CS12 (1), DM12.1 and DM12.3 of the Local Plan, policies S11 and HE1 of the emerging City Plan 2040 and policy HC1 of the London Plan, due to the heritage harm identified and conflict with policies CS19 of the Local Plan, OS2 of the emerging City Plan and G5 of the London Plan due to

not meeting the target UGF score, it is the view of officers that it is a matter of planning judgement that the proposals comply with the development plan when considered as a whole.

555. The scheme would provide benefits through CIL improvements and through planning obligations such as local training skills and job brokerage, housing and other local facilities and measures. The payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition, there would be site specific measures secured by condition and within the S106 agreement.

556. Paragraph 11 of the NPPF sets out that there is a presumption in favour of sustainable development. For decision makers that means approving development proposals that accord with an up-to-date development plan without delay.

557. As set out in paragraph 215 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). In addition, other material considerations, including the application of policies on the NPPF, in particular the outcome of the paragraph 215 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth, also indicate that planning permission should be granted.

558. It is the view of Officers that as the proposal complies with the Development Plan when considered as whole. Taking into account all material planning considerations which also weigh in favour of the scheme, it is recommended that planning permission be granted as set out in the recommendations and the schedules attached. Officers also consider that the application for listed building consent should be granted.

Background Papers

Application Documents

Received 21st February 2025

- Completed Application Form, prepared by Montagu Evans
- CIL Form, prepared by Montagu Evans
- Cover Letter, prepared by Montagu Evans
- Existing Location Plan prepared by Orms
- Existing Drawings prepared by Orms
- Existing Public Realm and Landscape prepared by Publica
- Custom House – Market Commentary, prepared by Savills dated November 2024

- Statement of Community Involvement, prepared by Concilio dated February 2025
- Circular Economy Statement Rev 4.0, prepared by NDY dated February 2025
- Report on an Archaeological Evaluation Issue 3, prepared by MOLA dated January 2025
- Flood Evacuation Plan Rev P06, prepared by Elliot Wood dated February 2025
- Workplace Travel Plan, prepared by Caneparo Associates dated February 2025
- Draft Operational Management Plan, prepared by Caneparo Associates dated February 2025
- Cycle Promotion Plan, prepared by Caneparo Associates dated February 2025
- River Wall Penetrations Rev P02, prepared by Elliot Wood dated January 2025
- Ventilation and Extraction Rev 1.0, prepared by NDY dated January 2025
- Ecological Impact Assessment Rev B, prepared by Tyler Grange dated February 2025
- Outline Construction Management Plan Rev 02, prepared by Real PM dated February 2025
- Financial Viability Assessment, prepared by Montagu Evans dated February 2025
- Condition Survey and Gazetteer, prepared by Richard Griffiths Architects dated February 2025
- Flood Risk Assessment Rev P06, prepared by Elliot Wood dated February 2025
- Sustainable Drainage Strategy Rev P05, prepared by Elliot Wood dated February 2025
- Basement Justification Report, prepared by Orms dated January 2025
- Cultural Strategy, prepared by Publica dated February 2025
- Health Impact Assessment, prepared by Montagu Evans dated February 2025
- Quayside Activation Management Plan, dated February 2025
- (Built) Heritage, Townscape and Visual Impact Assessment, prepared by Montagu Evans dated February 2025
- External Lighting Strategy, prepared by Atelier Ren dated February 2025
- Building Services Rev 4.0, prepared by NDY dated January 2025
- Archaeological Desk-Based Assessment, prepared by Mills Whipp Projects dated February 2025
- Delivery, Servicing, and Waste Management Plan, prepared by Caneparo Associates dated February 2025
- Energy Strategy Rev 3.0, prepared by NDY dated January 2025
- Fire Statement, prepared by NDY dated January 2025
- Heritage Assessment 6, prepared by Mills Whipp Projects dated February 2025
- Outline Construction Logistics Plan, prepared by Caneparo Associates dated February 2025
- Sustainability Statement Rev 4.0, prepared by NDY dated February 2025
- Whole Life Carbon Assessment Rev 3.0, prepared by NDY dated February 2025
- Planning Noise Report Rev D, prepare by Sandy Brown dated February 2025
- Planning Statement, prepared by Montagu Evans dated February 2025

- Transport Assessment, prepared by Caneparo Associates dated February 2025

Received 25th February 2025

- Design and Access Statement (including Security Statement) Rev C01, prepared by Orms dated January 2025

Received 3rd March 2025

- Structural Report Rev P021, prepared by Elliot Wood dated December 2024

Received 22nd July 2025

- East Wing Roof Study, prepared Orms dated April 2025

Received 29th July 2025

- 3rd Party Financial Viability Review, prepared by Avison Young dated June 2025
- Custom House- CoL and TfL Transport Response Note, prepared by Caneparo Associates dated July 2025

Internal Consultations

- Memo, City Operations Division, 03 April 2025
- Memo, District Surveyors Office, 09 April 2025
- Memo, Environmental Health Officer, 16 April 2025
- Memo, City Gardens, 17 April 2025
- Letter, CTSA, 5 May 2025
- Email, Cleansing, 11 May 2025
- Memo, City Gardens, 15 July 2025
- Memo, Air Quality Officer, 15 July 2025
- Email, Environmental Health Officer, 16 July 2025

External Consultations

- Email, The Georgian Group, 08 April 2025
- Email, Environment Agency, 10 April 2025
- Letter, The City of London Archaeological Trust, 11 April 2025
- Letter, Tower Hamlets, 16 April 2025
- Letter, Historic England – GLAAS, 22 April
- Letter, The Georgian Group, 28 April 2025
- Letter, Environment Agency, 2 May 2025
- Email, Historic Buildings & Places, 6 May 2025
- Letter, SAVE, 9 May 2025
- Letter, Southwark Council, 12 May 2025
- Memo, TfL, 30 May 2025
- Letter, Historic England, 27 May 2025

Representations

- Support, Joseph Onofrio, 8 April 2025
- Objection, Graham Bennett, 10 April 2025
- Support, Alun Watkins, 10 April 2025
- Support, Martin Dubbey, 13 April 2025
- Support, James Jarvie, 13 April 2025
- Support, Graham Titmuss, 15 April 2025
- Support, Graeme Stewart, 16 April 2025
- Support, Paul Bamford, 16 April 2025
- Support, Adam Bourne, 16 April 2025
- Support, Joanne Pilmoor,16 April 2025
- Support, Stephen Anchor, 17 April 2025
- Objection, River Residents Group, 18 April 2025
- Support, Iain Reitze, 18 April 2025
- Support, David Whitehead, 22 April 2025
- Support, Jackie Alexander, 24 April 2025
- Support, Andrew Sampson, 4 May 2025
- Support, Mark Henwood, 9 May 2025
- Support, Cort Malmberg, 10 May 2025

Appendix A

Putative refusal reasons for applications 20/00631/FULMAJ and 20/00632/LBC

	25/00270/FULMAJ
1	The proposed development would not ensure the continued beneficial use for a historic building. It has not been demonstrated that the proposal would conserve the amenity of existing neighbouring occupiers due to noise and overlooking or provide satisfactory or safe arrangements for servicing vehicles. The proposed development for the change of use of the existing building to a hotel (Use Class C1) would therefore not accord with, Local Plan Policy, CS10, CS11, DM3.5, DM11.3, DM15.7, DM21.3 and draft City Plan Policies HL3, HS3, CV3, DE5, S23, S24, and SB1, and London Plan Policies D3, D6, D13, D14.
2	The proposed development would fail to preserve the special architectural and historic interest and setting of the London Custom House (Grade I) and the River Wall, Stairs and Cranes (Grade II*), causing less than substantial harm to their heritage significance the result of direct and in-direct impacts on setting, resulting from external and internal alterations, extensions, loss and de-contextualisation of historic fabric, plan form and character. The harm would not be outweighed by public benefits. The proposal is not in accordance with policies: London Plan Policy HC1; Local Plan Policies CS 12, DM 12.1, DM 12.3; HE1; Draft City Plan Policies S11 and HE1 and the NPPF.

3	The proposed development would fail to preserve the settings of Old Billingsgate (grade II), St Dunstan in the East Ruin (Grade I) and by association its Walls, Gates and Railings to the Churchyard (Grade II), the Monument to the Great Fire (Grade I and Scheduled Ancient Monument), All Hallows by the Tower (Grade I), Tower Bridge (Grade I), the Eastcheap Conservation Area, the Tower Bridge Conservation Area and the Tooley Street Conservation Area, causing harm to their heritage significance and an appreciation of it by way of contribution made by elements of setting. The harm would not be outweighed by public benefits. The development would not be in accordance with Local Plan Policies: CS 12, DM 12.1, DM 12.3; London Plan Policy HC1; City Plan Policies S11 and HE1; and policies and guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance.
4	The proposed development would not comprise a high standard of design as a result of its architecture, in particular the roof extensions, which by virtue of their siting, height, massing, appearance and detailed design, by day and night, would fail to be visually integrated into the overall design of the building when seen from street and higher level view, which would not be sympathetic and contextual to character or history, adversely affecting the character and appearance of the host building, contrary to Local Plan Policies CS 10, DM 10.1 , Emerging City Plan Policies and the NPPF and National Design Guide.
5	The proposed development would comprise an intrusive form of development causing harm to the characteristics of London View Management Framework (LVMF) designated River Prospects from London Bridge (11B.1-2) and Tower Bridge (10A.1) including impact on the setting of the Monument as a landmark element and the Townscape View from the Queen's Walk at City Hall (25A.1-3). The development is not in accordance with Local Plan Policies: Local Plan CS 13(1); London Plan HC4; City Plan S13 and guidance contained in the LVMF SPG.
6	By virtue of the height, bulk, massing and appearance of the roof extensions, associated terraces and alterations to roof level, the proposal would fail to protect and enhance significant local views of and from the Monument, and would fail to protect and enhance views of identified historic city landmarks and skyline features, namely Tower Bridge, St Dunstan in the East and All Hallows by the Tower. The development is not in accordance with Local Plan Policies: Local Plan CS 13(2); City Plan Policy S13 and guidance in the Protected Views SPD.
7	The proposed development would not result inclusive access by closure wholly and partly for events on the Quayside and limited internal public permeability which would limit the interpretation and enjoyment of a seminal heritage asset. The management, pedestrian movement, curation, detailed design and look-and-feel of the internal and external public realm, including the interface created between these would result in a non-inclusive form of public realm. The vibrancy or animation of the riverside for public use with

	limited active frontages and restricted publicly accessible open space would fail to deliver a fairer, more equitable and inclusive place which is welcoming to all communities whilst conflicting with the spatial aspirations of the emerging Pool of London Key Area of change. The proposal would not be in accordance with Local Plan Policies CS9, CS10, CS19, DM10.4 the overarching good growth objectives in the London Plan, London Plan policies D5, D8, S4, SI14 and SI16, Draft City Plan S17, S19, DE3, S14, OS1, CV2, HL1, the aspirations of the Riverside Walkway Enhancement Strategy SPD 2015, Mayor's Public Charter.
8	It has not been demonstrated that the proposed development would provide highest standard of accessible design including disabled access provisions or facilities both within the hotel development and externally within the Quayside area or adjacent areas of Public Highway. The development would not meet the highest standard of accessibility and inclusive design and would not be in accordance with Local Plan policies CS10, DM10.1, DM10.5 and DM10.8, policies D5 and E10 of the London Plan or policies S1 and S8 of the draft City Plan.
9	The lay-by would result in the width of the pavement being reduced on Lower Thames Street therefore not promoting active travel by walking and diminish pedestrian comfort levels (PCL). The development would therefore not accord with Local Plan Policy DM16.1, DM16.2, emerging City Plan Policies AT1 and AT2, London Plan Policies T1 and T2, The Mayor's Transport Strategy and the City of London Transport Strategy.
10	In the absence of a scheme for offsite consolidation it has not been demonstrated that the development would facilitate safe, and efficient deliveries and servicing of the site, including adequate safety and servicing of the Quayside for events. The proposed would therefore not accord with Local Plan Polices DM16.1 and DM16.5, London Plan Policy T7 or emerging City Plan Policy VT2.
11	It has not been demonstrated that the proposed development would not have a detrimental impact on Pedestrian Comfort Levels as a result of the change of use of the site and the potential for increased capacity. The applicant has failed to demonstrate that the closure of the quayside would not create unacceptable Pedestrian Comfort Levels and would therefore not be in accordance with London Plan Policy T4 or TfL Pedestrian Comfort Guidance for London 2019.
12	The applicant has failed to enter into an appropriate legal agreement to secure the provision of appropriate site specific mitigation including; Highway Reparation and other Highways Obligations; Local Procurement Strategy; Local Training, Skills and Job Brokerage Strategy (Demolition; Construction and End Use); Delivery and Servicing Management Plan (including Consolidation); Travel Plan (including Cycling Promotion Plan); Section 278 Agreement (CoL); Section 278 Agreement (TfL); Declaration of City Walkway; Visitor Management Plan; Cultural Strategy and associated Cultural Plan (including Cultural officer, Cultural Committee and Heritage

	Partner); Public Access Management Plan; and Quayside Events Management Plan and Planning Obligations in relation to Affordable Housing; Local Training, Skills and Job Brokerage; Carbon Reduction Shortfall; Section 278 Design and Evaluation; and S106 Monitoring Charge. The development therefore conflicts with Policy CS4 and the City's Planning Obligations SPD.
25/00271/LBC	
1	The proposed development would fail to preserve and would cause less than substantial harm to the exceptional special architectural and historic interest and setting of the Grade I listed London Custom House and the Grade II* listed River Wall, Stairs and Cranes at Custom House Quay which would not be outweighed by public benefits. The harm would result from external and internal extension, alteration and the loss of historic fabric, plan form and character. These proposals would be contrary to policies: London plan Policy HC 1; Local Plan Policies CS 12, DM 12.1, DM 12.3; Draft City Plan Policies S11 and HE1 and the NPPF.

Appendix B

London Plan Polices

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety
- Policy D14 Noise
- Policy S5 Sports and recreation facilities
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space

- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy S12 Flood risk management
- Policy SI13 Sustainable drainage
- Policy SI14 Waterways- strategic role
- Policy SI15 Water transport
- Policy SI16 Waterways- use and enjoyment
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T7 Deliveries, servicing and construction

Relevant GLA Supplementary Planning

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);

- Central Activities Zone (March 2016);
- Mayor's Transport Strategy (2018);
- Public London Charter (September 2021).

Emerging City Plan 2040

- Policy S1 Healthy and inclusive city
- Policy HL1 Inclusive buildings and spaces
- Policy HL2 Air Quality
- Policy HL3 Noise
- Policy HL4 Contaminated land and water quality
- Policy HL5 Location and protection of social and community facilities
- Policy HL6 Public toilets
- Policy HL7 Sport and recreation
- Policy HL8 Play areas and facilities
- Policy HL9 Health Impact Assessment (HIA)
- Policy S2 Safe and Secure City
- Policy SA1 Publicly accessible locations
- Policy SA2 Dispersal Routes
- Policy SA3 Designing in Security
- Policy S3 Housing
- Policy HS3 Residential environment
- Policy S4 Offices
- Policy OF1 Office Development
- Policy OF2 Protection of Existing Office Floorspace
- Policy S5 Retail and active frontages
- Policy RE2 Active frontages
- Policy S6 Culture and Visitors
- Policy CV2 Provision of Arts, Culture and Leisure Facilities
- Policy CV3 Provision of Visitor Facilities
- Policy CV4 Hotels
- Policy CV5 Evening and Night-Time Economy
- Policy S7 Infrastructure and Utilities
- Policy S8 Design
- Policy DE1 Sustainable Design
- Policy DE2 Design Quality
- Policy DE3 Public Realm
- Policy DE4 Terraces and Elevated Public Spaces
- Policy DE5 Shopfronts
- Policy DE6 Advertisements
- Policy DE7 Daylight and sunlight
- Policy DE8 Lighting
- Policy S9 Transport and Servicing
- Policy VT1 The impacts of development on transport
- Policy VT2 Freight and Servicing

- Policy VT3 Vehicle Parking
- Policy S10 Active Travel and Healthy Streets
- Policy AT1 Pedestrian Movement, Permeability and Wayfinding
- Policy AT2 Active Travel including Cycling
- Policy AT3 Cycle Parking
- Policy S11 Historic Environment
- Policy HE1 Managing Change to the Historic Environment
- Policy HE2 Ancient Monuments and Archaeology
- Policy HE3 Setting of the Tower of London World Heritage Site
- Policy S13 Protected Views
- Policy S14 Open Spaces and Green Infrastructure
- Policy OS1 Protection and provision of open spaces
- Policy OS2 Urban Greening
- Policy OS3 Biodiversity
- Policy OS4 Biodiversity Net Gain
- Policy OS5 Trees
- Policy S15 Climate Resilience and Flood Risk
- Policy CR1 Overheating and Urban Heat Island Risk
- Policy CR2 Flood Risk
- Policy CR3 Sustainable drainage systems (SuDS)
- Policy CR4 Flood protection and flood defences
- Policy CE1 Sustainable Waste Facilities and Transport
- Policy S17 Thames Policy Area
- Policy S19 Pool of London

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Air Quality (July 2017);
- Planning for Sustainability (November 2023);
- City of London Lighting (October 2023);
- Archaeology and Development Guidance (July 2017);
- City Public Realm (July 2016);
- City Transport Strategy (October 2024);
- City Waste Strategy 2013-2020 (January 2024);
- Open Space Strategy (January 2015);
- Protected Views (January 2012);
- Planning Obligations (May 2021)
- Office Use (January 2015);
- Preventing suicides in high rise buildings and structures PAN (November 2022);
- Freight and Servicing (February 2018);
- Riverside Walk Enhancement Strategy (2015);
- City of London Thames Strategy (2015);
- Flood Emergency Plans for New Development (2020).

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

CS2 Utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Security and Safety

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

CS4 Planning contributions

To manage the impact of development, seeking appropriate developer contributions.

CS9 Thames and the Riverside

To ensure that the City capitalises on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding.

CS10 Design

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

CS11 Visitor, arts and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy

CS12 Historic environment

To conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors.

CS13 Protected views

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

CS15 Sustainable development and climate change

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

CS16 Public transport, streets and walkways

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

CS17 Waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Flood risk

To ensure that the City remains at low risk from all types of flooding.

CS19 Open spaces and recreation

To encourage 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.

CS20 Retailing

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS21 Housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Social infrastructure and opportunity

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

Policy DM 1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there

are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

a) prejudicing the primary business function of the City;

b) jeopardising the future assembly and delivery of large office development sites;

c) removing existing stock for which there is demand in the office market or long term viable need;

d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;

b) reasonable gas and water supply considering the need to conserve natural resources;

c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;

e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

Policy DM 3.1

Self-containment in mixed use developments 295 Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring: a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries; b) measures to be integrated with those of adjacent buildings and the public realm; c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm; d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles; e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;

f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

a) conducting a full risk assessment;

b) keeping access points to the development to a minimum;

c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;

d) ensuring early consultation with the City of London Police on risk mitigation measures;

e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;

b) restricting motor vehicle access, where required;

c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;

d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) 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 no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;

b) 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.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;

b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;

c) appropriate, high quality and durable materials are used;

d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;

e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;

f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;

g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;

h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;

i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

k) there is provision of amenity space, where appropriate;

l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;

b) adversely affect rooflines or roof profiles;

c) result in the loss of historic or locally distinctive roof forms, features or coverings;

d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a

high standard of design, sustainability, surface treatment and landscaping, having regard to:

a) the predominant use of the space, surrounding buildings and adjacent spaces;

b) connections between spaces and the provision of pleasant walking routes;

c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;

d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;

e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;

f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;

g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;

h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;

i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;

j) the use of high quality street furniture to enhance and delineate the public realm;

k) lighting which should be sensitively co-ordinated with the design of the scheme.

Policy DM 10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

• respect the quality and architectural contribution of any existing shopfront;

• respect the relationship between the shopfront, the building and its context;

• use high quality and sympathetic materials;

• include signage only in appropriate locations and in proportion to the shopfront;

• consider the impact of the installation of louvres, plant and access to refuse storage;

• incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;

• not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;

• resist external shutters and consider other measures required for security;

• consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;

• be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

Policy DM 10.6 Advertisements

1. To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City.

2. To resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level.

DM10.7 Daylight and sunlight

1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;

c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

Policy DM 11.1 Protection of Visitor, Arts and Cultural Facilities

1. To resist the loss of existing visitor, arts and cultural facilities unless:

• replacement facilities are provided on-site or within the vicinity which meet the needs of the City’s communities; or

• they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or

• it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

2. Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will

only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;

b) ensuring that financial provision is made for the future maintenance of new public art;

c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Ancient monuments and archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;

b) an energy statement in line with London Plan requirements;

c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;

b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;

c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and nondomestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be

designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated onsite will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for

combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.***DM15.7 Noise and light pollution***

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

a) road dangers;

b) pedestrian environment and movement;

c) cycling infrastructure provision;

d) public transport;

e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;

b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

a) reuse of existing structures;

b) building design which minimises wastage and makes use of recycled materials;

c) recycling of deconstruction waste for reuse on site where feasible;

d) transport of waste and construction materials by rail or river wherever practicable;

e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;

b) the benefits of the development outweigh the flood risk to future occupants;

c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site specific flood risk assessment for:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and

b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

Policy DM 18.3 Flood protection and climate change resilience

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.

2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;

b) provide a high quality environment;

c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;

d) have regard to biodiversity and the creation of green corridors;

e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

a) green roofs and walls, soft landscaping and trees;

b) features for wildlife, such as nesting boxes and beehives;

c) a planting mix which encourages biodiversity;

d) planting which will be resilient to a range of climate conditions;

e) maintenance of habitats within Sites of Importance for Nature Conservation.

Policy DM 20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.

2. Major retail units (over 1,000m2) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;

b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

Policy DM 22.1 Location and protection of social and community facilities

1. To resist the loss of social and community facilities unless:

• replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or

• necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or

• it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

• where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;

• in locations which are convenient to the communities they serve;

• in or near identified residential areas, providing their amenity is safeguarded;

• as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Policy DM 22.2 Provision of public toilets

A widespread distribution of public toilets which meet public demand will be provided by:

• requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;

• supporting an increase in the membership of the Community Toilet Scheme;

• resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;

• taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

Schedule

Application: 25/00270/FULMAJ

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.

Conditions

Time Limit for Commencement	
1	**Time Limit** The development hereby permitted shall be begun before the expiration of three years from the date of this permission. Reason: To ensure compliance Section 91 of the Town and Country Planning Act 1990.

Sustainability	
2	**Circular Economy** Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of new building elements and of the interventions in order to distinguish the historic from the new fabric. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the life-cycle of the development. REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the London Plan; D3, SI 7, SI 8 - Local Plan 2015; CS 17, DM 17.2 – Emerging City Plan 2040 policies S8 and DE1.
3	**Post-Construction Circular Economy** No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development. The Statement is to include actual waste arisings and final processing routes for all existing materials. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan and Policy S16 of emerging City Plan 2040.
4	**Whole Life Cycle Carbon Emissions** Prior to the commencement of the development (excluding demolition and strip-out works), and following completion of RIBA Stage 4, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life-Cycle Carbon emissions of the development achieve at least the GLA’s Standard Benchmarks and setting out further opportunities to achieve the GLA's Aspirational Benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the

	development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development, that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance and that the development is sustainable in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan 2015 policies, DM15.2, DM 17.2 – emerging City Plan 2040: S8, DE1.
5	**Post-construction whole-life cycle carbon emissions** Once the as-built design has been completed (upon commencement of RIBA Stage 6 the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2-4), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received no later than three months post as-built design completion, unless otherwise agreed. REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan, policy CS15 of the Local Plan (2015) and policies S8 and DE1 of emerging City Plan 2040.
6	**Energy Network Connection** The development shall be designed to allow for the future connection into a district heating network if this becomes available during the lifetime of the development. This is to include the allocation of plant space and a protected route for connection in and out of the site. REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the London Plan: SI3 - Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4 - emerging City Plan 2040 policy DE1.
7	**Emergency Power Supply** Prior to the commencement of development, excluding demolition and strip out, details of the emergency power supply shall be submitted to and

	approved in writing by the LPA. Details shall include an assessment of feasible non-combustion alternatives and confirmation of the proposed technology for the development. The selected supply shall follow the emergency supply hierarchy detailed in the Planning for Sustainability SPD, 2025. Where it is not possible to deploy alternatives in the hierarchy, proper justification shall be submitted to and approved by the LPA prior to commencement of development. Where diesel generators are justified, they must comply with the Air Quality SPD 2017 and details of the appliance/plant must be submitted to and agreed by the LPA before installation. Any generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency or other occasions as agreed in any approved details submitted in relation to this condition, and for the testing necessary to meet that purpose, and shall not be used at any other time. The development shall be implemented in accordance with the approved details and be retained as such for the lifetime of the development. REASON: To demonstrate that local air quality is maintained and operational carbon emissions have been minimised in accordance with Local Plan policies CS15, DM15.1, DM15.2, DM15.6, London Plan policies SI 1, SI 2, SD 4, and emerging City Plan 2040 policies S1, HL2, S8, DE1.
8	**Climate Change Resilience Sustainability Statement - Pre-commencement** Prior to the commencement of the development (other than demolition and strip-out) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to: solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4

9	**Climate Change Resilience Sustainability Statement – Post completion** Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.
10	**BREEAM** A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion. REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.
11	**Habitat Maintenance and Management Plan** Prior to the commencement of the development, excluding demolition and strip-out, a Habitat Maintenance and Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following: • detailed locations/specifications of bat boxes and bird boxes • details of ground based green wall, planters, and shrub planting • details of tree protection measures The measures as set out in the plan shall be carried out and so maintained. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.
12	**Pre-commencement Landscaping Strategy, and UGF** Prior to commencement of the relevant works, details of the proposed landscaping scheme, including:

	• Details, size, and position, of the measures proposed to meet the approved Urban Greening Factor score of 0.18. • measures installed to enhance biodiversity • plant and habitat species and scaled drawings identifying the measures and maintenance plans shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. Any survey data collected is to be submitted to Greenspace Information for Greater London CIC (GiGL) to support the City of London fulfilling its statutory reporting requirements. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS2 and OS4
13	**Post Construction Landscaping Strategy, and UGF** Within 6 months of completion of the delivered landscaping scheme, details including: • Details, size, and position, of the measures installed to meet the approved Urban Greening Factor score of 0.18. • measures installed to enhance biodiversity • plant and habitat species and scaled drawings identifying the measures and maintenance plans shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. Any survey data collected is to be submitted to Greenspace Information for Greater London CIC (GiGL) to support the City of London fulfilling its statutory reporting requirements. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS2 and OS4.
	Arboricultural
14	**Arboricultural Method Statement** a) Prior to the commencement of development an Arboricultural Method Statement (AMS) in accordance with BS5837:2012, including a tree protection plan(s) (TPP) and a schedule of Arboricultural supervision by a suitably qualified tree specialist shall be submitted and approved in writing by the Local Planning Authority. The AMS must provide the specification of investigatory work to be undertaken to determine the protective methods of working and any design changes necessary to preserve existing trees and tree roots – such investigatory works to include trial digs to determine the extent of tree roots present where

	works are proposed within root protection areas (RPAs). Once approved the investigatory works must be carried out in accordance with the approved details. b) After the approved investigatory works under part a) have been undertaken and prior to the commencement of any below ground level works, an updated AMS shall be submitted and approved in writing by the Local Planning Authority. The updated AMS shall provide the findings of the investigatory works and provide details of any amendments necessary to the AMS submitted under part a) of this condition as a result of the evidence gathered during the investigatory work. c) Notwithstanding the approved drawings, after the details under part b) have been approved and prior to the commencement of the relevant works, the final design and accompanying AMS for the foundations and ground works required for the terraces, stairs and ramps at the southern elevation of the building shall be submitted and approved in writing by the Local Planning Authority, with details as to how this design reflects the conclusions of the AMS and investigations approved under part b) of this condition. All protective measures within the AMS approved under part b) of this condition shall be carried out prior to the commencement of the relevant parts of the development (being below-surface-level works to the Quayside, excavation works related to the proposed basement extension, and erection of the terrace areas, steps and ramps along the southern elevation of the building) and maintained throughout the construction period, or for the lifetime of the development where relevant. REASON: To ensure that the Local Planning Authority may be satisfied with the Arboricultural impact of the proposals, and to ensure that all trees within the site are sufficiently protected during the construction period and for the lifetime of the development, in accordance with Local Plan Policies CS15, CS19, DM10.4, DM19.1 and DM19.2, London Plan Policies D8, G1, G5, G6 and G7, and emerging City Plan 2040 Policies S14, OS2, OS3, and OS5.
Environmental Health	
15	**Scheme of Protective Works** Works shall not begin until a scheme for protecting residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the

	Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution) REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
16	**Use of Roof** No part of the roof shall be used or accessed by the occupiers of the building, other than in the case of emergency or for maintenance 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.
17	**Music/Noise Quayside** No live or recorded sound associated with the Quayside Activation Plan (when measured in terms of LAeq) should exceed the existing background noise level (LA90) by more than 5 dB at 1 m from any neighbouring noise sensitive receptor. Additionally, low frequency event noise (L10) should not exceed the background noise level by more than 5 dB in any 1/3 octave band between 40-160 Hz. No events within the activation areas in the Quayside, involving live or recorded sound (including PA systems) shall take place outside of hours 10:00 and 21:00, Monday to Sunday. Live or recorded sound shall only be played in one activation area at any one time. There shall be no more than a total of 40 events across both activation areas in a 12-month period. REASON: 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 and DM21.3.
18	**Quayside Activation Areas Hours** No events shall take place in the east and west activation areas within the quayside outside of the hours 10:00 to 21:00 Monday to Sunday and no events of any kind shall take place outside of the activation areas at any time. 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 and DM21.3.
19	**Terrace Hours**

	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. 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), 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. 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 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.
23	**Plant Noise** **(**a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the worst affected noise sensitive premises (see informative). The background noise level shall be expressed as the lowest typical LA90 (15 min) during which time plant is or may be in operation. (b) Following installation but before the new plant comes into operation measurements of noise from the new plant shall be taken (unless otherwise agreed in writing by the local planning authority) and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

	(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority. REASON: To ensure that the proposal meets the requirements of the Agent of Change principle, and that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3, DM15.7, D21.5 and London Plan Policy D13.
24	**Mounting of Plant** Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
25	**Fumes from Use Class E affecting offices or residential** Before any works thereby affected are begun, a scheme shall be submitted and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Sui Generis (food and beverage uses) Use Class E (d) (spa and health centre) and . Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details must be approved implemented before the Sui Generis (food and beverage uses) and Use Class E (d) (spa and health centre) uses take place and retained for the lifetime of the development. REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
26	**Cleaning, servicing and maintenance of ventilation and extraction equipment** All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance. REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

27	**Hotel room noise levels** All residential premises, including hotel accommodation, in the development shall be designed and constructed to attain the following internal noise levels: Bedrooms- 35dB LAeq (07:00-23:00) , 30dB LAeq,T* and 45dB LAmax not to be exceeded more than 10 times per night), *T- Night-time 8 hours between 23:00-07:00 Living rooms- 35dB LAeq, T* , *T- daytime 16 hours between 07:00-23:00 A report detailing the sound insulation properties of the building envelope shall be provided and shall include the specification and acoustic data sheets for glazed areas of the development and any complementary acoustic ventilation scheme. Where external noise levels exceed WHO guidelines then provision of acoustic ventilation will need to be considered. A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any relevant part of the building. REASON: To ensure that the proposal meets the requirements of the Agent of Change principle and that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3, DM15.7, D21.5 and London Plan Policy D13.
28	**Vehicle Lift** (a) The level of noise emitted from the basement vehicle lift and the barriers used to control vehicle entry and exit to the vehicle lift shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the basement lift, and barrier are or may be in operation. (b) Following installation but before the basement vehicle lift and entry /exit barriers comes into operation measurements of noise from the basement vehicle lift and associated barriers must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. (c) All constituent parts of the new basement vehicle lift and entry / exit barriers shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

	REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
29	**Mounting of vehicle lift** Before any mechanical basement lift is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
30	**Commercial Kitchen Drainage** Drainage serving commercial kitchens within this development shall be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825- 2:2002 or other effective means of grease removal. The details of the grease separator shall be provided to the planning authority prior to the operation of the kitchen. The grease separator shall be retained and kept in serviceable condition so long as the commercial food use continues. REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8
31	**Contaminated Land** A) Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. B) Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. C) Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

	REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. 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.
	SuDS
32	**SuDS Detailed Design** Before any construction (excluding demolition and strip out) works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: greening, rainwater harvesting, rainwater pipework, design for water treatment, flow control devices, outfalls, arrangements for tidal locking, design for system exceedance, design for ongoing maintenance, design for avoiding inappropriate connections; all surface water shall discharge directly to the Thames, should this not be possible for limited areas, flow rates shall be restricted to as close to greenfield runoff rate as is feasible and for that area to discharge to the combined sewer with Thames Water's consent, provision should be made for an attenuation volume capacity capable of achieving this; (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that the relevant permits for discharging to the Thames have been acquired from the Port of London Authority and the Environment Agency. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
33	**SuDS Lifetime Maintenance** Prior to occupation the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) A Lifetime Maintenance Plan for the SuDS system to include:

	- A full description of how the system would work, it's aims and objectives, the flow control arrangements and passive design actions that have been implemented to help avoid inappropriate future connections; - A Maintenance Inspection Checklist/Log; - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
Archaeology	
34	**Written Scheme of Investigation** No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. If remains of the nationally significant Roman river wall are encountered during the development, a mitigation strategy to avoid or minimise harm will be required. C. Details of a programme for delivering related positive public benefits. This should be formulated in association with the proposals in the Cultural Strategy D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
35	**Salvage and Reuse** No development shall take place until a scheme for identifying materials for salvage and their retention and reuse within the development have been submitted to and approved by the local planning authority. The development shall be carried out in accordance with the approved scheme. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
Flood Risk	

36	**Detailed Design of Flood Defences** The development hereby permitted must not be commenced until detailed designs of the fully replaced flood defence, including the new vehicle access flood gate, have been submitted to, and approved in writing by, the Local Planning Authority (LPA), in consultation with the Environment Agency. A submitted detailed design of the replacement flood defence and vehicle access flood gate must include, but not be limited to, the following details: • That the flood defence shall be designed with a lifetime no less than 100 years from the date the last dwelling is expected to be completed; • That the flood defence shall be designed with a crest level no lower than the Thames Estuary 2100 Plan 2090 level. At present, the flood defence crest height should be set at a minimum of 6.35 mAOD. • Details of how the replacement flood defence structure will tie into the flood defences and ground levels on the neighbouring sites both upstream and downstream; • Demonstrate that the flood defence will be structurally independent and not rely on secondary structures, such as the existing river wall, the proposed development or any proposed additional buried elements; • The flood defence design shall be supported by full structural and stability calculations including design checks, and any needed ground investigation works. • Details of any proposed landscaping, footpaths, lighting, street furniture, planting and any underground services, utilities and drainage features within the area between the flood defence and the proposed buildings. It needs to be demonstrated that these features will not adversely impact the structural integrity of the flood defence, or restrict access to the defence for maintenance, inspections and emergency works. Street furniture within 10 metres of the flood defence wall with features that could restrict access must be demountable. • Tracking diagram demonstrating vehicle tracking along the entire frontage of the flood defence. • Details of the replacement vehicle access flood gate, demonstrating that the proposed replacement gate will be: o No wider than the existing flood gate. o Set no lower than the existing gate threshold height The approved detailed design of the fully replaced flood defence should then be implemented in full and maintained for the lifetime of the development. REASON: To protect the structural integrity of the flood defence. To ensure the development is safe from flood risk for its lifetime and to ensure that there is no increase in flood risk elsewhere or on site as a result of the development in line with NPPF paragraph 181, as well as Policy CS18 (Flood Risk) of the adopted City Plan.
37	**Scheme to be agreed - Flood Gate Operational Contingency Plan**

	Prior to any works to the flood defences/flood gate, a Flood Gate Operational Contingency Plan shall be submitted to, an approved in writing by, the LPA, in consultation with the Environment Agency. The Flood Gate Operational Contingency Plan must include: • Details of how the flood gate will be operated under various modes of operation, including degraded modes of operation. • Who will be responsible for operating the flood gate, at all times, and what the operational arrangements will be from receiving a Central London Flood Alert and closing the flood gate. REASON: To ensure a continuous defence line is maintained and that the development is safe from flood risk for its lifetime and to ensure there is not increase in flood risk elsewhere or on site as a result of this development in line with NPPF paragraph 181, as well as Policy CS18 (Flood Risk) of the adopted City Plan.
38	**Flood Emergency Plan** Prior to the occupation of the proposed development, an updated Flood Emergency Plan shall be submitted to an approved in writing by the Local Planning Authority. REASON: To ensure that public safety and the safety of people using the site are maintained and to comply with Local Plan policies CS18, DM18.1, and DM18.3 and the NPPF.
	Air Quality
39	**Air Quality Neutral Assessment** Prior to the installation of any generator to be used for any purpose outside of emergency life-safety, a revised Air Quality Neutral assessment that considers the building emissions must be submitted. The assessment must follow the latest Air Quality Neutral guidance. REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the emerging City Plan 2040, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan.
40	**Height of Combustion Flues** Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants and must be located away from ventilation intakes and accessible roof gardens and terraces.

	REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.
41	**NRMM** Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
	Design/Public Realm
42	**Demolition** The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur or be necessary. REASON: To ensure the stability of the structure to be retained in accordance with the following policy of the Local Plan: DM12.3.
43	**Structural Condition** Prior to the commencement of works a Structural Condition and Implementation Strategy, produced by a conservation-accredited engineer(s), shall be submitted to and approved in writing by the LPA and the works undertaken in accordance with the approved details. This should include: A. Details of opening up for structural investigation to understand and inform detailed structural designs. B. Demonstrate structure is capable of receiving intended loads through investigation and testing C. A structural design showing the impact of the service trench works on the historic fabric below basement level.

	D. A structural design showing the builders work penetrations through the existing vaulting. E. structural design showing the King's Warehouse and Long Room, plus a detailed strategy for timber floors more generally. REASON: to ensure the special interest of the listed building in accordance with CS 12, DM12.1, DM 12.3.
44	**Landscaping Planting** Prior to the commencement of landscaping works, a detailed landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority, including details of: (a) Irrigation; (b) Provision for harvesting rainwater run-off from road to supplement irrigation; (c) Spot heights for ground levels around planting pit; (d) Soil; (e) Planting pit size and construction; (f) Tree guards; and (g) Species and selection of trees/shrubs including details of its age, growing habit, girth of trunk, how many times transplanted and root development. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DMI0.1, DM19.2.
45	**Balustrades** Before any works thereby affected are begun, details of all balustrades to external terrace areas, together with an associated risk assessment, including any other means necessary to mitigate the risk identified within the risk assessment, shall be submitted to and approved in writing by the Local Planning Authority and the balustrades shall be delivered as approved and retained for the life of the building, unless otherwise approved in writing. REASON: To ensure that the Local Planning Authority may be satisfied that there are appropriate safety measures in place in accordance with the guidance in the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) and the following policy of the Local Plan: CS3; and DM3.2.

46	**Sample Facade Bays** Before the works thereby affected are begun, sample panels of agreed sections of the facades including, east wing courtyard, west wing courtyard and quayside terrace shall be built on site, agreed and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMl0.1, DMl0.5, DM12.2.
47	**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 Bllingsgate 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). 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.
48	**Materials** 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) Particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces, east and west courtyards, including sample panels of all new stonework, brickwork, ironmongery and joinery; B) Particulars and samples of the materials to be used on all external faces of the quayside including Old Billingsgate Lane, the Quayside, Quayside Terrace Water Lane, Lower Thames Street and listed river wall and steps. C) Particulars and samples of material finishes to be used on floors, walls and fenestration in the Entrance Hall from Lower Thames Street, Kings Warehouse, Robing Room, Long Room, Ground Floor Café and Gallery Spaces, Staircases, a typical bedroom in the east and west wings spa & swimming pool area.

	D) Full details and technical specification for any new glazing including, opacity, colour, reflectivity, profile, fixings and depth. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMl0.1, DMl0.5, DM12.2.
49	**Services** 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) Details of all new ductwork and typical risers including additional structural intervention required to accommodate these and any associated penetrations (wall, ceilings), including associated grills, including with regards to a typical east wing and west wing bedroom, Café, Swimming Pool, Spa, Long Room and Kings Warehouse. B) Full details of swimming pool and all associated plant, including any tanking, cleaning, heating, venting and maintenance requirements. 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.
50	**Façade Cleaning** 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) Full details including methodology and technical specification for all façade cleaning and repair. No cleaning of masonry, other than low pressure (20-100 psi) surface cleaning using a nebulous water spray is authorised by this consent without the prior approval of the Local Planning Authority. Before work begins, any other cleaning proposals must be approved in writing and carried out strictly in accordance with those details. At the commencement of the cleaning, a test panel shall be undertaken in an inconspicuous position and the method recorded to the approval of the Local Planning Authority. B) Before work begins, a method statement showing how the cleaning will conform to BS 8221-1:2012 (Code of practice for cleaning and surface repair of buildings. Cleaning of natural stone, brick, terracotta and concrete) must be agreed and approved in writing by the Local

	Planning Authority. Cleaning shall be implemented strictly in accordance with the statement. 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.
51	**Lighting Strategy** Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design in accordance with the adopted City of London Lighting Strategy SPD shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: (a) lighting layout/s; (b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure as well as impact on decorative soffits); (c) a lighting control methodology; (d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; (e) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass (f) details of impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering; (g) details of how the lighting proposals will be inclusive for a range of people including options for testing sightlines and transitions. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE8 of the emerging City Plan 2040.
52	**Public Realm details** 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 development pursuant to this permission shall be carried out in accordance with the approved details: A) Materials and samples of the public spaces, including flooring, street furniture, boundary treatments, seating, lighting, soffits, bollards, cycle stands, lampposts, drinking fountain and any infrastructure required to deliver programmed uses and public art; B) particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access;

	C) details of all railings, handrails and balustrades and staircases and steps; D) Details and locations of the drinking fountains; E) details of all drainage, irrigation and rainwater harvesting; F) Details of planters, trees and other planting, biodiverse habitats, drainage, maintenance strategy and a rainwater harvesting system to support high quality urban greening. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2, CS10, DM10.1, DM10.4 and DM12.2.
53	**Public Art & Interpretation Strategy** 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 development pursuant to this permission shall be carried out in accordance with the approved details: Details of a new public art, interpretation and culture strategy within the Public Realm and to Kings Warehouse, Galleries and Entrance Hall interior, which is appropriate and is of artistic/historic merit, is deliverable and can be maintained shall be submitted to and approved in writing by the Local Planning Authority. REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM11.2
	Highways and Transportation
54	**Demolition and Construction Logistics Plans** Prior to the commencement of any works, details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing. The details shall be drafted in accordance with the Mayor of London's Construction Logistics Plan Guidance dated April 2021, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how work-related road risk is to be managed. Traffic management drawings must accompany the document and be drafted in accordance with the "Safety at Streetworks and Road Works – A Code of Practice". No demolition or construction shall be carried out other than in accordance with approved details and methods.

	The Demolition and Construction Logistics Plan shall include an inclusive design statement that demonstrates how clear movement will be maintained for a range of people through the different stages of the construction process and taking account of flood events. REASON: To ensure that demolition and construction works do not adversely impact public safety and the transport network, in accordance with London Plan Policy 6.14 and Local Plan policies DM15.6 and DM16.1. These details are required prior to the commencement of demolition and construction works to minimize the impact on the transport network from the start of these activities
55	**Windows and doors not opening outwards** No doors, gates or windows at ground floor level shall open over the public highway. REASON: In the interests of public safety and comply with the Section 153 of the Highways Act 1980.
56	**Site Condition Survey** Before any construction works including demolition are begun, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out. Details must be submitted to and approved in writing by the local planning authority. REASON: To ensure the satisfactory reinstatement of the highways, upon completion of construction works, in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement of any construction works to record the condition of the surrounding highways.
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 () 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.
58	**Delivery and Servicing** Before any works affected thereby are begun, details of the vehicle lift and associated facilities at basement level to provide adequate servicing, including loading and unloading, and maintenance of the vehicle lift must be submitted to and approved in writing by the local planning. The approved facilities must be maintained and used as approved for the lifetime of the building. REASON: To ensure that traffic in surrounding streets is not impeded, and a free flow of traffic is maintained in accordance with the following policy of the Local Plan: DM16.5.
59	**Delivery and Servicing Hours** No servicing of the premises shall be carried out between the hours of 07:00 and 10:00, 12:00 and 14:00 and 16:00 and 19:00. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
60	**Restricting the numbers of deliveries and servicing** There shall be no more than 56 two-way trips over a 24-hour period (targeting 50% consolidation). Deliveries on foot and cargo bike are not restricted.

	REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.
61	**Blue Badge Car Parking Spaces** Before any works affected are begun, details at a scale of no less than 1:20 of the two car parking spaces suitable for uses by people with disabilities to be provided on Water Lane (including the location of dropped kerbs and protection zones) shall be submitted to an approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with those details, and such parking spaces shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking. REASON: To ensure the provision of suitable parking for people with disabilities in accordance with policy DM16.5 of the Local Plan.
62	**Refuse/Recycling Storage and Collection** Refuse and recycling, storage and collection facilities shall: (a) Be provided within the curtilage of the site to serve each part of the development in accordance with details that must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and (b) Thereafter be maintained as approved throughout the lifetime of the development. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1, DM 16.5. 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
63	**Pedestrians only on the quayside** No part of the quayside shall be accessed by vehicles or cyclists (other than in the case of vehicle access for events in the quayside activation areas, an emergency, repair and maintenance and or cleaning of the building or quayside) unless specifically approved for that purpose pursuant to the Delivery and Servicing Management Plan. REASON: To protect the visual amenities of the area and reduce commuting by car in accordance with the following policies of the Local Plan: DM10.1 and DM16.5.
Access and Inclusivity	

64	**Signage and Wayfinding** Before any works affected are begun, an inclusive signage and wayfinding strategy highlighting and signposting destinations, accessible routes and facilities, cycle parking, cultural uses, quayside, food and beverage uses, spa and health centre, toilets and any other relevant uses or historic sites shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out in accordance with the approved details. REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4
65	**Inclusion and Accessibility** 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 development shall be carried out in accordance with the approved details for the lifetime of development: (a) Details at a drawing scale of no less than 1:20 of all lifts to include, door opening widths and material contrast, car dimensions, floor surfaces, internal and external control points and communication systems. (b) Details of the ramp surface material, slip resistance and tactile paving to the quayside ramp and terrace. (c) Details at a drawing scale of no less than 1:20 and with details at 1:5 of the proposed external steps, and entrance slopes to the south elevation of the building including, landings, terrace walls and handrails, surface materials' slip resistance, tread end details, visual contrast, tactile paving and guard rails as required (d) Details of clear opening widths for doors on internal and external access routes including automation or dimension to the leading edge and opening force, as relevant (e) Details of seating in the quayside to ensure that options for seating include single, aligned and group facing seating, seating at a range of heights, and with options for backrests and arms for support when rising, and for wheelchair users to transfer to sit alongside companions. (f) Details at a scale of no less than 1:20, showing a detailed layout and specification, surface details and lighting of the Changing Places facilities. The Changing Places facility shall be fully fitted out and operational prior to occupation. (g) Details at a scale no less than 1:20 showing the location, layout and details of accessible shower and changing facilities for the basement spa/health centre.

	(h) Details of all accessible toilet provision (all wheelchair and ambulant accessible and universal provision), including layout and options for right and left-handed transfer as relevant, at a scale of no less than 1:20. (i) Details including a section at drawn scale of no less than 1:5 of threshold for the external terraces at ground and first floor and the courtyards. (j) Details of the 10% of wheelchair accessible hotel rooms, including layout and location at a scale of no less than 1:20. Include details of door automation where 300mm to the leading edge or opening force to meet building regulations as set out in Approved Document 2 paragraph 2.13 cannot be achieved. (k) Details of suitable passing places for wheelchair users at reasonable intervals on internal corridors (l) Details of the Quiet Spaces/Rooms (including details of the 1(no.) room would be available for children as a family room), to be provided across the East and West Wings. REASON: To ensure the development proposals provide a fully accessible and inclusive facility in accordance with policy DM10.8 and policy D5 of the London Plan.
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. (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.
67	**Public Route Hours** The Ground Floor public route shall be accessible without restriction to members of the public during the opening hours of the food and beverage uses at ground floor level for the lifetime of the development. REASON: To ensure that development provides and fully accessible and inclusive facility in accordance with Policy DM10.7 of the Local Plan and Policy D5 of the London Plan.
68	**Public Access and Toilets** The toilets at ground floor and basement level including the Changing Places facilities shall be accessible without restriction to members of the public during the opening hours of The Galleries, Engagement Space and Cultural Café or food and beverage uses at ground floor level, whichever is later, for the lifetime of the development. REASON: To ensure that development provides and fully accessible and inclusive facility in accordance with Policy DM10.7 of the Local Plan and Policy D5 of the London Plan.
	Security and Safety
69	**Security** Before any works thereby affected are begun, details of security measures to be utilised within the development, having been developed in consultation with City Police, including but not limited to natural surveillance, CCTV, lighting, secure lines, entrances and secure access control, compartmentalisation of different areas of the building, anti-scaling and safety measures, shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development. REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.
70	**HVM** The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of these protection measures, accompanied by a Couter Terrorism Risk Assessment and Vehicle Dynamics Assessment must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

	REASON: To ensure that the premises are protected from road vehicle borne damage within the site, and that any proposed protection measures are of a high quality design which does not negatively impact on the quality of the public realm, in accordance with the following policy of the Local Plan: CS3 and DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
71	**Life Saving Equipment** Prior to the relevant works a scheme shall be submitted to the Local Planning Authority, to demonstrate the provision of appropriate Riparian Life Saving Equipment (such as grab chain and lifebuoys) within the site and adjacent to the river for the lifetime of the development. REASON: In the interest of public safety and to comply with the Riverside Walkway Enhancement Strategy SPD (2015).
	Fire
72	**Fire Safety** The development shall be carried out in accordance with the approved details within the Fire Statement Reference: 14005 - 006 prepared by NDY and dated 31 January 2025. Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan policies D5 and D12.
	Other
73	**Uses** The development shall provide (all figures GIA and excluding plant): - 17,745sqm (GIA) of hotel floor space (Use Class C1). - 1,599sqm (GIA) of basement spa and health centre (Use Class E(d)) - 1,993sqm (GIA) of ground floor food and beverage, public north/south route, gallery and events space (Use Class Sui Generis) REASON: To ensure the development is carried out in accordance with the approved plans.
74	**Hotel Use** The area shown as hotel floor space and as set out in Condition 73 of this decision notice, shall be used for those purposes only and for no other purpose of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.

	REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed and that public benefits within the development are secured for the life of the development.
75	**Spa and Health Spa Use** The area shown as spa and health centre floorspace and as set out in Condition 73 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed and that public benefits within the development are secured for the life of the development.
76	**Ground floor, food and beverage, public north/south route, gallery and events space Use** The ground floor, food and beverage, public north/south route, gallery and events space floorspace and as set out in Condition 73 of this decision notice, shall be used for those purposes only and for no other purpose of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed and that public benefits within the development are secured for the life of the development.
77	**Terraces** The outside terraces at ground floor level shall be used only as ancillary seating spaces associated with the ground floor food and beverage uses and shall not be used as hotel events space. 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.
78	**Tables and Chairs Plan**

	Prior to occupation of the development, a plan showing the locations of where tables and chairs are to be situated in 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
79	**Public Access to the Quayside** Unrestricted public access to the quayside shall be provided 24 hours a day, 365 days a year and there should not be any private events, ticketed events, barriers, or corrals within the quayside. REASON: To ensure that the unrestricted public access to the quayside is provided and in accordance with policies CS19 and DM19.1 of the Local Plan and emerging City Plan 2040 policies S14, S17 and OS1.
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. 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.
	Approved Plans
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-D-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 CUH-ORM-ZZ-ZZ-DR-A-12354 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12355 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12356 Rev C01 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 CUH-ORM-ZZ-00-DR-A-12820 Rev C01 CUH-ORM-ZZ-00-DR-A-12830 Rev C01 CUH-ORM-ZZ-00-DR-A-12850 Rev C01 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 CUH-ORM-ZZ-ZZ-DR-A-12400 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12401 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12402 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12403 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12404 Rev C01 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-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.

Informatives

1	**NPPF** In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways: detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available; a full pre application advice service has been offered; where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
2	**CIL** The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019. The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone: Office 185GBP per sq.m Retail 165GBP per sq.m Hotel 140GBP per sq.m All other uses 80GBP per sq.m These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

	The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses. The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City. Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil). Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.
3	**Thames Water – Waste** Thames Water advises: There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities or inhibit the services we provide in any other ways. The applicant is advised to read our guide for working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes
4	**Thames Water – Sewage Flood Prevention** Thames Water advises: As required by Building Regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positively pumped devise (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will

	be undertaken to minimise groundwater discharge into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effulent@thameswater.co.uk
5	**Thames Water – Water Pressure** Thames Water advises: Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
6	**Thames Water – Water Mains** Thames Water advises: There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes
7	**Thames Water** Thames Water advises: The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read out guide 'working near our assets' to ensure your workings are in line with necessary processes you need to follow if you're considering working above or near our pipes or other structures.
8	**Historic England – GLAAS** GLAAS advises: The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
9	**Environment Agency – Flood Risk Activity Permit**

	The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culvert including any buried elements (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission. For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 4422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.
10	**Environment Agency – Flood resistance and resilience** The Environment Agency advises: We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage. To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in: Government guidance on flood resilient construction https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings CIRIA Code of Practice for property flood resilience https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.as px British Standard 85500 – Flood resistant and resilient construction https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686
11	**Environment Agency – Water Resources** The Environment Agency advises: Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources.

	Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures in all developments, particularly in 6 those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.
12	**Environment Agency – Signing up for flood warnings** The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit https://www.gov.uk/sign-up-for-flood-warnings. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up. Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities. For practical advice on preparing for a flood, visit https://www.gov.uk/prepare-for-flooding To get help during a flood, visit https://www.gov.uk/help-during-flood For advice on what do after a flood, visit https://www.gov.uk/after-flood
13	**Flood Risk Activity Permit** The applicant is reminded that they will need to secure a Flood Risk Activity Permit from the Environment Agency prior to the commencement of any works.
14	**Compliance with the Clean Act 1993** Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.
15	**Generators and combustion plant**

	Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)
16	**Highway Authority** 1. This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as the Highway Authority; and works on the public highway must not be commenced until the consent of the Highway Authority has been obtained along with relevant licences and legal agreements. 2. Works to the public highway, are undertaken via a Section 278 Agreement. It forms part of a separate process along with associated fees. The planning permission hereby granted does not authorise these works to be carried out without the necessary agreement, approvals and relevant highways licences. 3. A stopping up order is a legal process under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at: https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways. The application form should be submitted to: transport.planning@cityoflondon.gov.uk 4. You are advised to comply with the New Roads and Street Works Act 1991 and notify the Street Authority of any proposed works in accordance with the Act. 5. The City Operations (Highways Management & Maintenance) must be consulted on the following matters which require specific approval: a. Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works, including temporary crossovers. Information can be found at: Highway licences - City of London b. The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City

		brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the City Operations is recommended to ensure the design of the building provides for the inclusion of street lighting. Information can be found at: deshighwaysupport@cityoflondon.gov.uk c. The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). Information on projection licences can be found at: Bridges and highway structures - City of London You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner to secure the air space. Please contact the Corporate Property Officer, City Surveyor's Department at: district.surveyor@cityoflondon.gov.uk d. Bridges over highways, approval for moving an abnormal load through the City of London is required prior to operations. Your proposal must include your intended route and should be emailed to the Bridges team at bridges@cityoflondon.gov.uk. Allow at least three working days for us to process your application.
17	**WLCA** The post-construction Whole Life Carbon Assessment should be submitted to the GLA along with any supporting evidence as per the guidance no later than three months post as-built design completion: ZeroCarbonPlanning@london.gov.uk Applicants are strongly encouraged to also submit the WLCA to the Built Environment Carbon Database (BECD). This is to allow for evidence collection and monitoring to support the reduction of whole life carbon emissions in the Local Planning Authority and Greater London.	

Committee	Date:
Planning Application Sub-Committee	9 September 2025
Subject: Custom House, 20 Lower Thames Street and River Wall, Stairs and Crane, Custom House Quay, London, EC3R 6EE. 25/00271/LBC: 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**

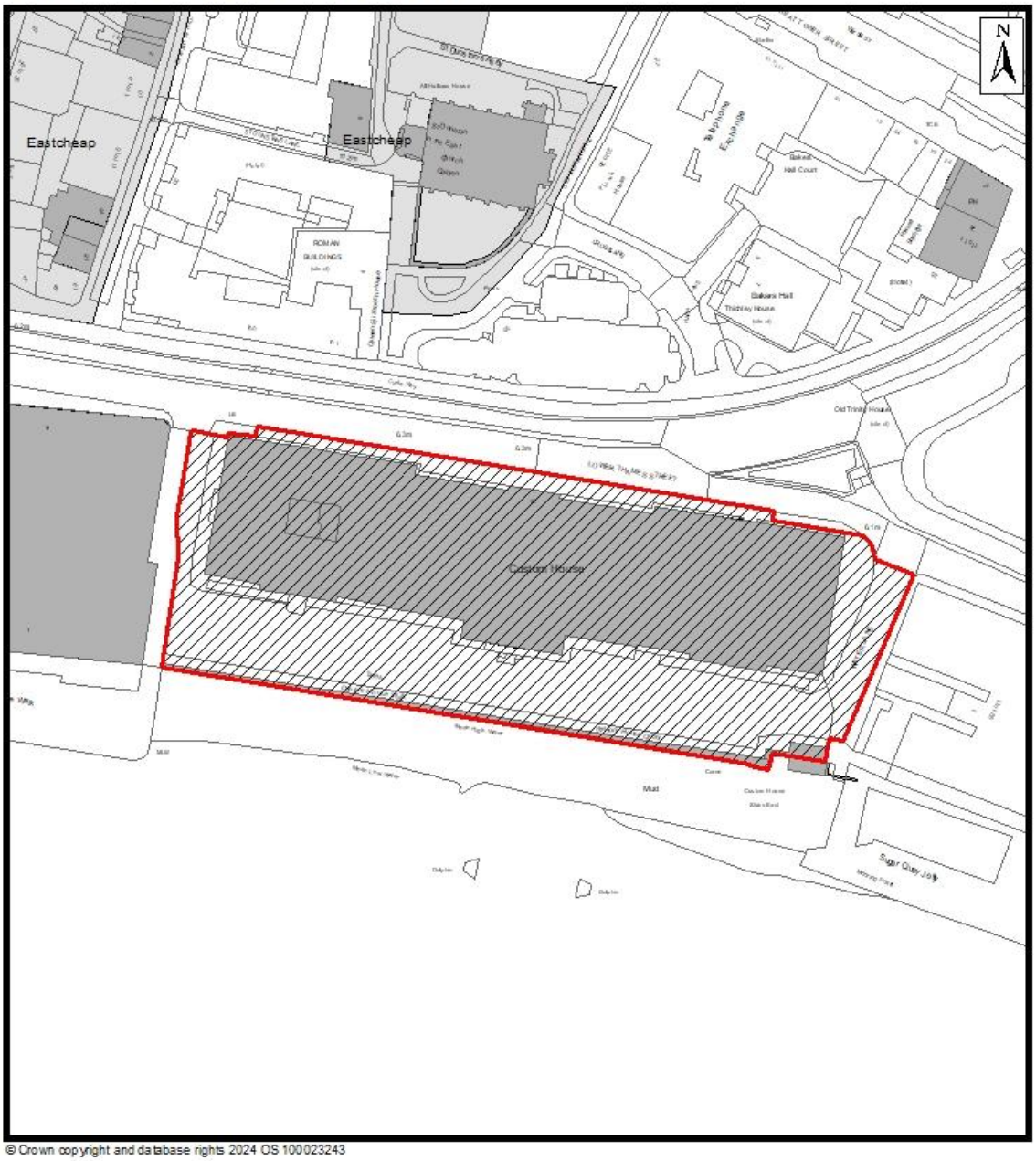
Registered No: 25/00271/LBC	**Registered on:** 19 March 2025
Conservation Area: No	**Listed Building:** Grade I
Reason the application is before committee: The application is being determined by PASC as it is considered to be in the broader public interest.	

Recommendation

I. That the Planning and Development Director be authorised to issue a decision notice granting Listed Building Consent for the above proposal in accordance with the details set out in the attached schedule.

Site Location Plan

Site Location Plan



© Crown copyright and database rights 2024 OS 100023243

ADDRESS:
Custom House, Lower Thames Street

CASE No.
25/00271/LBC

SITE LOCATION
LISTED BUILDINGS
CONSERVATION AREA BOUNDARY
CITY OF LONDON BOUNDARY

CITY OF LONDON
ENVIRONMENT DEPARTMENT

Page(s) for site photos

Main Report

1. Please refer to committee report for 25/00270/FULMAJ.

Background Papers

2. Please refer to the background papers listed in the committee report for 25/00270/FULMAJ.

Appendix A – Policy

Relevant London Plan Policies

Policy HC1 Heritage conservation and growth

Policy HC3

Emerging City Plan 2040 Policies

Emerging Strategic Policy S11: Historic Environment

Emerging Policy HE1: Managing Change to Historic Environment Development

Local Plan 2015 Policies

CS12 Conserve or enhance heritage assets.

To conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting

SCHEDULE

Application: 25/00271/LBC

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.

Conditions

1	**Time Limit** The works hereby permitted must be begun before the expiration of three years from the date of this consent. To ensure compliance with the terms of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
2	**Matching Materials** All works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. 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.
3	**Demolition**

	The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur or be necessary. To ensure the stability of the structure to be retained in accordance with the following policy of the Local Plan: DM12.3.
4	**Structural Condition** Prior to the commencement of the relevant structural works thereby affected, a Structural Condition and Implementation Strategy, produced by a conservation-accredited engineer(s), shall be submitted to and approved in writing by the LPA and the works undertaken in accordance with the approved details. The Strategy may be provided in phases corresponding to the affected areas of works This should include: A. Details of opening up for structural investigation to understand and inform detailed structural designs. B. Details of opening up for structural investigation to understand and inform detailed structural designs. C. Demonstrate structure is capable of receiving intended loads through investigation and testing D. A structural design showing the impact of the service trench works on the historic fabric below basement level. E. A structural design showing the builders work penetrations through the existing vaulting. F. structural design showing the King's Warehouse and Long Room, plus a detailed strategy for timber floors more generally. G. Details of any scaffolding and fixing to the listed building where necessary. REASON: to ensure the special interest of the listed building in accordance with CS 12, DM12.1, DM 12.3.
5	**Hidden Historic Features** During work if any hidden historic features of interest are revealed these should be retained-insitu. If new features are uncovered, work should be halted in the relevant area of the building and the council informed immediately. Failure to do so may result in unauthorised works being carried out and an offence being committed. 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.
6	**Building Recording** Prior to the commencement of relevant works, proposals shall be carried out in accordance with the gazetteer, condition survey and photographic record of historic features submitted as part of the application. Any variations in conditions, or additional features uncovered during the works, or changes to repair and or re-location strategy shall be agreed in writing with the local planning authority prior to their alteration or removal.

	REASON: To ensure that the Local Planning Authority may be satisfied that the works would preserve the special architectural and historic interest of the listed building in accordance with CS 12, DM12.1, DM 12.3.
7	**Sample Facade Bays** Before the works thereby affected are begun, sample panels of agreed sections of the facades including, east wind courtyard, west wing courtyard and quayside terrace shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2.
8	**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 Bllingsgate ramp and steps specifying railings and technical compliance delivering a gradient of a ‘gentle slope’ as appropriate. C. Drawn details to 1:20 showing full internal elevations, fit-out, plans and sections to: Entrance Hall (new doorway to King’s Warehouse) Kings Warehouse including retained and relocated timber screens, Long Room, Long Room Lobby, Robing Room, Entrance Hall from Lower Thames Street, Tidewaiters, Café, Gallery, West Wing Corridor, Central Wing Corridor, 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 showing 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 show 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 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.
9	**Materials** 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) Particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces, east and west courtyards, including sample panels of all new stonework, brickwork, ironmongery and joinery; B) Particulars and samples of the materials to be used on all external faces of the quayside including Old Billingsgate Lane, the Quayside, Water Lane, Lower Thames Street and listed river wall and steps. A) Particulars and samples of material finishes to be used on floors, walls and fenestration in the Entrance Hall from Lower Thames Street, Kings Warehouse, Robing Room, Long Room, Ground Floor Café and Gallery Spaces, Staircases, a typical bedroom in the east and west wings spa & swimming pool area. C) Full details and technical specification for any new glazing including, opacity, colour, reflectivity, profile, fixings and depth. 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.
10	**Services** 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) Details of all new ductwork and typical risers including additional structural intervention required to accommodate these and any associated penetrations (wall, ceilings), including associated grills, including with regards to the a typical east wing and west wing bedroom, Café, Swimming Pool, Spa, Long Room and Kings Warehouse.

	B) Full details of swimming pool and all associated plant, including any tanking, cleaning, heating, venting and maintenance requirements.
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, commemorative and brass plaques lanterns, granite setts, historic crane, all stonework and historic joinery including all doors and timber and glazed panelling to Kings Watehouse. 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.
12	**Facade Cleaning** 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) Full details including methodology and technical specification for all façade cleaning and repair. No cleaning of masonry, other than low pressure (20-100 psi) surface cleaning using a low pressure water spray is authorised by this consent without the prior approval of the Local Planning Authority. Before work begins, any other cleaning proposals must be approved in writing and carried out strictly in accordance with those details. At the commencement of the cleaning, a test panel shall be undertaken in an inconspicuous position and the method recorded to the approval of the Local Planning Authority. B) Before work begins, a method statement showing how the cleaning will conform to BS 8221-1:2012 (Code of practice for cleaning and surface repair of buildings. Cleaning of natural stone, brick, terracotta and concrete) must be agreed and approved in writing by the Local Planning Authority. Cleaning shall be implemented strictly in accordance with the statement. 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.
13	**Lighting** Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: A) lighting layout/s; B) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure); C) a lighting control methodology;

	D) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; E) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; and F) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. 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-D-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 CUH-ORM-ZZ-ZZ-DR-A-12354 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12355 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12356 Rev C01

	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 CUH-ORM-ZZ-00-DR-A-12820 Rev C01 CUH-ORM-ZZ-00-DR-A-12830 Rev C01 CUH-ORM-ZZ-00-DR-A-12850 Rev C01 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 CUH-ORM-ZZ-ZZ-DR-A-12400 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12401 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12402 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12403 Rev C01 CUH-ORM-ZZ-ZZ-DR-A-12404 Rev C01 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-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.

This page is intentionally left blank

Memo

To Department of Planning & Transportation

From Paul Jones
City Operations Division
Environment Department
Telephone [redacted]
Email [redacted]

Date 03 April 2025

Subject GREASE TRAP REQUIREMENT

For action

Application –PT_GM/25/00270/FULMAJ

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

Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals for the above planning application, need to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being;

ANY BUILDING PROPOSAL WHICH INCLUDES CATERING FACILITIES WILL BE REQUIRED TO BE CONSTRUCTED WITH ADEQUATE GREASE TRAPS TO THE SATISFACTION OF THAMES WATER UTILITIES LTD OR THEIR CONTRACTORS.

I would be obliged if you could incorporate this in your response to the planning department, regarding this application.

Paul Jones

Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department
Telephone [redacted]
Email [redacted]

Date 9 April 2025
Our Ref DS/FS25/0016
Your Ref PT_GM/25/00270/FULMAJ
Subject Custom House 20 Lower Thames Street & River Wall, Stairs And Cra
Custom House Quay London EC3R 6EE

In response to your request for comments in relation to the submission the District Surveyors Office has the following comments to make:

I have reviewed the submitted information and have no comments:

I consider that policies D5 and D12 have been met.

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk

From Ms Joanne Grimley
Environmental Health Officer
Environment Department
Telephone [redacted]
Email [redacted]

Date 16th April 2025
Our Ref 25/02479/NPLN
Your Ref 25/00270/FULMAJ

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

RE: 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.

This department acknowledges receipt for the above application and has the following comments and observations to make.

Use and Hours of Use Control

I4C No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance 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.

No music audible outside the premises

I11C No live or recorded music that can be heard outside the premises shall be played.

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.

Roof Terrace Hours

I26 The roof terraces, namely Long Room Terrace (First Floor), Quayside Terrace (External) and West Wing Courtyard hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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.

Roof Terrace Music

I27 No amplified or other music shall be played on the roof or ground level terraces.

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.

To keep windows/doors closed

I19C Unless otherwise approved by the Local Planning Authority the doors and windows to any bar or restaurant on the North, South and East frontages 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.

Noise from plant

M7D (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the worst affected noise sensitive premises (see informative). The background noise level shall be expressed as the lowest typical LA90 (15 min) during which time plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant shall be taken (unless otherwise agreed in writing by the local planning authority) and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To ensure that the proposal meets the requirements of the Agent of Change principle, and that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3, DM15.7, D21.5 and London Plan Policy D13.

Demolition and Construction

M10F There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

M11G There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

Fumes from Use Class E affecting offices or residential

M18D Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Sui Generis(Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use takes place.

REASON: *In order to protect residential/commercial amenities in the building in accordance with the following*

policies of the Local Plan: DM15.6, DM15.7, DM21.3.

Noise and vibration from mechanical systems or other plant

M19C Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: *In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.*

Residential Noise Levels

M14D All residential premises, including hotel accommodation, in the development shall be designed and constructed to attain the following internal noise levels:

Bedrooms- 35dB LAeq (07:00-23:00) , 30dB LAeq,T and 45dB LAmax not to be exceeded more than 10 times per night), *T- Night-time 8 hours between 23:00-07:00*

Living rooms- 35dB LAeq, T , *T- daytime 16 hours between 07:00-23:00.*

A report detailing the sound insulation properties of the building envelope shall be provided and shall include the specification and acoustic data sheets for glazed areas of the development and any complementary acoustic ventilation scheme. Where external noise levels exceed WHO guidelines then provision of acoustic ventilation will need to be considered. A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any relevant part of the building.

REASON: *To ensure that the proposal meets the requirements of the Agent of Change principle and that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3, DM15.7, D21.5 and London Plan Policy D13.*

Hours of Servicing

I18C No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: *To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3*

Light

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036

Fumes from Use Class A affecting the area

No cooking shall take place within any A5 Sui Generis(Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) unit hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

Commercial Kitchen Drainage

Drainage serving commercial kitchens within this development shall be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825- 2:2002 or other effective means of grease removal. The details of the grease separator shall be provided to the planning authority prior to the operation of the kitchen. The grease separator shall be retained and kept in serviceable condition so long as the commercial food use continues.

REASON: *To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8*

Regards

[redacted]

Joanne Grimley
Environmental Health Officer
Pollution Team
Environment Department
City of London Corporation
Mob: [redacted]

MEMORANDUM

To Georgia McBirney

From City Gardens
My reference
Your reference 25/00270/FULMAJ
Being dealt with by Alex Roebuck
Telephone [redacted]
Date 17 April 2025

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.

The proposals have the potential to cause harm to the trees at the site. In particular the large and very high amenity value London plane trees at the Custom House frontage referred to in the tree report as T1-T13. These trees are subject to a Tree Preservation Order (TPO) and have been predominantly categorised within the tree report as category A trees of high quality.

No information of any trial investigations to assess the presence of tree roots on the site where works are proposed has been provided.

An Arboricultural Impact Assessment (AIA) has been provided by Tyler Grange.

Given the extent of works proposed within the root protection areas (RPAs) of the TPO plane trees. Further AIA details and a draft Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) in accordance with BS5837 should be provided at this stage to ensure the proposals can be carried out without causing damage or tree loss, and that where design changes are necessary these are raised as early as possible in the process. The AMS and TPP should provide detail

particularly on the groundworks, engineering solutions and tree protection measures that are proposed within the RPAs.

The RPAs are currently unmodified, whilst this is acknowledged in the report it does not seem likely that tree roots are growing beyond the river wall into the river. The RPAs should be curtailed at least to the wall edge and extended further north into the site. Currently the impacts and RPA incursions presented in the report are likely to be under estimated and will be of greater significance.

Impacts to trees – demolition

3.9 - A number of the plane trees appear to have large structural roots at surface level which are breaking up through the existing tarmac. It should be clarified how these will be dealt with and incorporated into the proposed repaving and what the overall change in levels will be. Also, what the new type of paving and subbase/preparation to be used is and the method of removing the existing surface.

Impacts to trees – construction

3.14 – the proposed above ground solution should be specified at this stage along with confirmation of feasibility by the relevant specialist including what excavation, footings and level changes may be required. Where screw piles are proposed the number, location, depth and diameter should be specified and confirmation given by the relevant specialist that they are feasible in this location.

3.15 – confirmation is required of the details, materials and construction requirements of the proposed tree pit alterations and if any soil improvement measures are actually to be undertaken and to what specification.

3.16 – What are the proposed level changes and build up and how will tree roots at surface level will be dealt with and accommodated into the proposals.

3.18 - Where screw piles are proposed the number, location, depth and diameter should be specified and confirmation given by the relevant specialist that they are feasible in this location including tolerance for relocation if significant roots which cannot be severed are encountered.

3.19 – The proposed foundation type, location and construction requirements for the crane to be installed within the RPA of T8 should be specified.

Drainage

3.21 – the proposed drainage in RPAs has the potential to cause significant harm to the existing trees. Particularly for T1 where four runs appear to be proposed in the RPA and in very close proximity to the tree trunk. On initial assessment it does not seem to be possible to install these so close to the tree without causing excessive and unacceptable damage. Particularly next to T1, alternative locations or configurations to avoid installation so close to the tree will need to be looked at.

It should be confirmed what the depth and diameter of the proposed drainage is and if the directional drilling method proposed here can be achieved without causing harm to the plane trees.

Tree protection

The tree report recommends that AMS and tree protection details are secured by condition. However I suggest that A draft AMS and TPP is required at this stage to demonstrate feasibility, with further detail being required throughout the process which could be left to conditions.

These should include but not limited to site sequencing, which will require careful phasing and potentially a staged approach to tree protection, specific engineering solutions to be used and how the trees and RPAs will be protected during the demolition and construction process. Including specification of the type and location of fencing, ground protection, stem protection and a schedule of auditable arboricultural monitoring.

Regards,

Alex Roebuck
Arboricultural Projects Officer

From: Varma, Vimal <[redacted]
Sent: 11 May 2025 21:41
To: McBirney, Georgia <[redacted]
Cc: Turner, Lee <[redacted]>
Subject: 25/00270/FULMAJ - Custom House 20 Lower Thames Street

Hi Georgia,

The proposed waste storage and collection facilities indicated on Drawings No. CUH-ORM-ZZ-00-DR-A-12200 Rev C01 and CUH-ORM-ZZ-B1-DR-A-12249 Rev C01 and as outlined in the Delivery, Servicing and Waste Management Plan, Feb 2025, are adequate for this proposal. Therefore, this division, will not raise any objection to this application.

Please note: the minimum headroom where the refuse vehicle will pass is to be 4.5m.

Thanks

Vimal

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 01 April 2025 11:51
To: Varma, Vimal <[redacted]>; Turner, Lee <[redacted]
Subject: Planning Application Consultation: 25/00270/FULMAJ

Dear Sir/Madam

Please see attached consultation for Custom House 20 Lower Thames Street & River Wall, Stairs And Crane Custom House Quay London EC3R 6EE.
Reply with your comments to HYPERLINK "mailto:PLNComments@cityoflondon.gov.uk" PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Georgia McBirney
Environment Department
City of London

Memo

To Assistant Director (Development Management)
Environment Department
Email plncomments@cityoflondon.gov.uk

From Paul Bentley
Air Quality Officer
Telephone [redacted]
Email [redacted]

Date: 15/07/2025
Your Ref: 25/00270/FULMAJ

Subject: Custom House, 20 Lower Thames, 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.

The application is for the redevelopment of the existing building, changing the current use of office to a hotel led building with a health centre and hospitality elements.

The assessment of vehicle emissions from the construction and operational phases has been scoped out due to the predicted increase in traffic being lower than the IAQM/EPUK best practice guidance assessment levels. As part of the development over 100 existing car parking spaces are to be removed which is welcomed. The development is ‘car free’, with two blue-badged parking spaces, and servicing vehicles will be the only vehicle movement associated with the development. A Delivery and Servicing Plan has been submitted as part of the application.

The development is air quality neutral, as per GLA guidance, with the development being ‘car-free’ and the heating and cooling demand provided by air source heat pump technology. It should be noted that emissions from service and delivery vehicles and emergency life-safety backup power generation are excluded from Air Quality Neutral assessments.

The development has proposed the installation of a single backup diesel generator. The technical specification for the proposed generator is not known at this stage therefore

further details will be required. Additionally, it is stated within the AQIA that the generator will provide a level of business continuity rather than solely life-safety provisions. Due to this a revised Air Quality Neutral assessment will be required. Aside from a brief statement regarding UPS, alternatives to the diesel generator for emergency power supply have not been explored, therefore an assessment of alternatives will need to be completed. If installed, the generator should be fitted with mitigation, such as SCR, to reduce NOx emissions to comply with the City of London Air Quality SPD and only tested only in-line with manufacture guidance.

Should the development be approved please attach the following conditions:

Condition M28C amended / Emergency Power Supply

Prior to the commencement of development, excluding demolition, details of the emergency power supply must be submitted to and approved by the local planning authority. Details must include an assessment of feasible fossil fuel free alternatives and confirmation of the proposed technology for the development. Where it is not possible to deploy alternatives, diesel generators must be the latest Euro standard available. Details of the appliance/plant must be submitted to and agreed by the LPA before installation. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose, and shall not be used at any other time.

Reason

To demonstrate that local air quality is maintained and operational carbon emissions have been minimised in accordance with Local Plan policies CS15, DM15.1, DM15.2, DM15.6, London Plan policies SI 1, SI 2, SD 4, and emerging City Plan 2040 policies S1, HL2, S8, DE1.

Air Quality Neutral Assessment
Prior to the installation of any generator to be used for any purpose outside of emergency life-safety, a revised Air Quality Neutral assessment that considers the building emissions must be submitted. The assessment must follow the latest Air Quality Neutral guidance.

Reason
In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

Condition M29

Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure

maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

Reason

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

Condition M32 NRMM
Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason
To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Compliance with the Clean Air Act 1993
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Generators and combustion plant
Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

MEMORANDUM

Planning case officer Georgia McBirney

From City Gardens
My reference
Your reference 25/00270/FULMAJ
Being dealt with by Alex Roebuck
Telephone [redacted]
Date 15 July 2025

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.

An updated tree report had been provided and has confirmed that the foundations for the entrance area and steps will require an in-ground foundation whereas previously an above ground solution was specified. The proposed mitigation for this is to carry out ground investigations through radar surveys and or trial trenches to inform foundation locations. Further measures are suggested in the event of large roots being found including a cantilevered design or relocation of foundations further northward.

These investigations should be carried out at this stage to demonstrate that the foundations can be constructed within the root protection area (RPA) of the TPO plane trees, without causing unacceptable damage to tree roots. The extent of any tree roots in this location is currently an unknown, any alternative design or mitigation measure that is currently proposed is entirely dependant on the outcome of the ground investigations.

A trial trench in the proposed extent of the foundation location would be preferable to radar scans, as these can be inaccurate. This should clearly demonstrate the

presence or absence of tree roots to a minimum depth of 600 mm. We would be open to discussions on an exact specification and location.
If the trial excavations can demonstrate that the foundations could be installed in this location without damaging tree roots, we consider that although a number of concerns do exist around the amount of work proposed within RPAs across the site, this could be dealt with as part of an arboricultural method statement and foundation design condition for the proposed entrance area.

Regards,

Alex Roebuck
Arboricultural Projects Officer



From: Grimley, Joanne <[redacted]>
Sent: 16 July 2025 09:14
To: McBirney, Georgia <[redacted]>
Cc: McCallum, Kieran <[redacted]>; Grierson, John <[redacted]>
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Good morning Georgia,

Apologies for my oversight. Considering the excavation, I would recommend the following condition is added:

Contaminated Land

Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. 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.

Kind Regards
Jo

Jo Grimley | **Environmental Health Officer – Pollution Team**
Mobile: [redacted] | Switchboard: 020 7606 3030
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk
-
Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 – 5:00pm and Friday mornings 09:00 – 2:00pm.

From: McBirney, Georgia <[redacted]>
Sent: 15 July 2025 16:55
To: Grimley, Joanne <[redacted]>
Cc: McCallum, Kieran <[redacted]>; Grierson, John <[redacted]>
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Jo,

Hope you are well.

Further to the attached conditions that you provided in relation to application 25/00270/FULMAJ Custom House, would any conditions be required in relation to Land Contamination as the existing vehicle ramp is proposed to be replaced by a vehicle lift and this would result in some excavation.

Kind regards

Georgia McBirney (she/her)
Planning Officer

(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From 16th July returning on 21st July
From the 15th September returning on 29th September



From: Grimley, Joanne <[redacted]>
Sent: 16 April 2025 14:53
To: McBirney, Georgia <[redacted]>
Cc: PLN - Comments <[redacted]>
Subject: FW: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Good afternoon,

Please see comments attached from the Pollution Control Team in respect of this application.

Kind Regards

Jo

Jo Grimley | **Environmental Health Officer – Pollution Team**
Mobile: [redacted] | Switchboard: 020 7606 3030
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk
-
Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 09:00 – 5:00pm and Friday mornings 09:00 – 12:30pm.

From: Enterprise for Uniform <[redacted]>
Sent: 01 April 2025 11:57
To: DES - EH - Pollution <[redacted]>
Subject: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

NEW SERVICE REQUEST RECEIVED

SERVICE REQUEST TYPE: Planning Consultation
REFERENCE: 25/02479/NPLN
DATE/TIME RECEIVED: 01/04/2025 11:49:00
ORGANISATION: 20 Lower Thames Street
ADDRESS: Custom House 20 Lower Thames Street London EC3R 6EA

COMPLAINANT

NAME:
ADDRESS:
EMAIL:
PHONE:
MOBILE:

DETAILS: Date 1 April 2025 Our Ref PT_GM/25/00270/FULMAJ Subject Custom House 20 Lower Thames Street & River Wall, Stairs And Crane Custom House Quay London EC3R 6EE An application has been received for: 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.

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone [redacted]
Email [redacted]

Date 4 August 2025
Our Ref DS/SUDS25/0023
Your Ref PT_GM/25/00270/FULMAJ
Subject Custom House 20 Lower Thames Street London EC3R 6EE

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the Flood Risk Assessment (Revision P06), Sustainable Drainage Strategy (Revision P05), and other relevant information for the above application and would recommend the following conditions should the application be approved:

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: greening, rainwater harvesting, rainwater pipework, design for water treatment, flow control devices, outfalls, arrangements for tidal locking, design for system exceedance, design for ongoing maintenance, design for avoiding inappropriate connections; all surface water shall discharge directly to the Thames, should this not be possible for limited areas, flow rates shall be restricted to as close to greenfield runoff rate as is feasible and for that area to discharge to the combined sewer with Thames Water's consent, provision should be made for an attenuation volume capacity capable of achieving this;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(c) Evidence that the relevant permits for discharging to the Thames have been acquired from the Port of London Authority and the Environment Agency.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:

- A full description of how the system would work, it's aims and objectives, the flow control arrangements and how inappropriate future connections will be avoided;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

APPLICATION COMMENT FORM

From: Ben Bishop, Environmental Resilience Officer

Application No: 25/00270/FULMAJ

Development Management Case Officer: Georgia McBirney

Site 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: 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.

Application Received: 21/02/2025

Request for Comment Received: 25/07/2025

Response issued: 07/08/2025

Comment:

Application submission documents relating to climate change resilience and adaptation have been reviewed, including the Sustainability Statement, Design and Access Statement (DAS), Flood Risk Assessment, Ecological Impact Assessment, Arboriculture Impact Assessment, Cultural Strategy and relevant site plans. The applicant has not targeted Wst05 and therefore has not completed the Climate Change Resilience Risk Assessment (CCRRS).

Overheating

- Wst05 is not targeted
- Heating, cooling and hot water will integrate Air Source Heat Pumps (ASHPs) utilising Fan Coil Units (FCUs) this will circulate and recycle heat within the building accordingly.
- Ventilation measures incorporated including central air handling units and local heat recovery
- Greening within the redline is limited, 15 trees retained providing public realm shading.

Flooding

- Flood zone 3. High from risk from fluvial and coastal flooding.
- Two systems provided for managing surface water to reduce surface water flood risk, system 1 incorporates rainwater harvesting tanks to temporarily store water until levels return to normal. System 2 drains external areas via overland flow directly into the River Thames.
- Proposed strategy is considered to provide a significant betterment.

APPLICATION COMMENT FORM	
Water stress - Development aims to achieve excellent standard for Wat 01 reducing overall potable water consumption by 40% via use of effective sanitary fittings - Metering to be installed to monitor operational water use. - Water leak detection system. - Grey and rainwater harvesting systems to be designed in accordance with BREEAM requirements. **Biodiversity** - UGF: < 0.3 (0.1 total following constraints analysis) - BNG: Applicant states that they fall below the de-minimis due to no impact to on-site habitats (15 trees that are large – very large) - Planting proposed falls inline with local flood risk approach, although should be reconsidered regularly to take into account any changes to future flood risk. **Pests and Diseases** - No consideration **Food, trade and infrastructure** - Circular Economy report provided - Sustainable transport considered - The applicant has supplied a Cultural Strategy which seek to activate the development. This includes: o Public ground floor route to improve access to the river. o Galleries o Café o Tidewaiters rooms offering library to academics, historians, researchers and students o Quayside activation, new permanent public realm space o New community space in the form of the Long Room (incl 24 free of charge bookable slots for community groups, charities and cultural organisations). - The above uses offer a range of facilities to promote community activity which could support improved outcomes for climate resilience.	
Recommendation: The proposed development **is not** compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2. The following condition should also be considered to provide details of how the development has responded to risks from climate change; this condition may be fulfilled by a satisfactory assessment in support of the BREEAM Wst 05 credit: *Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including*	**BB** 25/04/25

APPLICATION COMMENT FORM	
flooding, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to: solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development.	

From: Grimley, Joanne <[redacted]
Sent: 21 August 2025 12:07
To: McBirney, Georgia [redacted]; Smith, Alexander [redacted]>
Cc: McCallum, Kieran <[redacted]; Crossby, Siobhan [redacted]; Donal Rooney <[redacted]
Subject: RE: 25/02479/NPLN - Consultation - 20 Lower Thames Street Custom House

Hi Georgia,

As per their comment of the 8th August “the lift that would be installed would make the same level of noise irrespective on when it is used” so it they can achieve a noise level which is 10dBA lower than the existing background level at night, then they would by default achieve this during the day where the background level would be higher so I don’t think there is any value in time restricting the condition.

Many Thanks
Jo

Jo Grimley **| Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday mornings 09:00 –2:00pm.

From: McBirney, Georgia [redacted]>
Sent: 21 August 2025 10:40
To: Grimley, Joanne [redacted]>; Smith, Alexander [redacted]
Cc: McCallum, Kieran [redacted]; Crossby, Siobhan [redacted]; Donal Rooney <[redacted]>
Subject: RE: 25/02479/NPLN - Consultation - 20 Lower Thames Street Custom House

Hi Jo,

Hope you are well.

Do you have an update on the email below. I have to send the committee report to committee services on Tuesday so hoping to get this wrapped up with the applicant by the end of this week.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 15th September returning on 29th September
From the 3rd November returning on 17th November



From: McBirney, Georgia
Sent: 15 August 2025 15:57
To: Grimley, Joanne <[redacted]; Smith, Alexander
[redacted]
Cc: McCallum, Kieran <[redacted]; Crossby, Siobhan
[redacted]; Donal Rooney <[redacted]>
Subject: RE: 25/02479/NPLN - Consultation - 20 Lower Thames Street Custom House

Hi Jo,

Hope you are well.

In respect of the vehicle lift, they have come back with the below:

On the conditions relating to the lift, we are happy in principle to agree to these, however, please could you clarify that these only apply to overnight servicing? Can wording be included in the condition to make this clear?

I can go back with your response below, or do you want to add anything to this.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Advance Leave Notice:
From the 15th September returning on 29th September
From the 3rd November returning on 17th November



From: Grimley, Joanne <[redacted]>
Sent: 14 August 2025 15:34
To: McBirney, Georgia [redacted]>; Smith, Alexander
<[redacted]
Cc: McCallum, Kieran [redacted] ; Crossby, Siobhan
<[redacted]>; Donal Rooney <[redacted]>
Subject: RE: 25/02479/NPLN - Consultation - 20 Lower Thames Street Custom House

Hi Georgia,

Further to our telephone discussion, I confirm that we have reviewed that attached note regarding the activation area and we accept the recommended condition as detailed on page 4, which states:

"No live or recorded sound associated with the Quayside Activation Plan (when measured in terms of LAeq) should exceed the existing background noise level (LA90) by more than 5 dB at 1 m from any neighbouring noise sensitive receptor. Additionally, low frequency event noise (L10) should not exceed the background noise level by more than 5 dB in any 1/3 octave band between 40-160 Hz. No events within the activation areas in the Quayside, involving live or recorded sound (including PA systems) shall take place outside of hours 10:00 and 21:00, Monday to Sunday. Live or recorded sound shall only be played in one activation area at any one time. There shall be no more than a total of 40 events across both activation areas in a 12-month period."

I will await further comments from the applicant team on the basement lift before responding in full but as discussed, it is our view that the condition regarding the basement lift, and barrier would apply at all times of day and night. This could in fact be encapsulated in the condition relating to Noise and vibration from mechanical systems or other plant, but we have included it as a separate condition for clarity.

Many Thanks
Jo

Jo Grimley **| Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

-
Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday mornings 09:00 –2:00pm.

From: McBirney, Georgia [redacted]
Sent: 08 August 2025 17:33
To: Grimley, Joanne [redacted]; Smith, Alexander [redacted]
Cc: McCallum, Kieran [redacted]; Crossby, Siobhan [redacted]
Subject: RE: 25/02479/NPLN - Consultation - 20 Lower Thames Street Custom House

Hi Jo,

Hope you are well.

I forwarded the conditions suggested below to the applicant team, they are going to review these, but they provided the initial comment *' to clarify, these conditions don't explicitly reference overnight servicing? Our understanding and inference from your email below was that these conditions are to restrict overnight servicing, but as currently written, they would apply to the use of the lift at any time?*, I think we can pick this up when we actually get there comments on the suggested conditions, my only thought would be is surely the lift that would be installed would make the same level of noise irrespective on when it is used.

They have provided attached note in response to the suggested activation areas condition. Could you let me know your thoughts, happy to discuss as required.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 15th September returning on 29th September
From the 3rd November returning on 17th November



From: Grimley, Joanne [redacted]
Sent: 08 August 2025 12:21
To: McBirney, Georgia [redacted]; Smith, Alexander [redacted]
Cc: McCallum, Kieran [redacted]; Crossby, Siobhan [redacted]
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Georgia,

Thank you for your time this morning. As discussed, we are recommending two conditions in respect of the overnight deliveries. The first condition is an acoustic report, prior to commencement of works, asking them to demonstrate that noise levels from the basement vehicle lift and the entry / exit barriers shall be lower than the existing background level by at least 10 dBA.

The second condition is similar to our plant noise requirements. For reasons discussed, we have not incorporated this with the existing plant noise condition and would request it is added as a separate condition.

In response to the Applicant's comments in respect of overnight servicing, this department has the following comments and observations to make.

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional and operational methods to be used to demonstrate that noise levels from the basement vehicle lift and the barriers used to control vehicle entry and exit to the vehicle lift shall be lower than the existing background level by at least 10 dBA. The development pursuant to this permission shall be carried out in accordance with the approved scheme and maintained thereafter. *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.*

M7D	(a) The level of noise emitted from the basement vehicle lift and the barriers used to control vehicle entry and exit to the vehicle lift shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the basement lift, and barrier are or may be in operation. (b) Following installation but before the basement vehicle lift and entry /exit barriers comes into operation measurements of noise from the basement vehicle lift and associated barriers must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. (c) All constituent parts of the new basement vehicle lift and entry / exit barriers shall be maintained and replaced in whole or in part as often is required to ensure

compliance with the noise levels approved by the Local Planning Authority.
REASON: *To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.*

M19C Before any mechanical basement lift is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: *In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.*

As discussed, I don't work on Mondays or Tuesdays but if there is anything urgent at the beginning of next week, please can you copy Alex Smith and Siobhan Crossby in.

Many Thanks
Jo

Jo Grimley | **Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday mornings 09:00 –2:00pm.

From: McBirney, Georgia [redacted]
Sent: 08 August 2025 09:39
To: Grimley, Joanne <[redacted] ; Smith, Alexander <[redacted]>
Cc: McCallum, Kieran <[redacted]>
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Thanks, Jo.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]

Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 15th September returning on 29th September
From the 3rd November returning on 17th November



From: Grimley, Joanne <[redacted]>
Sent: 08 August 2025 09:11
To: McBirney, Georgia <[redacted]; Smith, Alexander
[redacted]>
Cc: McCallum, Kieran <[redacted]
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Georgia,

I will come back to you this morning on this.

Many Thanks

Jo

Jo Grimley | **Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday mornings 09:00 –2:00pm.

From: McBirney, Georgia <[redacted]
Sent: 06 August 2025 13:38
To: Grimley, Joanne <[redacted]>; Smith, Alexander
[redacted]
Cc: McCallum, Kieran <[redacted]>
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Jo,

Hope you are well.

Further to the email chain below and our discussions, please find below the applicant teams' response to the request for further information about the vehicle lift. Could I have your view on the below, happy to discuss as required. Please note that I haven't come back yet on the condition about music/activation areas.

With respect to overnight servicing, I can provide some further clarity/comment in relation to the lift:

The location of the lift, adjacent to the River Thames and Quayside, mean that there will already be ambient noise given the local environment.

The type of lift is still to be determined, however, we are looking at using a Rigid Chain Technology (RCT) lift which will probably have 4 gearboxes mounted and operating from within the pit. These gearboxes will be located significantly below the street level entrance, so it is likely that there will be limited opportunity for noise from the lift breaking out into the public domain above.

During operation of the lift, it will rise out of the ground but clearances around the cabin will be relatively small for noise breakout. Our understanding is that RCT operating at slow speeds generates very little mechanical noise within the chain drive units themselves and modern gearboxes and motors are relatively noise efficient.

As outlined by Caneparo in their Transport Assessment, the intention would be to adopt a traffic light type indication for drivers to wait and enter, like a Car Wash. This would remove the need for audible sounds, such as beacons, to tell those waiting that the lift is ready to use.

If the EHO is of the view that overnight servicing cannot be supported until further details of the lift's specification and noise impact have been provided, can we please agree to a condition which enables the Applicant to provide such details post-permission?

Perhaps this could be wrapped up in the DSMP condition or other appropriate servicing condition, so that the Applicant is required to provide details of the quayside vehicle lift, its specification and a noise assessment of the likely noise impact (and mitigation if required) from overnight servicing on Sugar Quay, to be submitted and approved by the LPA, prior to overnight servicing commencing?

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 15th September returning on 29th September
From the 3rd November returning on 17th November



From: McBirney, Georgia
Sent: 01 August 2025 14:38
To: Grimley, Joanne [redacted] ; Smith, Alexander <[redacted]
Cc: McCallum, Kieran <[redacted]
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Thanks, Jo, I will share this with the applicant and will let you know if they come back with any comments.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 15th September returning on 29th September
From the 3rd November returning on 17th November



From: Grimley, Joanne <[redacted]
Sent: 01 August 2025 14:37
To: McBirney, Georgia <[redacted]>; Smith, Alexander [redacted]
Cc: McCallum, Kieran [redacted]
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Georgia,

Thank you –I am happy with the amendment.

Jo

Jo Grimley | **Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday mornings 09:00 –2:00pm.

From: McBirney, Georgia <[redacted]
Sent: 01 August 2025 14:36
To: Grimley, Joanne <[redacted]>; Smith, Alexander <[redacted]>
Cc: McCallum, Kieran <[redacted]>
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Jo,

Thank you for the below, I have made the amendment in red to be clear that this is only allowed in the activation areas. Can you let me know your thoughts:

No live or recorded sound shall be played that it can be heard within any residential unit or other premises. No events within the activation areas in the Quayside , involving live or recorded sound (including PA systems) shall take place outside of hours 10:00 and 21:00, Monday to Sunday . Live or recorded sound shall only be played in one activation area at any one time. There shall be no more than a total of 40 events across both activation areas in a 12 month period.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 15th September returning on 29th September
From the 3rd November returning on 17th November



From: Grimley, Joanne <[redacted]>
Sent: 01 August 2025 13:31
To: McBirney, Georgia [redacted]; Smith, Alexander <[redacted]>
Cc: McCallum, Kieran [redacted]
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Georgia,

Please see suggested condition below in relation to activation areas. I am around until 5pm today if you would like to discuss.

No live or recorded sound shall be played that it can be heard within any residential unit or other premises. No events, involving live or recorded sound (including PA systems) shall take place outside of hours 10:00 and 21:00, Monday to Sunday. Live or recorded sound shall only be played in one activation area at any one time. There shall be no more than a total of 40 events across both activation areas in a 12 month period.

Many Thanks
Jo

Jo Grimley | **Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday mornings 09:00 –2:00pm.

From: Grimley, Joanne
Sent: 01 August 2025 10:46
To: McBirney, Georgia [redacted]; Smith, Alexander <[redacted]>
Cc: McCallum, Kieran <[redacted]>

Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Georgia,

Thank you for sending through additional information. I will send a condition across later today regarding the activation areas.

With regards to the restriction on nighttime servicing, *the information contained within the Transport Response Note goes some way to alleviate concerns relating to overnight servicing, however we would require further information on the specification of the basement vehicle lift, particularly with regards to noise generated from the use of the lift.*

Many Thanks
Jo

Jo Grimley **| Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday mornings 09:00 –2:00pm.

From: McBirney, Georgia [redacted]
Sent: 01 August 2025 09:04
To: Grimley, Joanne [redacted]; Smith, Alexander [redacted]
Cc: McCallum, Kieran [redacted]
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Jo, Alex,

Thank you for your time yesterday afternoon. I put the questions about the activation areas and basement to the applicant team, and they provided the responses below. Happy to discuss as required.

It is envisaged that the two activation areas would be used together for events (i.e. you might have a performance in one and a food/drink stall in the other as part of the same event). The 30-40 events would be across both spaces.

With respect to the basement vehicle lift, the specific details of the lift are yet to be determined but it is envisaged that when the lift is not in use it will default to being sat at street level behind a low barrier, effectively closing the loading area off to the elements and acting as a 'lid' to the servicing area. This will keep the loading area closed off, reducing potential sound pollution.

When a vehicle looks to leave the servicing yard, the lift can then be called to basement level.

The exact type of lift is to be confirmed, but it is likely to be either a scissor style lift or a raising box lift.

The images below give you an idea of the types of lift being considered – you can see the 'lid' on both of them, but clearly specific details need to be worked out.





Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 15th September returning on 29th September
From the 3rd November returning on 17th November



From: Grimley, Joanne <[redacted]>
Sent: 31 July 2025 15:11
To: McBirney, Georgia <[redacted]>
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Georgia,

That's perfects. Alex Smith is going to come along too. I will pop a Teams meeting in.

Jo

Jo Grimley **| Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday mornings 09:00 –2:00pm.

From: McBirney, Georgia <[redacted]
Sent: 31 July 2025 15:10
To: Grimley, Joanne [redacted]
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Jo,

Sorry just been in a meeting, would you be free at 15:30?

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 15th September returning on 29th September
From the 3rd November returning on 17th November



From: Grimley, Joanne <[redacted]>
Sent: 31 July 2025 14:33
To: McBirney, Georgia <[redacted]>
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Georgia,

Have you got a 10/15 mins this afternoon to discuss Custom House?

Thanks

Jo

Jo Grimley **| Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: 020 7606 3030
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

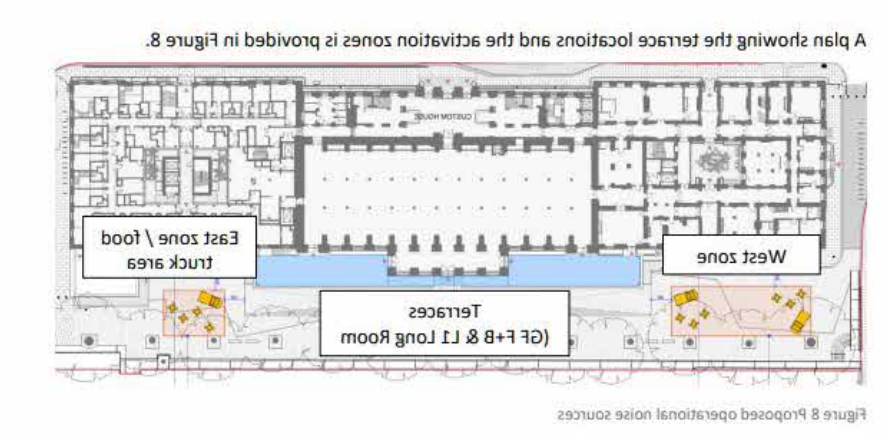
Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday mornings 09:00 –2:00pm.

From: McBirney, Georgia [redacted]>
Sent: 23 July 2025 10:12
To: Grimley, Joanne <[redacted]>
Cc: McCallum, Kieran [redacted]>; Grierson, John
[redacted]
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Jo,

Hope you are well.

As part of the proposals, two activations areas are proposed in the Quayside, as indicated on the plan below in red (extracted from the Noise Assessment). These proposed activation areas will include free to attend events (access to the quayside will not be restricted by barrier or ticketing), this could include small scale performances, music performances and food markets. The Noise report states on page 30 that no loud music performances will be included, that all activation will take between 10am and 9pm.



The Noise report includes an assessment for these activation spaces , could I have your view on this and whether this is acceptable as I will need to set this out in the committee report. We will need to attach a condition to reflect the proposals, below is an example of one that I agreed with Siobhan on 63 St Mary Axe recently, which we could adapt for this application:

No live or recorded sound shall be played that it can be heard outside the premises or within any residential unit or other premises including the rest of the building, with the exception of the area of public realm within the site immediately outside of the Multi-function space. Live or recorded sound shall not be in excess of 65dBA at the edge of the public realm within the site immediately outside of the Multi-function space, between the hours of 10:00- 22:00 Monday to Saturday and 11:00 to 21:00 on Sundays and is not permitted at any other time.

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 and DM21.3.

Happy to set up a meeting to discuss this if easier.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
The afternoon of the 23rd July
From the 15th September returning on 29th September



From: Grimley, Joanne <[redacted]
Sent: 16 July 2025 09:14
To: McBirney, Georgia <[redacted]
Cc: McCallum, Kieran [redacted]>; Grierson, John [redacted]>
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Good morning Georgia,

Apologies for my oversight. Considering the excavation, I would recommend the following condition is added:

Contaminated Land

Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. 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.

Kind Regards
Jo

Jo Grimley | **Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 08:15 –5:00pm and Friday

mornings 09:00 –2:00pm.

From: McBirney, Georgia <[redacted]
Sent: 15 July 2025 16:55
To: Grimley, Joanne [redacted]
Cc: McCallum, Kieran [redacted]; Grierson, John [redacted]
Subject: RE: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Hi Jo,

Hope you are well.

Further to the attached conditions that you provided in relation to application 25/00270/FULMAJ Custom House, would any conditions be required in relation to Land Contamination as the existing vehicle ramp is proposed to be replaced by a vehicle lift and this would result in some excavation.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From 16th July returning on 21st July
From the 15th September returning on 29th September



From: Grimley, Joanne <[redacted]
Sent: 16 April 2025 14:53
To: McBirney, Georgia [redacted]
Cc: PLN - Comments <[redacted]
Subject: FW: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

Good afternoon,

Please see comments attached from the Pollution Control Team in respect of this application.

Kind Regards

Jo

Jo Grimley | **Environmental Health Officer –Pollution Team**
Mobile: [redacted] | Switchboard: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

Katie Stewart
Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

Please note, my normal working hours are Wednesday and Thursday 09:00 –5:00pm and Friday mornings 09:00 –12:30pm.

From: Enterprise for Uniform [redacted]
Sent: 01 April 2025 11:57
To: DES - EH - Pollution <[redacted]>
Subject: 25/02479/NPLN - Planning Consultation - 20 Lower Thames Street Custom House

NEW SERVICE REQUEST RECEIVED

SERVICE REQUEST TYPE: Planning Consultation
REFERENCE: 25/02479/NPLN
DATE/TIME RECEIVED: 01/04/2025 11:49:00
ORGANISATION: 20 Lower Thames Street
ADDRESS: Custom House 20 Lower Thames Street London EC3R 6EA

COMPLAINANT

NAME:
ADDRESS:
EMAIL:
PHONE:
MOBILE:

DETAILS: Date 1 April 2025 Our Ref PT_GM/25/00270/FULMAJ Subject Custom House 20 Lower Thames Street & River Wall, Stairs And Crane Custom House Quay London EC3R 6EE An application has been received for: 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.

CoLAT

The City of London Archaeological Trust

Georgia McBirney
Environment Department
City of London Corporation
Guildhall

11 April 2025
By email only

Dear Ms McBirney,

Planning Application 25/00270/FULMAJ: Custom House, EC3

Many thanks for notifying the City of London Archaeological Trust (CoLAT) about this new application for development of Custom House.

We have a comment to make about the provision of archaeological mitigation. The proposed demolition plan of the basement shows widespread excavations for services throughout, and there is proposed to be a pool in the central section. These intrusions will remove previous strata, and while some of the layers to be removed will be from the periods of building of the 19th-century buildings (and even so not without interest), there may well be undisturbed archaeological deposits below dating from the period of the Roman quay and riverside wall, together with medieval foundations.

As of today there does not seem to be any archaeological assessment or evaluation of intended works within the building (the existing assessment is of the quay outside). We recommend as a matter of urgency that you ask for an archaeological assessment of the works in the basement, which should have accompanied the application.

With all best wishes

[redacted]

John Schofield
Secretary, CoLAT

City of London Archaeological Trust: Chamberlain's Department, City of London Corporation, Guildhall, London EC2P 2EJ. Website: www.colat.org.uk
Charity No. 268160 Chairman John White Secretary John Schofield, 2 Carthew Villas, London W6 0BS
Email: [redacted]

From: DCMdevelopment@thameswater.co.uk
To: PLNComments
Subject: 3rd Party Planning Application - 25/00270/FULMAJ
Date: 11 April 2025 10:33:33

THIS IS AN EXTERNAL EMAIL

Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 70754
Your Ref: 25/00270/FULMAJ

11 April 2025

Dear Sir/Madam

Re: Custom House, 20 Lower Thames Street & RIVER WALL, STAIRS & CRANE CUSTOM HOUSE, QUAY, London, EC3R 6EE

Waste Comments
Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimise the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd5d806d2ea6146417366068d78dbeb65%7C96e658cdb3ed4056851932225fb96be8%7C0%7C0%7C638799680124218164%7CUnknown%7CTWFpbGZsb3dfeyJFbXB0eUIsInGkiOnRyZWUiOiOiwLjAuMDAwMCIsIlAiOiJXaW4xMCIsIkFOIjoiTWFpbCIsIlBUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Epl01HUWKudg%2FHZqWjdoonJVZAuIK5QjggzxUKyD3uf4%3D&reserved=0

As required by Building regulations part H paragraph 2.36, Thames Water requires that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdata=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd5d806d2ea6146417366068d78dbeb65%7C96e658cdb3ed4056851932225fb96be8%7C0%7C0%7C638799680124239554%7CUnknown%7CTWFpbGZsb3dfeyJFbXB0eUIsInGkiOnRyZWUiOiOiwLjAuMDAwMCIsIlAiOiJXaW4xMCIsIkFOIjoiTWFpbCIsIlBUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=D8kHVlVIrpwoJmY77To1Gs45VITqYl0ykEDhS58Aaw4%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments
On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd5d806d2ea6146417366068d78dbeb65%7C96e658cdb3ed4056851932225fb96be8%7C0%7C0%7C638799680124240616%7CUnknown%7CTWFpbGZsb3dfeyJFbXB0eUIsInGkiOnRyZWUiOiOiwLjAuMDAwMCIsIlAiOiJXaW4xMCIsIkFOIjoiTWFpbCIsIlBUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=QPyDMqwOueTj1YxZma649Vo4JCRXFTcQRUkRFd56A8%3D&reserved=0

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd5d806d2ea6146417366068d78dbeb65%7C96e658cdb3ed4056851932225fb96be8%7C0%7C0%7C638799680124261082%7CUnknown%7CTWFpbGZsb3dfeyJFbXB0eUIsInGkiOnRyZWUiOiOiwLjAuMDAwMCIsIlAiOiJXaW4xMCIsIkFOIjoiTWFpbCIsIlBUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=5GfDgVraPqFBnBvmMEAnlZnR2wsrDcSBimeYpgMIM%3D&reserved=0 Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:0203 577 9998
Email: devcon.team@thameswater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to devcon.team@thameswater.co.uk
Visit us online https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd5d806d2ea6146417366068d78dbeb65%7C96e658cdb3ed4056851932225fb96be8%7C0%7C0%7C638799680124273264%7CUnknown%7CTWFpbGZsb3dfeyJFbXB0eUIsInGkiOnRyZWUiOiOiwLjAuMDAwMCIsIlAiOiJXaW4xMCIsIkFOIjoiTWFpbCIsIlBUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=8Vq2ZBMLGBn3UWuBEoyWIZ9R9Wy9kcWiUIJda4e7u5Y%3D&reserved=0 , follow us on twitter https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd5d806d2ea6146417366068d78dbeb65%7C96e658cdb3ed4056851932225fb96be8%7C0%7C0%7C638799680124285925%7CUnknown%7CTWFpbGZsb3dfeyJFbXB0eUIsInGkiOnRyZWUiOiOiwLjAuMDAwMCIsIlAiOiJXaW4xMCIsIkFOIjoiTWFpbCIsIlBUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=AoUx7mtKSvL2IuO3ajNv4T5dyiy27AgzuKcfYUV9Ok8%3D&reserved=0 or find us on https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswaterdotcom&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd5d806d2ea6146417366068d78dbeb65%7C96e658cdb3ed4056851932225fb96be8%7C0%7C0%7C638799680124306091%7CUnknown%7CTWFpbGZsb3dfeyJFbXB0eUIsInGkiOnRyZWUiOiOiwLjAuMDAwMCIsIlAiOiJXaW4xMCIsIkFOIjoiTWFpbCIsIlBUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=QuqSjHN9kdKLwUAmPIMNtzfTbPERyHDd6cuBrWnHQ%3D&reserved=0. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

Date: 15 April 2025
Our ref: 509029
Your ref: 25/00270/FULMAJ

City of London
PLNComments@cityoflondon.gov.uk

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

Planning consultation: 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 there development 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.
Location: Custom House 20 Lower Thames Street & River Wall, Stairs And Crane CustomHouse Quay London EC3R 6EE

Thank you for your consultation on the above dated 01 April 2025 which was received by Natural England on 01 April 2025

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

National Trail
Consideration should be given to the potential impacts on the adjacent/nearby Thames Path National Trail. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Sites of Special Scientific Interest Impact Risk Zones
The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Gabriel Brooks
Consultations Team

Annex A – Natural England general advice

Protected Landscapes
Paragraph 189 of the National Planning Policy Framework - GOV.UK (www.gov.uk) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling-up and Regeneration Act 2023 (legislation.gov.uk) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes
Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) - Landscape Institute for further guidance.

Biodiversity duty
Section 40 of the Natural Environment and Rural Communities Act 2006 (legislation.gov.uk) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the Complying with the biodiversity duty - GOV.UK (www.gov.uk) for further information.

Designated nature conservation sites
Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see Habitats regulations assessments: protecting a European site - GOV.UK (www.gov.uk) and Natural England must be consulted on 'appropriate assessments' (see Appropriate assessment - GOV.UK (www.gov.uk) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the SSSI Impact Risk Zones (England) (arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified (Sites of special scientific interest: public body responsibilities - GOV.UK (www.gov.uk).

Protected Species
Natural England has produced Protected species and development: advice for local planning authorities (gov.uk) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Annex A – Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to Wildlife licences: when you need to apply (www.gov.uk) for more information.

Local sites and priority habitats and species
The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local nature recovery strategies - GOV.UK (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to Habitats and species of principal importance in England (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the Brownfield Hub - Buglife for more information and Natural England's Open Mosaic Habitat (Draft) - data.gov.uk (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains
Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the National Planning Policy Framework (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

Biodiversity Net Gain guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the Biodiversity Net Gain Planning Practice Guidance (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate biodiversity value with the statutory biodiversity metric for more information. For small development sites, The Small Sites Metric may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: managing your land

Annex A – Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (naturalengland.org.uk) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

Natural environment - GOV.UK (www.gov.uk) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees
The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The Natural England Access to Evidence - Ancient woodlands Map can help to identify ancient woodland. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils
Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk). Find open data - data.gov.uk on Agricultural Land Classification or use the information available on MAGIC (defra.gov.uk).

The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (publishing.service.gov.uk) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to Reclaim minerals extraction and landfill sites to agriculture - GOV.UK (www.gov.uk), which provides guidance on soil protection for site restoration and aftercare. The Soils Guidance (quarrying.org) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure
For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to Green Infrastructure Home (naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Annex A – Natural England general advice

The Green Infrastructure Map (naturalengland.org.uk) and GI Mapping Analysis (naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:
Paragraphs 105, 185, 187 and 193 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to Find your perfect trail, and discover the land of myths and legend - National Trails for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the Natural environment - GOV.UK (www.gov.uk).

Georgia McBirney
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Development Management
Planning and Building Control
Housing and Regeneration Directorate
Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ
www.towerhamlets.gov.uk

Application Number: PA/25/00627
Your ref: 25/00270/FULMAJ

Enquiries to: Ronan Murray
Tel:
Email: [redacted]

16 April, 2025

Dear Georgia McBirney,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	Custom House 20 Lower Thames Street & River Wall, Stairs And Crane Custom, House Quay London EC3R 6EE
Proposal	Observations requested by City of London for 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

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above applciation. I would be grateful if you would take the observations set out about into consideration:-

1. The Local Planning Authority does not wish to make comments in response to this application.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control

Historic England

Ms Georgia McBirney
Planning Administration
Environment Department
City of London Corporation

Your Ref: 25/00270/FULMAJ
Our Ref: 231726

Contact: Helen Hawkins
[redacted]

22 April 2025

Dear Ms McBirney,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2024

Custom House 20 Lower Thames Street & 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

Recommend Archaeology Conditions

Thank you for your consultation received on 01 April 2025.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

An archaeological desk-based assessment (Mills Whipp 2025) and archaeological evaluation report (MOLA 2025) accompanied the planning application. The desk-based assessment highlighted that the majority of the site is located on land reclaimed from the river. The original Roman masonry riverfront wall is likely to have been located running east-west through the north of the site. This wall has recently been Scheduled where it was found directly adjacent to the site at Sugar Quay and if remains of the wall survive on the site they would be regarded as being of national significance. Other archaeological remains likely to be present on the site comprise medieval and post-medieval timber waterfronts. The desk-based assessment also highlights that geotechnical,works have shownthe eastern part current Custom House building was extensively underpinned in the earlier 19th century and it is anticipated that the raft extends under the central and western parts of the site, although no investigations have taken place in these areas. Archaeological watching briefs within the building have identified an extensive concrete raft of 19th century date is present beneath the structure which is likely to have removed all archaeology within the building's footprint.

The archaeological evaluation was focused to the south of the building, within areas of proposed impact from the new development. The evaluation identified two earlier river walls of 19th century date and a cobbled surface. Archaeology pre-dating the 19th century was not identified although the trenches were not excavated down to natural ground due to site restrictions

Within the current Custom House, proposed impacts comprise a new swimming pool and investigations around current foundations which may require some demolition and strengthening. The basement floor slab and some of the concrete raft may also need to be

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

removed. The depth of the new swimming pool is currently unknown. However, the underpinning of the 19th century is believed to be so extensive that the new development is likely to have little archaeological impact. The swimming pool is located away from the likely location of the masonry Roman river wall.

Outside the current building, the main potential impacts on archaeology relate to a new ramp and basement extension along the southern frontage of the building. Excavations of up to 4.5m in depth will be required here and a secant piled wall is also proposed. The archaeological evaluation has established that although archaeological remains of 19th century date are present in this area, they are of local significance. If medieval or post-medieval waterfronts survive in this area below the 19th century material, the harm to them can also be mitigated through archaeological excavation and recording.

It is therefore recommended that an archaeological watching brief is carried out on below ground excavations within the Custom House and that the archaeological remains to the south of the building are mitigated by archaeological excavation and recording in advance of development. There is a low potential for the Roman riverfront wall to survive on the site, given previous likely levels of truncation and the location of proposed impacts within the building butfoundation designs should allow for the preservation of the wall, should it be encountered during the watching brief.

A Cultural Strategy has also been provided with the planning application. The Cultural Strategy includes a number of proposals which relate to the history of the Custom House and its environs and proposes much greater public access to the building and waterfront. The proposals in the Cultural Strategy are welcomed and can potentially be enhanced by the results of the archaeological excavation.

The archaeological evaluation revealed a number of features which contained material which could be salvaged and reused on the site. Materials include a former cobbled surface and the masonry remains of two earlier waterfront walls which were constructed from high quality materials. The remains of the river walls are likely to be extensive and we would therefore recommend salvage of the materials and reuse on the site where appropriate.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

I therefore recommend attaching two conditions as follows:

Condition 1 No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. If remains of the nationally significant Roman river wall are encountered during the development, a mitigation strategy to avoid or minimise harm will be required.
C. Details of a programme for delivering related positive public benefits. This should be formulated in association with the proposals in the Cultural Strategy
D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Condition 2 Salvage and Reuse

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

No development shall take place until a scheme for identifying materials for salvage and their retention and reuse within the development have been submitted to and approved by the local planning authority. The development shall be carried out in accordance with the approved scheme.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 218.

I envisage that the archaeological fieldwork would comprise the following:

Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

The archaeological watching brief will be focussed on demolition and construction works within the current building. If the extensive raft identified in the east of the site continues across the centre and west of the building, the need for continuation of the watching brief can be reviewed.

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

The excavation will be carried out to the south of the Custom House building where the new ramp and enabling works are to take place.

Public Benefit

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

The archaeological contractor should work in partnership with the Cultural Strategy to provide a public engagement programme that reflects and support the proposals of the Cultural Strategy

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

creating a better place
for people and wildlife

Environment Agency

Georgia McBirney
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/138035/01
Your ref: 25/00270/FULMAJ

Date: 24 April 2025

Dear Georgia,

Custom House 20 Lower Thames Street & 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.

Thank you for consulting us on the above planning application on 1 April 2025 as part of our response to this consultation, we have reviewed the submitted information, drawings and plans, including:

- Custom House, Lower Thames Street, Flood Risk Assessment (parts 1, 2 and 3), prepared by ElliottWood, reference: 2230380- EWP- ZZ- XX- RP- C- 0001, dated February 2025.
- River Wall Penetrations Technical Note, prepared by ElliottWood, revision P02, dated January 2025.

Environment Agency Position
Based on a review of the submitted information, **we have no objection to the proposal, subject to the inclusion of two planning conditions on the decision notice of any grant of planning permission**. Without these conditions, the

proposed development would not be safe from flooding for its lifetime, and we would therefore object in line with National Planning Policy Framework (NPPF) paragraph 181, as well as Policy CS18 (Flood Risk) of the adopted City Plan. The conditions are as follows:

1. Detailed Design of Flood Defences
2. Scheme to be agreed - Flood Gate Operational Contingency Plan

Condition 1 – Detailed Design of Flood Defences
The development hereby permitted must not be commenced until detailed designs of the fully replaced flood defence, including the new vehicle access flood gate, have been submitted to, and approved in writing by, the Local Planning Authority (LPA), in consultation with the Environment Agency.

A submitted detailed design of the replacement flood defence and vehicle access flood gate must include, but not be limited to, the following details:

- That the flood defence shall be designed with a lifetime no less than 100 years from the date the last dwelling is expected to be completed;
- That the flood defence shall be designed with a crest level no lower than the Thames Estuary 2100 Plan 2090 level. At present, the flood defence crest height should be set at a minimum of 6.35 mAOD.
- Details of how the replacement flood defence structure will tie into the flood defences and ground levels on the neighbouring sites both upstream and downstream;
- Demonstrate that the flood defence will be structurally independent and not rely on secondary structures, such as the existing river wall, the proposed development or any proposed additional buried elements;
- The flood defence design shall be supported by full structural and stability calculations including design checks, and any needed ground investigation works;
- Details of any proposed landscaping, footpaths, lighting, street furniture, planting and any underground services, utilities and drainage features within the area between the flood defence and the proposed buildings. It needs to be demonstrated that these features will not adversely impact the structural integrity of the flood defence, or restrict access to the defence for maintenance, inspections and emergency works. Street furniture within 10 metres of the flood defence wall with features that could restrict access must be demountable;
- Tracking diagram demonstrating vehicle tracking along the entire frontage of the flood defence;
- Details of the replacement vehicle access flood gate, demonstrating that the proposed replacement gate will be:
    - No wider than the existing flood gate.
    - Set no lower than the existing gate threshold height

The approved detailed design of the fully replaced flood defence should then be implemented in full and maintained for the lifetime of the development.

Reason
To protect the structural integrity of the flood defence. To ensure the development is safe from flood risk for its lifetime and to ensure that there is no increase in flood risk elsewhere or on site as a result of the development in line with NPPF paragraph 181, as well as Policy CS18 (Flood Risk) of the adopted City Plan

Condition 2 – Scheme to be agreed – Flood Gate Operational Contingency Plan
Prior to any works to the flood defences/flood gate, a Flood Gate Operational Contingency Plan shall be submitted to, an approved in writing by, the LPA, in consultation with the Environment Agency.

The Flood Gate Operational Contingency Plan must include:

- Details of how the flood gate will be operated under various modes of operation, including degraded modes of operation.
- Who will be responsible for operating the flood gate, at all times, and what the operational arrangements will be from receiving a Central London Flood Alert and closing the flood gate.

Reason
To ensure a continuous defence line is maintained and that the development is safe from flood risk for its lifetime and to ensure there is not increase in flood risk elsewhere or on site as a result of this development in line with NPPF paragraph 181, as well as Policy CS18 (Flood Risk) of the adopted City Plan.

Informative

Due to the site's proximity to the river Thames and its flood defences, a flood risk activity permit will be required for the development. Please include the below informative on decision notice of any grant of planning permission.

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

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

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702

422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to Local Planning Authority

Loss of Flood Plain Storage
Section 9 of the FRA details the Flood Compensation for the proposal. We are happy to accept flood volume loss of 118.9m3, which is more than the 70m3 agreed at pre-application, due to the improvements made with regard to the flood defences.

Tidal Breach and Flood Risk
The site is located within Flood Zone 3 and is protected to a very high standard by the Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year flood event. Our latest flood modelling shows the site would be at risk if there was to be a breach in the defences or they were to be overtopped.

We are satisfied that:

- The developer has assessed the risk from a breach in the Thames tidal flood defences using the latest modelled tidal breach data.
- The developer has not proposed any sleeping accommodation below the modelled tidal breach flood level.

Flood risk issues not within our direct remit
The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Flood warning and emergency response
We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. Planning Practice Guidance (PPG) states that, in

determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 of the National Planning Policy Framework and the guiding principles of the PPG.

Advice to Applicant

Flood resistance and resilience
We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx

British Standard 85500 – Flood resistant and resilient construction
https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in

those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

Signing up for flood warnings
The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit https://www.gov.uk/sign-up-for-flood-warnings. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit https://www.gov.uk/prepare-for-flooding

To get help during a flood, visit https://www.gov.uk/help-during-flood

For advice on what do after a flood, visit https://www.gov.uk/after-flood

Pre-Application Advice
Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy

of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please do not hesitate to contact me on HNLSustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk
Telephone: 02030251774

THE GEORGIAN GROUP

28/04/25

LPA References: 25/00270/FULMAJ & 25/00271/LBC

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

Dear Ms McBirney,

Thank you for consulting the Georgian Group on the above applications for Planning Permission and Listed Building Consent. Based on the information available to date, the Group forwards the following advice to assist your local authority in determining these applications.

Summary

The Georgian Group has been involved in pre-application discussions with the applicant, and it is clear from the submitted documentation that our advice has been carefully considered. The scheme has the potential to deliver both public and heritage benefits, including enabling public access to this exceptional building.

While the proposed conversion from office to hotel use would result in less than substantial harm to the building's significance, such alterations should be assessed in the context of the change of use and weighed against the associated public and heritage benefits.

The Group understands that further information will emerge once opening up works begin, which may necessitate a variation in approach. It is therefore important to agree on a clear set of guiding principles to inform the works. The principles outlined in the documentation should form the basis for a set of conditions to be agreed upon prior to determination.

These conditions should specifically address internal doors, fanlights, windows, and matters relating to the servicing strategy, as well as the potential impact on the building's structure. Such conditions will be integral to ensuring minimal variation in the approved works. Additionally, assurances should be sought regarding the viability of the scheme, as outlined in the following text.

The Georgian Group does not object to the applications on heritage grounds. Your local authority should ensure that the necessary agreements are in place to provide the proposed level of public access.

Significance of Heritage Assets

A Custom House has stood near the application site since the 14th century. In 1382, John Churchman cleared and redeveloped a site to the east of the current building - an area then known as Wool Quay, later renamed Custom House Quay. This early structure was either enlarged or rebuilt in 1559 but was ultimately destroyed in the Great Fire of London. Its replacement, designed by Christopher Wren and constructed between 1669 and 1671,

6 Fitzroy Square, London W1T 5DX
020 7529 8920
office@georgiangroup.org.uk
www.georgiangroup.org.uk
Registered Charity No. 209934

Patron HM King Charles III
Vice-Patron The Rt. Rev. and Rt Hon. Lord Chartes
Chairman Paul Zisman
Director David Adshead

introduced a plan form that would go on to influence the design of later Custom Houses.

Following a fire in 1715, Thomas Ripley was commissioned to rebuild the Custom House. He followed a design similar to Wren's but added an additional storey. Ripley's building ultimately met the same fate as its predecessors and was destroyed by fire in 1814. Even before this, the increasing volume of trade entering London had led to the decision that a new, larger building was needed.

David Laing, in his role as Surveyor to the Customs, designed the replacement on a new site located to the west of the former building. However, he soon came under scrutiny when subsidence caused parts of the central block to collapse in 1824-25. In response, Robert Smirke was appointed to rectify the structural issues. Renowned for his expertise in such matters, Smirke introduced a number of innovative techniques for the time, including the use of concrete for the foundations and iron plates for fireproofing. Smirke also redesigned Laing's Long Room and the southern quayside elevation, adding an applied portico. Internally, he made only minor alterations to the western block, largely preserving Laing's original layout.

Today, the building comprises three distinct sections: the west wing, which reflects Laing's original scheme; Smirke's reconstructed central block; and the eastern wing, rebuilt between 1962 and 1966 after suffering damage during the Blitz. Custom House is of exceptional architectural, artistic, and historic significance and possesses considerable archaeological and evidential value.

The surviving plan of Laing's block represents an important early example of purpose-built office development in the City of London. His use of borrowed light in the western block - achieved through the internal courtyard and decorative internal fanlights - is of note and reflects the influence of John Soane, to whom Laing was articled in 1790. Smirke's structural innovations further enhance the significance of the building.

The grade II* listed river wall, stairs and cranes are situated to the south of the application site. They possess high levels of architectural, historic and technological interest which is set out clearly within the listing entry for the asset. Of particular note is the group value with the Custom House.

This section is not an exhaustive account of all elements contributing to the building's significance. Throughout the pre-application discussions, we have highlighted key areas of interest, including internal elements.

Proposals

The application for planning permission relates to the change of use of the existing building from office to a hotel-led mixed-use development. The proposed scheme will comprise a hotel, a basement-level spa and health facility, and a ground floor café, gallery, and events space. The application also includes the implementation of a public realm scheme along the existing quayside, with access to the building provided via a newly proposed stair and ramp addition, which will also create two terraces on the southern side of the building.

A separate listed building consent application has been submitted for internal and external alterations associated with the proposed change of use. A full description of the proposed works can be found on the City of London Planning Portal.

Proposals and Their Impact

Quayside, Ramps & Terrace

The proposals include the introduction of two ramps extending east and west from the central entrance point leading into the King's Warehouse. Steps descending from the entrance will be integrated into the ramp design, with newly formed terraces situated on either side of the entrance. This intervention will require the removal of the existing steps up to the King's Warehouse, which date from Smirke's alterations to the building. While their removal would result in a degree of harm to the building's significance, it should be considered in the context of establishing a new use for the building.

The Group has been engaged in pre-application discussions with the applicant and is satisfied that the proposed ramps and steps are subservient in scale and architectural character to the host building.

Additional entry points into the King's Warehouse and west wing will be created from the two terraces, necessitating the removal of historic fabric. The Group is satisfied that the detailing of these interventions will mitigate the impact on the heritage asset.

Enhancement works will also be carried out to the southern quayside elevation of the building, including the removal of the east wing ramp and its replacement with a vehicle lift. This alteration is considered a heritage benefit, as it restores the east wing elevation closer to its historic appearance. According to the application documentation, the quayside will be accessible to the public seven days a week, 24 hours a day. This should be recognised as an important public benefit arising from the proposals.

West Wing

The surviving planform within the west wing is a significant contributing factor to the exceptional interest associated with the building. Key spaces within the west wing include the Robing Room, the Tidewaiters' Room, and the suite of rooms in the southeast corner associated with the historic Landing Surveyors' Department. Retaining the proportions of these rooms and their architectural detailing is of the utmost importance.

The applicant has adopted an innovative approach to accommodating and concealing the necessary servicing required for the introduction of hotel suites within the west wing. The Group is satisfied that the proportions and spatial qualities of the rooms will remain appreciable following the introduction of the service risers. The risers will align with the existing room datum and be set back from the existing historic fabric to minimise their visual impact.

The proposals also include the reinstatement of the historic proportions of the west wing lightwell, which represents a notable heritage benefit. Furthermore, public access will be introduced to several key rooms within the west wing, which should also be considered a heritage benefit arising from the scheme.

Central Block/ Long Room / King's Warehouse

The principal alteration to the central block of the building involves the creation of a terrace within the applied portico. The Group participated in pre-application discussions with the applicant regarding this intervention, during which it was agreed that lowering five window cills on the southern elevation of the Long Room would allow the external primacy of the portico to be preserved. In contrast, lowering only three cills would have disrupted the rhythm and symmetry of the southern elevation. The creation of the terrace should be understood in the

context of the building's proposed new use. The Group is satisfied that the harm caused by lowering five cills can be mitigated through appropriate detailing and notes that the architects have undertaken similar interventions successfully elsewhere.

In the northern section of the central block, it is proposed to introduce additional lift and stair access, which will require the removal of historic fabric and the penetration of brick vaulting. This intervention would result in harm to the building's significance. Your local authority should be assured that the structural implications of removing the vaults are fully understood before work commences.

The reinstatement of the Long Room lobby to its historic proportions would represent a heritage benefit, reintroducing the original circulation route from the ground floor to the Long Room. This experience would be further enhanced by the reopening of the third entrance door into the Long Room and the reinstatement of a lightwell to the east wing, allowing natural light to enter through the high-level window into the Long Room.

Servicing

The servicing strategy has been developed to minimise the presence of heavy and intrusive plant equipment within the west wing and central block. This approach is to be encouraged, although it has necessitated a slight raising of the east wing roof. While the applicant has designed a pitched enclosure to help mitigate the visual impact, it does not eliminate the impact entirely, and the resulting alteration to the east wing roofline would cause a degree of harm to the building's significance. This harm should be considered in the context of the overall servicing strategy, which has prioritised the avoidance of placing large-scale plant within the west and central blocks.

It is also proposed to remove sections of the west wing roof to accommodate servicing, which would similarly cause harm to the building's significance. This impact should be weighed against the wider benefits of the scheme. The introduction of service risers within rooms in the west wing has been addressed in the preceding sections.

Windows & Doors

As a result of the proposed change of use, upgrading works to internal doors and fanlights will be required to meet fire safety standards. An overarching strategy for addressing these requirements has been outlined within the application documents, which state that the final design and specification will be developed at the next stage.

It is recommended that the final details be secured by condition, with the Group consulted on their development. This recommendation also applies to the proposed locations of mono-laminate and slimline double-glazed units, which should likewise be subject to an appropriate planning condition. The Richard Griffiths Condition Survey and Gazetteer will be a valuable resource in guiding the appropriate locations for these alterations.

Public and Heritage Benefits

The proposed scheme has the potential to deliver a number of public and heritage benefits, several of which have been referenced in the text above. These benefits have also been clearly outlined within the application documentation, which the Group acknowledges.

The level of proposed public access is particularly welcome and, if delivered as described, will provide many members of the public with their first opportunity to view the interior of the building. This represents a significant public benefit. Your local authority should ensure that the

necessary agreements are in place, which will ensure that public access, to the extent proposed is provided.

Viability

Montagu Evans has produced a viability assessment, and Savills has provided a market commentary. However, these documents assess only the demand and viability of the existing office use, rather than that of the proposed hotel use. They have been submitted to justify a departure from City Plan policy, which seeks to protect existing office floorspace.

Notably, there is no assessment of the viability of the proposed hotel-led scheme itself. Your local authority should be satisfied that, in the event consent is granted, the scheme can be delivered as proposed - without the need for further intrusive works at a later stage to ensure its viability.

River Wall, Stairs and Cranes

The introduction of new terraces, ramps, and steps leading up to the King's Warehouse would impact the group value between the River Wall, Stairs and Cranes, and the Custom House. However, certain elements of the scheme would serve to enhance the significance of the River Wall, Stairs, and Cranes.

These positive works include the removal of the existing railings and steel balustrade that currently run the length of the wall, as well as the repositioning of one of the historic cranes to its presumed original location in front of the building. This intervention would strengthen the historic relationship between the quay and the building.

Legislation, Policy and Guidance

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it a statutory duty for the decision maker when considering whether to grant listed building consent to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 66(1) of the Act relates to applications for planning permission where it affects a listed building or its setting. It makes it statutory duty for decision makers to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which it possesses.

The National Planning Policy Framework (NPPF) sets out guidance on how the statutory duty within the Planning (Listed Buildings and Conservation Areas) Act 1990 is to be carried out. Paragraph 212 states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 213 states that 'any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

Planning practice guidance set out by the government requires any harm identified to be either classified as less than substantial or substantial harm. If the harm is identified as less than substantial, then in line with paragraph 215 of the NPPF this harm should be weighed against the public benefits associated with the proposed scheme.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'where in making any determination under the planning Acts, regard is to be had to the development plan, the

determination shall be made in accordance with the plan unless material consideration indicates otherwise'.

London Plan Policy HC1 states 'development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.'

The City of London's Local Plan Core Strategic Policy CS12 sets out the City's objective to 'conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors'.

Policy DM 12.1 Managing change affecting all heritage assets and spaces sets out the City of London's intention to 'sustain and enhance heritage assets, their settings and significance'.

Policy DM 12.3 Listed Buildings states that the City of London will only 'grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting'.

Recommendation

The Georgian Group has no objection to the applications on heritage grounds.

Before determining these applications, your local authority should agree on draft conditions to address the areas highlighted in this letter. This includes works to internal doors and fanlights, as well as issues relating to the provision of services and the potential impact on the structure of the building.

The success of the scheme will depend on the delivery of the proposed public and heritage benefits. Your local authority should ensure that the necessary agreements are in place, which will ensure that public access, to the extent proposed is provided.

Your authority should take these representations into account in determining the applications.

Yours sincerely,

Eddie Waller IHBC

Senior Conservation Adviser

London and South East England

creating a better place
for people and wildlife

Environment Agency

Georgia McBirney
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/138035/02
Your ref: 25/00270/FULMAJ

Date: 2 May 2025

Dear Georgia,

Custom House 20 Lower Thames Street & 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.

Thank you for reconsulting us on the above planning application on 25 July 2025. As part of our response to this consultation, we have reviewed the revised drawings and **have no updated comments** on the proposal. Please see a reiteration of our last response (reference: NE/2025/138035/02) below:

Environment Agency Position
Based on a review of the submitted information, **we have no objection to the proposal, subject to the inclusion of two planning conditions on the decision notice of any grant of planning permission**. Without these conditions, the proposed development would not be safe from flooding for its lifetime, and we would therefore object in line with National Planning Policy Framework (NPPF) paragraph 181, as well as Policy CS18 (Flood Risk) of the adopted City Plan. The conditions are as follows:

1. Detailed Design of Flood Defences
2. Scheme to be agreed - Flood Gate Operational Contingency Plan

Condition 1 – Detailed Design of Flood Defences
The development hereby permitted must not be commenced until detailed designs of the fully replaced flood defence, including the new vehicle access flood gate, have been submitted to, and approved in writing by, the Local Planning Authority (LPA), in consultation with the Environment Agency.

A submitted detailed design of the replacement flood defence and vehicle access flood gate must include, but not be limited to, the following details:

- That the flood defence shall be designed with a lifetime no less than 100 years from the date the building is first occupied.
- That the flood defence shall be designed with a crest level no lower than the Thames Estuary 2100 Plan 2090 level. At present, the flood defence crest height should be set at a minimum of 6.35 mAOD.
- Details of how the replacement flood defence structure will tie into the flood defences and ground levels on the neighbouring sites both upstream and downstream;
- Demonstrate that the flood defence will be structurally independent and not rely on secondary structures, such as the existing river wall, the proposed development or any proposed additional buried elements;
- The flood defence design shall be supported by full structural and stability calculations including design checks, and any needed ground investigation works;
- Details of any proposed landscaping, footpaths, lighting, street furniture, planting and any underground services, utilities and drainage features within the area between the flood defence and the proposed buildings. It needs to be demonstrated that these features will not adversely impact the structural integrity of the flood defence, or restrict access to the defence for maintenance, inspections and emergency works. Street furniture within 10 metres of the flood defence wall with features that could restrict access must be demountable;
- Tracking diagram demonstrating vehicle tracking along the entire frontage of the flood defence;
- Details of the replacement vehicle access flood gate, demonstrating that the proposed replacement gate will be:
    - No wider than the existing flood gate.
    - Set no lower than the existing gate threshold height

The approved detailed design of the fully replaced flood defence should then be implemented in full and maintained for the lifetime of the development.

Reason
To protect the structural integrity of the flood defence. To ensure the development is safe from flood risk for its lifetime and to ensure that there is no increase in flood risk elsewhere or on site as a result of the development in line with NPPF paragraph 181, as well as Policy CS18 (Flood Risk) of the adopted City Plan

Condition 2 – Scheme to be agreed – Flood Gate Operational Contingency Plan
Prior to any works to the flood defences/flood gate, a Flood Gate Operational Contingency Plan shall be submitted to, an approved in writing by, the LPA, in consultation with the Environment Agency.

The Flood Gate Operational Contingency Plan must include:

- Details of how the flood gate will be operated under various modes of operation, including degraded modes of operation.
- Who will be responsible for operating the flood gate, at all times, and what the operational arrangements will be from receiving a Central London Flood Alert and closing the flood gate.

Reason
To ensure a continuous defence line is maintained and that the development is safe from flood risk for its lifetime and to ensure there is not increase in flood risk elsewhere or on site as a result of this development in line with NPPF paragraph 181, as well as Policy CS18 (Flood Risk) of the adopted City Plan.

Informative

Due to the site's proximity to the river Thames and its flood defences, a flood risk activity permit will be required for the development. Please include the below informative on decision notice of any grant of planning permission.

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

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

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

opportunity.

Advice to Local Planning Authority

Loss of Flood Plain Storage
Section 9 of the FRA details the Flood Compensation for the proposal. We are happy to accept flood volume loss of 118.9m3, which is more than the 70m3 agreed at pre-application, due to the improvements made with regard to the flood defences.

Tidal Breach and Flood Risk
The site is located within Flood Zone 3 and is protected to a very high standard by the Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year flood event. Our latest flood modelling shows the site would be at risk if there was to be a breach in the defences or they were to be overtopped.

We are satisfied that:

- The developer has assessed the risk from a breach in the Thames tidal flood defences using the latest modelled tidal breach data.
- The developer has not proposed any sleeping accommodation below the modelled tidal breach flood level.

Flood risk issues not within our direct remit
The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Flood warning and emergency response
We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. Planning Practice Guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that

any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 of the National Planning Policy Framework and the guiding principles of the PPG.

Advice to Applicant

Flood resistance and resilience
We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx

British Standard 85500 – Flood resistant and resilient construction
https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings

should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

Signing up for flood warnings
The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit https://www.gov.uk/sign-up-for-flood-warnings. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit https://www.gov.uk/prepare-for-flooding

To get help during a flood, visit https://www.gov.uk/help-during-flood

For advice on what do after a flood, visit https://www.gov.uk/after-flood

Pre-Application Advice
Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

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

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

contact me on HNLSustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Harry Scott
Planning Specialist

E-mail: HNLSustainablePlaces@environment-agency.gov.uk
Telephone: 02030251774

From: [redacted]
To:
Cc:
Subject: Application Ref: 25/00270/FULMAJ & 25/00271/LBC - Custom House, 20, Lower Thames Street & River Wall, Stairs And Crane, Custom, House Quay, London, EC3R 6EE
Date: 06 May 2025 14:33:33

Some people who received this message don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

FAO: Georgia McBirney

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

Application Ref: 25/00270/FULMAJ & 25/00271/LBC

Proposal: 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.

Statutory Remit: Historic Buildings & Places (formerly the AMS) is a consultee for Listed Building Consent applications, as per the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.

Comments: Thank you for notifying HB&P of the above application for listed building consent. HB&P strongly objected to the previous scheme for a hotel conversion due to the significant level of harm that would have arisen as a result of the alterations proposed.

The much revised scheme that is subject to the current application was discussed at our most recent Casework Committee meeting and the Trustees are content that the most harmful elements are no longer included and the level of change now proposed is acceptable, given the associated public and heritage benefits that will be achieved. This is particularly relevant for Laing's historic west wing and Smirk's rebuilt Long Room and the King's Warehouse in the central section.

The details and materials, etc. will need to be carefully conditioned and HB&P are therefore content to defer to the advice of Council's conservation team for all other conservation issues.

Policy: Chapter 16 of the NPPF (2024), particularly paragraph 212, states: 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Regards

Ross Anthony
Case Work
www.hbap.org.uk
+44 (0)20 7236 3934
The Courtyard
37 Spital Square
London E1 6DY

Historic Buildings & Places is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). It is one of the National Amenity Societies and a consultee on Listed Building Consent applications as per the ***Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021***. We are concerned with historic assets of all types and all ages, including planning applications affecting historic buildings in conservation areas and undesignated heritage.

SAVE Britain's Heritage
New Life for Remarkable Buildings

Ms Georgia McBirney
Environment Department
City of London Corporation
PO Box 270,
Guildhall,
London EC2P 2EJ

By email to: [redacted]
PLNComments@cityoflondon.gov.uk

Our reference: 25024

09.05.25

Dear Ms McBirney,

Planning and Listed Building Applications 25/00270/FULMAJ & 25/00271/LBC | Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE

SAVE Britain's Heritage writes to support the above planning and listed building consent applications and wishes to offer further comments in relation to the proposed public access for this exceptionally important public building.

SAVE is grateful for the opportunity to have been consulted on several occasions as this scheme developed. We are pleased that the current proposals are much improved from the plans refused at public inquiry in 2022. Public access to the interior (including the ground floor and Long Room) and to the Quayside Terrace have been a paramount concern for SAVE since 2020 when the previous plans were submitted. In this regard, the public access proposed by the current scheme is a step forward, but we consider that these commitments need to be enforceable through a S.106 agreement.

Proposals
The above planning application proposes a change of use of the existing building from office to hotel-led mixed use, and the implementation of a new public realm scheme to the existing quayside. Public spaces within the building are proposed to include a north/south route, gallery, cafe and events space. The associated listed building consent application proposes the alteration, extension and refurbishment to the exterior and interior of all three wings of Custom House to accommodate a change of use.

SAVE submitted a detailed statement against the previous scheme to the public inquiry in 2022, which majored on our concern that public access to the Custom House is critical to

020 7253 3500
office@savebritainsheritage.org
savebritainsheritage.org
@savetoreuse

SAVE Britain's Heritage
70 Cowcross Street
London EC1M 6EJ
Charity No. 269129

protecting its historic significance and future use. The plans were refused by the Planning Inspectorate on heritage and planning policy grounds.

Significance
SAVE has submitted extensive evidence in relation to the previous planning application (20/00631/FULMAJ) and listed building consent application (20/00632/LBC) for Custom House setting out the very high significance of this grade I listed building (LEN 1359193). The exceptional significance of Custom House is widely acknowledged, even though it remains comparatively little known to the general public because it has been largely closed to the public in recent decades.

We wish to reiterate that the historic function and public accessibility of Custom House makes a crucial contribution towards its heritage significance, as a public building that has shaped the development of the nation for hundreds of years. Through its historic role as a venue for traders to gather and the interested public to meet, to conduct business and transactions with government officials, and to exchange news and information, Custom House has played a huge part in the economic development of Britain, even greater than the Royal Exchange. At the heart of this building is the Long Room, which is significant for its historic public function as a meeting place. Similarly, the space around the Custom House building, which is crucial to its setting, was originally unfenced and open to the public, to the extent that sentry boxes were installed to control crowd behaviour, and seating was put in by the Metropolitan Public Gardens Association in 1891, followed by tree planting by the Office of Works in 1903.

Public access to the Quayside Terrace
We welcome the proposed, unrestricted public access to the quayside, which reflects and understands this space within its historic context and importantly has the potential to create an exciting new public realm for London.

We note, as stated in the Cultural Strategy (11 Feb 2025) that *"the Custom House quayside will be permanently accessible to the public, 24 hours a day, every day of the year"* (p.5). Allowing free public access to the quayside, without barriers or ticketing, to allow and encourage people to use this space, and/or take part in proposed activities such as food markets or small-scale performances is an important public benefit. There is the potential to increase and support use of the Thames Path.

To ensure that these significant public benefits are delivered and the quayside becomes a publicly accessible space all year round, we consider it is incumbent on the Local Planning Authority to guarantee this provision through a S.106 agreement.

020 7253 350(
office@savebritainsheritage.org
savebritainsheritage.org
@savetoreuse

SAVE Britain's Heritage
70 Cowcross Street
London EC1M 6EJ
Charity No. 269129

Public access to the Long Room
We support the proposal to allow community groups, charities and cultural organisations to book 24 morning, afternoon or evening slots per year, as set out in the Cultural Strategy. We wish to highlight missing details about booking system, which we consider should be set out in a S.106 agreement, including how a booking system will be run (for example whether this is to be managed by the Friends of Custom House group) and whether these booking slots will be evenly spaced throughout the year.

Cultural strategy
SAVE welcomes the proposed public benefits of the scheme provided through a variety of cultural spaces, including a ground floor route passing through the lobby, King's Warehouse and portico, and flexible gallery spaces and a cafe in the West Wing. We acknowledge the creation of an operations model to deliver these activities which proposes to establish a Cultural and Community Committee and employ a Curator and Culture and Community Event Officer.

We regard it of the upmost important that all public benefits proposed by the scheme are reinforced by a S.106 agreement to ensure the guaranteed delivery of this significant cultural offer.

Fabric alteration
On detailed matters relating to the historic fabric, we defer to expert assessment of the Georgian Group. With regard to the West Wing of the Custom House, we support plans to minimise change to the plan form of the original office spaces. We consider this is of paramount importance in order to retain the outstanding significance and rarity of this wing. The West Wing's virtually unaltered surviving layout strongly contributes to the building's significance as a whole.

Conclusion
SAVE is pleased that the current proposals are much improved from the previous scheme. We support the proposed public access to the ground floor, Long Room and Quayside Terrace. We consider it of paramount importance that these commitments are enforceable through a S.106 agreement.

Yours sincerely,

[redacted]

Lydia Franklin, Conservation Officer

020 7253 3500
office@savebritainsheritage.org
savebritainsheritage.org
@savetoreuse

SAVE Britain's Heritage
70 Cowcross Street
London EC1M 6EJ
Charity No. 269129

SOUTHWARK COUNCIL

LBS Registered Number: 25/OB/0019

Date of issue of this decision: 12/05/2025

LBS Reg. No.: 25/OB/0019 **Date of Issue of Decision:** 12/05/2025
Your Ref No.:

Applicant City Of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

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.'

At Custom House 20 Lower Thames Street And River Wall Stairs And Crane Custom House Quay

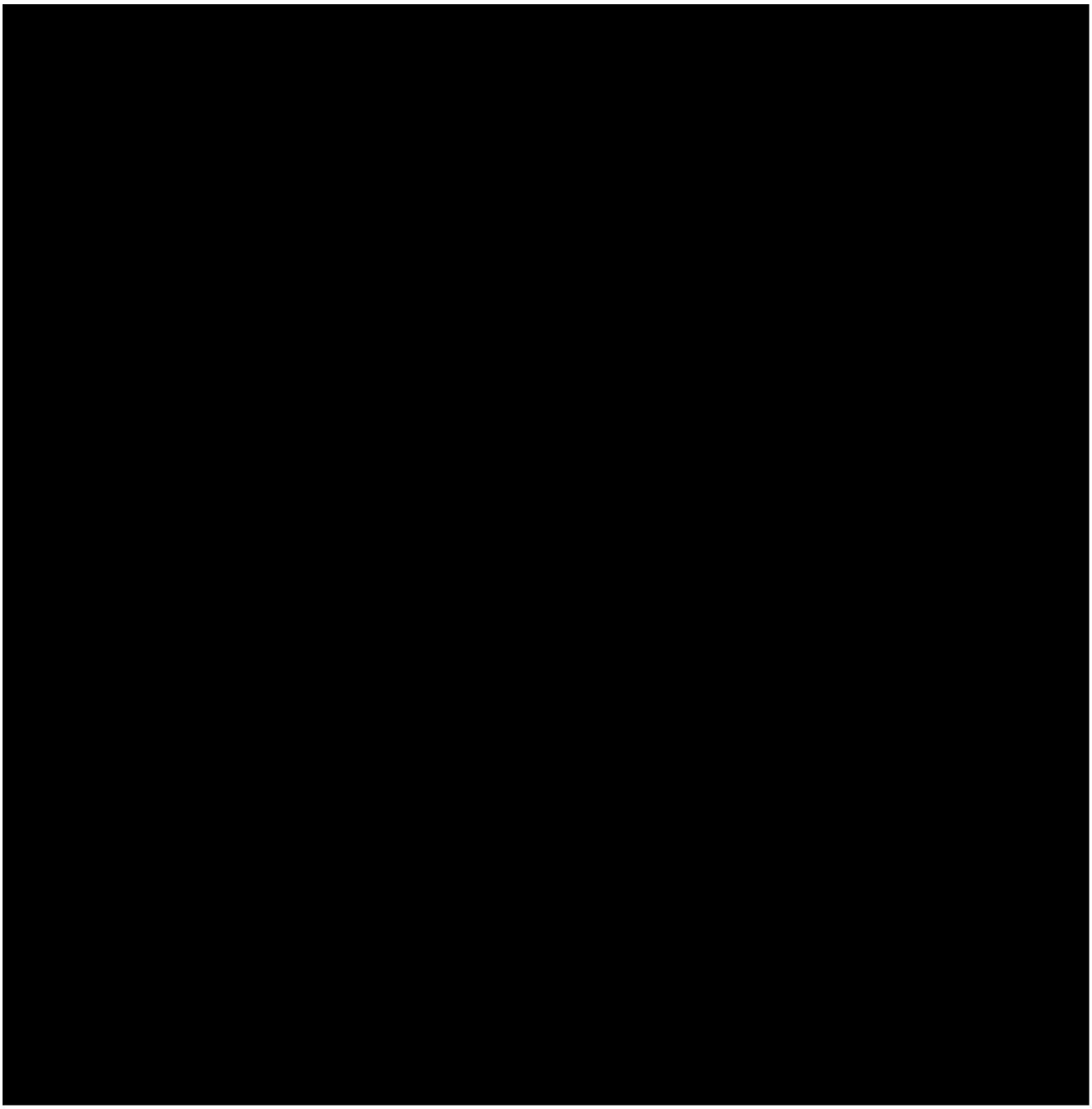
In accordance with your letter received on 9 April 2025 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

DECISION NOTICE

LBS Registered Number: 25/OB/0019

Date of issue of this decision: 12/05/2025



From: Jonathan Aubrey <[redacted]>
Sent: 14 May 2025 06:33
To: McBirney, Georgia <[redacted]>
Cc: Katherine Wood <[redacted]>
Subject: Re: GLA Review - 2025/0318 Custom House,

THIS IS AN EXTERNAL EMAIL

Thanks Georgia

Sent from Outlook for iOS

From: McBirney, Georgia <[redacted]>
Sent: Tuesday, May 13, 2025 8:38:59 AM
To: Jonathan Aubrey <[redacted]>
Cc: Katherine Wood <[redacted]>
Subject: RE: GLA Review - 2025/0318 Custom House,

Hi Jonathan,

Hope you are well and apologies for the delay in coming back to you.

From reviewing the application internally, we agree with yourselves that the application would not be referrable.

Apologies for any inconvenience caused.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 11th June returning on 23rd June
From the 15th September returning on 22nd September

From: McBirney, Georgia
Sent: 02 May 2025 07:48
To: Jonathan Aubrey <[redacted]>
Cc: Katherine Wood <[redacted]>
Subject: RE: GLA Review - 2025/0318 Custom House,

Hi Jonthan,

Thank you for your email below. I will check this and come back to you in due course.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:
From the 11th June returning on 23rd June
From the 15th September returning on 22nd September

From: Jonathan Aubrey <[redacted]>
Sent: 01 May 2025 16:15

To: McBirney, Georgia <[redacted]>
Cc: Katherine Wood <[redacted]>
Subject: FW: GLA Review - 2025/0318 Custom House,
Importance: High

> You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

HI Georgia,

I have discussed with my line manager Katherine (cc'd).

The City have referred the application under Category 3E "Development which does not accord with one or more provisions of the development plan… and comprises more than 2,500sqm of floorspace" – which would presumably be because the proposal involves loss of offices.

Tom (below) appears to indicate that from discussions with The City of London Officers it was not being referred under Category E or any other (previously it included height due to an extension in height).

Whether or not the scheme should be considered as a departure from the development plan at this stage is a matter for the LPA to decide on. The question is whether The City intended to refer the scheme under Category E. GLA Line Management are happy for it to be agreed to be non-referable if the City agrees.

Kind regards,

Jonathan

From: Tom Pemberton <[redacted]>
Sent: Thursday, May 1, 2025 10:12 AM
To: Jonathan Aubrey <[redacted]>
Cc: Georgia McBirney <[redacted]>; Gareth Fox <[redacted]>; Alex Nesti <[redacted]>
Subject: RE: GLA Review - 2025/0318 Custom House,

CAUTION: This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Jonathan,

Apologies for the delay in responding.

We were a bit surprised that the GLA had been consulted on this application, as our understanding was that the scheme would not be referable to the Mayor.

Of course, if the GLA should be consulted then we will follow proper procedure.

To avoid wasting time of officers, it would helpful if the GLA could provide a view on whether you consider the scheme to be referable? I have copied Georgia at the City into this correspondence for visibility and to provide clarity too on this point (apologies, but unless we've missed it, we're not sure we have received any reasons from the City?).

Look forward to hearing from you.

Kind regards,
Tom

TOM PEMBERTON (he/him/his)
ASSOCIATE

70 St Mary Axe, London, EC3A 8BE
[redacted]



From: Jonathan Aubrey <[redacted]>
Sent: 29 April 2025 12:53
To: Tom Pemberton <[redacted]>
Cc: Molly McAndrew <[redacted]>; Katherine Wood <[redacted]>; Sibghat Atif <[redacted]>; Alice Purcell <[redacted]>
Subject: RE: GLA Review - 2025/0318 Custom House,
Importance: High

HI Tom,

Can you send through WLC template (see below) and CE info (see below).Atif and Alice (cc'd) are the offices dealing with this aspect of the application.

The applicant has submitted a Circular Economy Statement in line with the published LPG (March 2022) which is welcomed. However, it does not appear that the Applicant has made available the completed GLA CE template (either on LPA planning portal or Arcus), despite this having been referenced in the written report. The GLA CE template contains key reporting tables and metrics. Whilst these tables appear to have been replicated in whole or in part in the written report, it would be beneficial to have the completed Excel version of the GLA CE template available for review to inform the Stage 1 comments.

Can you send through asap as it is holding up report drafting

Thanks

Jonathan

From: Sibghat Atif <[redacted]>
Sent: Monday, April 28, 2025 5:38 PM
To: Jonathan Aubrey <[redacted]>
Cc: Molly McAndrew <[redacted]>; Katherine Wood <[redacted]>
Subject: GLA Review - 2025/0318 Custom House,

Hi Jonathon,

Hope you are well. Regarding the Stage 1 consultation for 2025/0318 Custom House, the applicant has provided a WLC PDF report but not provided a WLC excel template. Please could you provide the WLC template so we can undertake a review?

Kind regards,
Sib

Sibghat Atif

Whole Life-cycle Carbon Officer

GREATER**LONDON**AUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

london.gov.uk

[redacted]

We are London. Find out about the work of the Mayor, the London Assembly, and the Greater London Authority. **https://www.london.gov.uk/**

GREATER LONDON AUTHORITY NOTICE:
The information in this email may contain confidential or privileged materials. For more information see https://www.london.gov.uk/about-us/email-notice/

This message has been scanned for viruses by the Greater London Authority.

Click here to report this email as spam.

We are London. Find out about the work of the Mayor, the London Assembly, and the Greater London Authority. **https://www.london.gov.uk/**

GREATER LONDON AUTHORITY NOTICE:
The information in this email may contain confidential or privileged materials. For more information see https://www.london.gov.uk/about-us/email-notice/

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

We are London. Find out about the work of the Mayor, the London Assembly, and the Greater London Authority. **https://www.london.gov.uk/**

GREATER LONDON AUTHORITY NOTICE:
The information in this email may contain confidential or privileged materials. For more information

see https://www.london.gov.uk/about-us/email-notice/

To: Georgia McBirney

From: Gavin McLaughlin and Nushrat Chowdhury

TfL Planning Reference: TFL/2025/0040

Borough Reference: 25/00270/FULMAJ

Location: Custom House; 20 Lower Thames Street

Custom House, City of London – TfL Comments

The site is bound by St Dunstan's Lane to the north, St Dunstan's Hill to the east, Lower Thames Street to the south, and St Mary at Hill to the west. Lower Thames Street (A3211) forms part of the Transport for London Road Network (TLRN) and TfL is therefore the highway authority.

The site has a public transport access level (PTAL) of 6b, on a scale from 0-6b, where 6b is the highest.

The site is within walking distance of Fenchurch Street, Tower Hill, Tower Gateway, Bank, London Bridge and Cannon Street, providing access to a wide range of London Underground (LU), London Overground, National Rail, and Docklands Light Railway (DLR) services.

The area is also within walking distance of stops for the 15, 48, 521, 21, 141, 17, 149, 43, 344, 40, 47, 133 and 35 bus services.

Cycleway 3 runs along Lower Thames Street directly outside the site. The nearest TfL Santander cycle hire docking stations are Lower Thames Street (Monument) - approximately 260m way; Monument Street (Monument) 300m; and Great Tower Street (Monument) 350m.

Strategic highway improvements

The application materials acknowledge severance and permeability issues for pedestrians caused on all sides of the site by the dominance of surrounding highway infrastructure. Despite this, north of the site, only a new lay-by for pick up and drop off by taxis and private hire vehicles has been proposed. It is acknowledged that this reflects a previous approach agreed with TfL for development proposals that were refused and unsuccessfully appealed.

TfL previously advised, and maintains, that their support for any new lay-by for any motor vehicles on the TLRN at this location is contingent on the provision by the development of a high-quality package of active travel mitigation to serve it and improve the wider area. This must include both robust and wide-ranging public access provisions for the quayside public realm areas proposed, and significant improvement works not only to the south, east and west, but also to Lower Thames Street A3211.

Widening of the existing pedestrian crossing at the far western end of Custom House's northern frontage is requested to form part of a section 278 (S278) agreement with TfL in its overall package of works for the TLRN. This must be secured by condition or in the section 106 (S106) agreement. A high-level scope of the agreed works should also be set out clearly in the planning decision. Decluttering the streetscape through removal of any unnecessary signal heads and

crossing infrastructure, subject to modelling and engineering feasibility, should also be considered.

The submitted RSA for the proposed lay-by on the TLRN has been carried out in accordance with TfL Procedure SQA-0170. Further discussion with TfL on the proposed design is nonetheless strongly advised, especially as crossing improvements need to be added to the overall works package.

Vehicular access and parking

As mentioned earlier, the site benefits from excellent local public transport and active travel accessibility. The proposals include a new vehicle drop off on Lower Thames Street. This will be 15m long to be able to accommodate a single coach or up to three taxis.

Whilst the taxi/coach drop off will represent a significant provision for access to the proposed development by private vehicles, due to the public realm improvements and active travel benefits also proposed at the riverside, on balance this is likely to be acceptable.

Step-free access adjacent to the taxi drop-off will clearly be important to consider as taxis provide safe, accessible travel options for those that require it. The design features proposed to enable this should therefore be secured as part of the planning decision.

Subject to pedestrian priority and severance north of the site also being addressed and appropriately mitigated by additional strategic highway improvements as requested, on balance, the proposed lay-by is acceptable, considering the destination character of the new use proposed, and a lack of step free bus services directly serving the site.

Currently, the site's vehicular access is in from Lower Thames Street to the north, the east-west TLRN corridor, to a car park south of the main building which faces the River Thames and River Wall. This riverfront car park currently provides approximately 100 spaces and is controlled by a security check point.

Delivery and servicing vehicles currently access via a single width vehicle ramp on the east side of the riverfront car park area down to the basement, where waste is currently stored and collected and there are 15 more sub-surface general car parking spaces.

The development proposal is car free except for proposed provision of two Blue Badge spaces on Water Lane. This is welcomed in line with London Plan Policy T6, especially the proposed removal of the existing private riverfront car park to create new public realm.

The removal of the existing car park is also welcomed in line with London Plan Policy D8, as it would maximise the contribution that the public realm makes to encourage active travel and ensure travel by car is discouraged. This also supports London Plan Policies T1 (Strategic approach to transport); T2 (Healthy Streets); and T3 (Transport capacity, connectivity and safeguarding).

The applicant should demonstrate how the proposed Blue Badge parking spaces will be accessible even when the proposed basement servicing areas are in use. The benches proposed on the journey between the Blue Badge parking and step free building entrances, to enable people with less mobility to stop and rest, are strongly supported.

It is welcomed that delivery and servicing activity would no longer occur along Water Lane, in line with London Plan Policy T4 Part F, and further detailed comments on the proposed arrangements for servicing are given below.

Cycle access, hire and parking

Cycle Superhighway 3 (Barking to Lancaster Gate) operates along Lower Thames Street itself, providing direct access for cyclists. Creation of the proposed vehicular lay-by must not have any detrimental impact on cycling journey times or reduce cycle priority.

The site also benefits from multiple existing TfL Santander cycle hire docking stations within reasonable walking distance. As a result, it is likely that no financial mitigation for cycle hire is necessary, provided that the walking routes to existing local provision are shown to be high quality in the ATZ assessment of the TA and mitigated with funding from the applicant if necessary.

Long-stay cycle parking is proposed to be located at basement level within a sheltered and secure cycle store. This would provide 24 spaces, including 4 short-stay spaces for hotel use, with two-tier stands for the majority and 2 spaces provided as Sheffield stands. This provision would meet London Plan standards from Policy T5.

There is a submitted Cycle Promotion Plan (CPP), with measures to promote cycling and use of the on-site cycle parking, along with methods for monitoring use and responding to feedback from cyclist visitors. The data and insights from the CPP should be fed into the Cultural Strategy and associated long-term management if possible.

There are 82 short-stay cycle parking spaces proposed in compliance with Policy T5 minimum requirements. However, provision to the south along the river is requested, and confirmation that the new quayside public space areas and onward links east and west along the river will be accessible to cyclists generally.

Sheffield stands proposed on the TLRN footway to the north may be supported but should form part of the earlier requested section 278 (s278) works and scope agreed with TfL by determination. The 15 proposed on Old Billingsgate Walk, with the northern most able to accommodate larger, accessible cycles, are strongly supported.

The delivery and design of all proposed cycle parking should be secured by pre-occupation condition.

Healthy Streets and public realm

Removal of the existing private car park on the River Thames north bank is proposed, to provide a new landscaped area of public realm, connecting the City Walkway along the River Thames.

This remains supported in line with London Plan policies T2 (Healthy Streets) and D8 (Public Realm). It would also improve Pedestrian Comfort Levels (PCLs) by widening the existing walkway currently restricted by the existing car park.

Pedestrian improvements through hard and soft landscaping are proposed on all sides of the site, which is also welcomed and strongly supported.

They include regrading of the footway on Lower Thames Street to provide level access into the building from the north, a widened and improved footway on the west side of Water Lane and a new raised table proposed to provide level access across that road, a substantial new public realm area along the Quayside to the south, with full inclusive access from the Custom House building via shallow ramps and other step free design features, and new resurfacing, stairs and ramped access to also serve pedestrians along Old Billingsgate Walk to the west.

Existing pedestrian access from the highway network to the north suffers from some considerable permeability and severance issues due to the lack of crossings and legacy highway infrastructure.

Walking westwards to Blackfriars pier and interchange along the Thames is currently possible but not directly outside and in front of the site's southern frontage at the river's edge due to the car park. Eastwards, the 'City Walkway' path cuts in away from the river for onward walking east to London Bridge, the Tower of London, Tower Hill LU and Tower Gateway DLR stations.

To address this the existing fencing and car park that currently separates the Thames path from the site would be removed, helping to create an expanded publicly accessible area more suitable for social activities, formal and informal play and social interaction during the daytime, evening and at night, in line with Policy D8.

Full public access to the quayside public realm should be secured in perpetuity, 24 hours per day and 7 days per week, throughout the year. Closures of very short duration to maintain landownership would be acceptable.

In line with London Plan Policy T2, safety measures are proposed in the form of street lighting and overlooking to ensure natural surveillance. The incorporation of green infrastructure in the form of soft landscaping within the quayside area and planters along the Thames Street footpath to green the public realm are also welcomed.

The proposed landscaping also takes into consideration flood risk mitigation requirements and includes Sustainable urban Drainage (SuDs) in line with London Plan policies SI, 13 and D8 part I, which is supported.

Trip generation

Analysis in the Transport Assessment (TA) indicates that the development proposal would be likely to result in fewer trips during the weekday AM and PM peak periods by private car and public transport modes, compared to the previous office building use. This is acceptable in principle in accordance with Policies T1 and T4.

Active Travel Zone (ATZ)

TfL welcomes that a night-time Active Travel Zone (ATZ) assessment, assessing five local walking routes, has now been provided for this development.

The ATZ proposes potential improvements to the street network at the junction of Mark Lane/Hart Street; the City Corporation are recommended to secure these through s278, s106, or works in kind, at their preference.

Proposals to re-surface and re-level the footway on Lower Thames Street and relocate street signage closer to the kerb line as part of the lay-by and access for all highway works are noted and agreed in principle, subject to full implementation via s278.

Full Pedestrian Comfort Levels (PCLs) assessment may be requested to ensure the crossings immediately surrounding the site are wide enough with sufficient capacity for all visitors at peak times.

Key opportunities for crossing improvements in the surrounding ATZ include north-south across the TLRN north-west of the site as earlier mentioned, and also at various points along King William Street where the City Corporation has recently announced a Pedestrian Priority Streets Programme project.

The ATZ route including King William Street that many visitors will use to access the site should be checked against the emerging City project to identify any necessary additional highway works further south, closer to Custom House, which may be required to ensure high quality walking conditions along its entire length from Monument.

Travel Plan

The largest room within The Galleries is proposed as a free-to-use engagement space for schools, community groups, charities and cultural organisations, which is welcome. The proposed commitment to ensure this space is bookable free of charge for groups between 10:00 and 17:00 each day should be secured in the s106 and cultural strategy.

TfL notes no end-of-trip facilities are currently proposed for cyclists to serve the hotel as a commercial use. Provision of end-of-trip facilities to enable hotel staff to cycle to work should be secured in the final Travel Plan.

Deliveries and servicing

TfL welcomes that a draft Delivery and Servicing and Waste Management plan has been provided. The final Delivery Servicing Plan (DSP) should be secured by condition or S106 as appropriate, and discharged in consultation with TfL due to the close proximity to the TLRN. It should follow TfL guidance, as required by Policies T4 and T7.

It is welcomed that all servicing would be conducted on-site in a dedicated yard at basement level, meaning that no servicing activity will take place along Water Lane, Lower Thames Street or the Quayside in close proximity to the Blue Badge parking. The overall proposals align well with London Plan Policy T7.

To maximise the extent of public realm on the quayside, the existing vehicle ramp to the south of the East Wing would be removed and replaced by a vehicle lift for deliveries and servicing. This is very welcome.

All delivery and servicing arrangements would be scheduled to occur outside of peak hours; this is welcomed in line with London Plan Policy T7 and relevant local policy, which seeks to minimise congestion and reduce road hazards.

Commitment to a maximum of 28 deliveries per day is proposed as per the prior scheme; this is acceptable subject to the effective management of deliveries entering/exiting the site, and the timed delivery restrictions, to ensure the safety of the public in line with Policy T7 Part G.

Construction and demolition

TfL welcomes the Outline Construction Logistics Plan (CLP) in line with London Plan Policy T7. The final and Detailed CLP should be produced in accordance with TfL's CLP guidance and secured by condition or S106 as appropriate, and discharged in consultation with TfL due to the close proximity to the TLRN.

The proposed hoarding around Lower Thames Street to facilitate the construction process will require a separate license with TfL.

It is welcomed that all construction vehicles would enter the site in forward gear from Lower Thames Street and exit in forward gear onto Water Lane before again exiting out via Lower Thames Street.

It is welcomed that there would be banksmen on-site to help manage construction vehicle movements, as well as traffic marshals employed throughout the construction phase. This demonstrates careful consideration has been given to minimising the impact of vehicle movements on the local road network and maintaining pedestrian safety at all times.

The Outline CLP also provides detailed information on the expected times of construction vehicle movements to and from the site. These should be managed to ensure that there is no queuing on the TLRN and disruption on the local highway network is minimised.

Summary:

1. **Further detail must be provided prior to determination for TfL to validate the design of the proposed highway works along the TLRN.**
2. **Thereafter, an updated Road Safety Audit and Designers Response to be submitted and approved by TfL. RSA to follow TfL RSA procedure SQA-0170.**
3. **Clarification on how the proposed Blue Badge parking spaces will be accessible when the proposed basement servicing areas are in use.**
4. **Sheffield stands proposed on the TLRN footway to form part of the S278 and agreed by TfL.**
5. **Clarification on the proposed cycle accessibility of the new quayside public space areas and links east and west along the river.**
6. **The applicant is required to provide end-of-trip facilities for staff.**
7. **TfL request a meeting with the applicant to discuss the submitted night-time ATZ assessment and other requirements for the surrounding highway to also ensure high-quality day-time active travel access.**

8. **TfL may request a Pedestrian Comfort Level (PCL) assessment to be carried out of the existing western crossing on Lower Thames Street prior to determination, for TfL to assess the impacts of the proposal's additional footfall on the crossing.**
9. **Widening of the existing western pedestrian crossing on Lower Thames Street to form part of the S278 agreement with TfL, to be secured by condition or in the S106, as appropriate.**
10. **A final DSP to be secured by a pre-commencement condition, discharged in consultation with TfL.**
11. **Full CLP secured by pre-commencement condition, discharged in consultation with TfL, and committing to Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety Standards (CLOCS).**
12. **The proposed hoarding around Lower Thames Street will require a separate license with TfL.**

Kind Regards,

Gavin and Nushrat

From: [redacted]
To:
Subject: RE: Custom House - Re-Consultation - 25/00270/FULMAJ and 25/00271/LBC
Date: 05 August 2025 15:47:02
Attachments: image001.png
image002.png

THIS IS AN EXTERNAL EMAIL

Good afternoon,

Application No: 25/00270/FULMAJ
Site 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: 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. (25/00270/FULMAJ)

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

This response is made as a Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Tom Li
Safeguarding Engineer (LU+DLR) | Infrastructure Protection
5 Endeavour Square | 7th Floor Zone B | Westfield Avenue | E20 1JN





From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 25 July 2025 11:17
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Custom House - Re-Consultation - 25/00270/FULMAJ and 25/00271/LBC

Dear Sir or Madam,

Please see attached a letter pertaining to a re-consultation for planning applications 25/00270/FULMAJ and 25/00271/LBC (Custom House 20 Lower Thames Street & River Wall, Stairs And Crane Custom House Quay London EC3R 6EE).

Kind regards,

Planning Administration

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

This message has been scanned for malware by Forcepoint. www.forcepoint.com

From: [redacted]
To:
Cc:
Subject: FW: Custom House - Re-Consultation - 25/00270/FULMAJ and 25/00271/LBC
Date: 08 August 2025 15:33:12
Attachments: Custom Hosue - Re-consultation Letter.rtf
Custom House rec cond_231726F.pdf

THIS IS AN EXTERNAL EMAIL

Hi Georgia
Thanks for reconsulting me on this application. The new plans do not affect my previous advice, which I have reattached for information
Regards
Helen

Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. For information about our use of your personal data please visit: historicengland.org.uk/terms/privacy

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 25 July 2025 11:17
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Custom House - Re-Consultation - 25/00270/FULMAJ and 25/00271/LBC

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir or Madam,

Please see attached a letter pertaining to a re-consultation for planning applications 25/00270/FULMAJ and 25/00271/LBC (Custom House 20 Lower Thames Street & River Wall, Stairs And Crane Custom House Quay London EC3R 6EE).

Kind regards,

Planning Administration

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

From: [redacted]
To:
Subject: Consultation response - - Custom House - Re-Consultation - 25/00270/FULMAJ and 25/00271/LBC
Date: 11 August 2025 10:47:35
Attachments: Custom Hosue - Re-consultation Letter.rtf
509029 Prev NE response.pdf

THIS IS AN EXTERNAL EMAIL

FAO Georgia McBurnie

Dear Madam,

Our ref: 521172
Your ref: 25/00270/FULMAJ & 25/00271/LBC

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated **15 April 2025**, reference number **509029** (attached).

The advice provided in our previous response applies equally to this **amendment** The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

Richard Gibson
Officer
Natural England
Consultation Service
Natural England, County Hall, Spetchley Road, Worcester, WR5 2NP
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england



Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-

submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see here
For further information on the Pre-submission Screening Service see here

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 25 July 2025 11:17
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 2025-08-15 - Custom House - Re-Consultation - 25/00270/FULMAJ and 25/00271/LBC

Dear Sir or Madam,

Please see attached a letter pertaining to a re-consultation for planning applications 25/00270/FULMAJ and 25/00271/LBC (Custom House 20 Lower Thames Street & River Wall, Stairs And Crane Custom House Quay London EC3R 6EE).

Kind regards,

Planning Administration

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or

the Environmental Information Regulations 2004, it may need to disclose this e-mail.

Website: http://www.cityoflondon.gov.uk

This message has been sent using TLS 1.2 This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

From: [redacted]
To:
Subject: EA Response to reconsultation for Custom House 25/00270/FULMAJ
Date: 13 August 2025 15:00:00
Attachments: NE 2025 138035 03 EA Response.pdf

THIS IS AN EXTERNAL EMAIL

Hi Georgia,

The amended plans do not change our position, please find attached our formal response, which reiterates our position with the 2X Planning Conditions.

If you have any queries please let me know.

Kind regards,

Harry

Harry Scott
Planning Specialist (Hertfordshire), Hertfordshire and North London Sustainable Places
Environment Agency | | Alchemy, Bessemer Road, Welwyn Garden City, AL7 1HE

[redacted]

Working days: Monday to Friday

This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

From: Gavin McLaughlin <[redacted]>
Sent: 15 August 2025 07:11
To: Patricio, Taluana [redacted]>; McBirney, Georgia
[redacted]>
Cc: McCallum, Kieran <[redacted] ; Elliott, Chris
<[redacted] ; Wilson, Peter <[redacted] ;
Nushrat Chowdhury <[redacted]>; Patricia Charleton
<[redacted]>
Subject: Re: Custom House, 20 Lower Thames Street - TfL

THIS IS AN EXTERNAL EMAIL

Dear Georgia

The draft Committee report you have sent is acceptable to TfL in principle.

TfL must be closely consulted throughout finalisation of the s106 due to the requirement for a s278 agreement on TLRN highway under our authority with the Pedestrian Comfort Levels assessment (PCLs) to confirm an appropriate design for north-south crossing upgrades.

Additionally relevant parts of the s106 and pages where the Committee report mentions this (2, 6 and 8) should be amended and updated to make clear that: "the above works may require strategic modelling to TfL standards with TfL or TfL-approved independent auditing at the Owner's expense."

The s106 agreement needs to specify an agreed scope of s278 works, you have made clear, but the works will also need to be subsequently designed, validated and delivered by the applicant, including all technical assurance, road safety audits and traffic modelling if requested, with any necessary auditing in full accordance with the TfL Transport Modelling Guidance (https://tfl.gov.uk/corporate/publications-and-reports/transport-modelling-guidance) and Model Audit Process (MAP).

Finally, in the applicant's recent response to you on Transport matters, Paragraph 7 states "The agreed deliveries cap does not include cargo bikes **and motorcycles.**" and "The cap also excludes...**facilities management vehicles** and associated emergency repairs activity which may occur to the Site."

These exclusions are unacceptable and should not be retained.

I will ask Nush and Patricia to take one final look and come back to you by close of play with anything essential I have missed.

Thanks and kind regards,

Gavin McLaughlin MSc; MA; MRTPI

Spatial Planning I City Planning

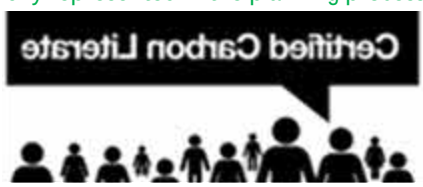
Construction Logistics Planning (CLP) - Advanced, CIHT/TfL-accredited course

M: [redacted]

[redacted]

PLEASE CONFIRM ALL MEETINGS BY CALENDAR

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process.



For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services

From: [redacted]
To:
Cc:
Subject: Port of London Authority Response (DC 284) Plan ref 25/00270/FULMAJ Custom House
Date: 15 August 2025 08:39:15

THIS IS AN EXTERNAL EMAIL

FAO: Georgia McBirney

Dear Georgia

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned application, with regard to works to the Custom House and its immediate environs, comprising: Change of use of existing building and riverside car park from office to a hotel-led mixed-use building comprising a hotel, basement spa & health centre, ground floor food and beverage, public north/south route, gallery and events spaces alongside 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. I have now had the opportunity to review the submitted planning documents and have the following comments to make.

The application states that the proposed development has been developed in line with draft City Plan Strategic Policy S17 (Thames Policy Area and the associated Riverside Walk Enhancement Strategy (2015) as the existing Thames-side car park that is currently fenced off and inaccessible to the public will be transformed into a new public square and riverside promenade that will be accessible to the public 24 hours day, all year round, with the existing fencing along the Thames Path removed . These proposals are welcomed by the PLA and are in line with the PLA Thames Vision 2050 Plan which includes the aim to see more people enjoying the River Thames and its banks. As part of the enhancements to the public realm here it must be ensured in line with the City of London's Thames Strategy Supplementary Planning Document (SPD) (2015) that appropriate Riparian Life Saving equipment (such as grab chains and lifebuoys) are retained and/or provided and the PLA's 'A Safer Riverside' guidance for developments alongside and on the Tidal Thames. (A Safer Riverside). The PLA requests that an appropriately worded condition must be added to any forthcoming planning consent requesting that such infrastructure is provided, in consultation with the PLA. In addition, it is noted that the existing river steps to the foreshore located in the southeast corner of the proposed development appear unchanged. Access to/from the foreshore via these steps must be retained as part of the development proposals.

On lighting, the external lighting assessment provides details of the external lighting for the scheme, which uses existing lamp columns and uplighters around the exiting trees. Section 9.11 (Public Realm Lighting) of the Design and Access Statement and the associated external lighting statement show appropriate lighting levels adjacent to the riverside. Within the application documents there are a number of references to potential events (such as Christmas markets and art displays etc) that could take place here in the future. The PLA should be consulted on such proposals as necessary, particularly on any temporary lighting, to ensure this is appropriate.

It appears from the proposed development a new outfall is proposed into the River Thames. To note all temporary and permanent works in, on or over the River Thames will require a River Works Licence with the PLA, and the PLA Statutory Consents and Compliance team should be contacted at lic.app@pla.co.uk This should be added as an informative as part of any forthcoming planning permission.

On transport, the PLA welcome that reference, including timetables is given in the Transport Assessment and Travel Plan to the nearby riverbus services available from Tower Pier, located a couple of minutes away from the proposed development. The Travel Plan highlights that staff of the proposed development will be provided with Travel Information Packs which will include details of nearby Public Transport Services. As part of this it must be ensured that riverbus service information is included in these packs. The application documents also state that a Delivery and Servicing Plan will be provided as part of the application. Given the closeness of the nearby Tower Pier, in line with emerging Local Plan policy VT4 (River Transport) consideration should be given to the potential role the pier could play as part of the delivery / servicing arrangements of the operational development.

I hope these comments are of assistance

Regards

Michael

Michael Atkins
Senior Planning Officer

Port of London Authority
[redacted]

Follow us at @LondonPortAuth

Find out more about our latest water safety campaign by clicking on the image below



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient, you are hereby notified that any use or dissemination of this communication is strictly prohibited, and asked to notify us immediately (by return email), then delete this email and your reply. Email transmissions cannot be guaranteed to be secure or error-free and Port of London Authority (PLA) does not accept any liability for any errors or omissions in the contents of this message. Any views or opinions presented are those of the author and do not necessarily represent those of PLA.

THE GEORGIAN GROUP

22/08/25

LPA References: 25/00270/FULMAJ & 25/00271/LBC

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

RE: Re-consultation due to the submission of revised plans

Dear Ms McBirney,

Thank you for consulting the Georgian Group on the revised plans submitted as part of the applications for Planning Permission and Listed Building Consent. The Group forwards the following advice to assist your local authority in determining this application.

Revised Proposals

The revised drawings relate to a change in the type of slate proposed for the eastern roof extension. The previous proposals specified slates that matched those on the existing eastern pitched roof and the western roofscape. Four options have been presented in the *East Wing Roof Study Document*, with Option 1 being the applicant's preferred choice. Option 1 proposes a 'light slate' that differs in colour from the slates used on both the western roofscape and the existing eastern roofscape.

The Group understands that the proposed slab beneath the plant enclosure is to be lowered by 340mm in order to maintain the existing height of the plant enclosure. This adjustment will reduce the overall height of the eastern roof extension.

The Georgian Group's Advice

The Group has reviewed the additional documentation submitted and, while we welcome the reduction in the height of the plant enclosure on the eastern wing, we would favour a slate colour that matches the western roofscape and the existing eastern pitched roof.

The *East Wing Roof Study Document* sets out the respective pros and cons of adopting either the lighter slate or the existing slate colour. In our view, the benefits of matching the existing slate outweigh those of the lighter option, particularly in terms of appearance and environmental considerations.

Using slates that match the existing would maintain the building's visual uniformity, preserve its tripartite arrangement and follow the existing character of the building. In contrast, introducing a lighter slate on the eastern roof extension would disrupt this uniformity and increase the visibility of the extension - ultimately to the detriment of views towards the grand southern elevation, as well as views along Lower Thames Street.

Recommendation

After reviewing the additional documentation, the Group recommends that the slate colour selected should match both the western roofscape and the existing eastern roofscape. This

6 Fitzroy Square, London W1T 5DX
020 7529 8920
office@georgiangroup.org.uk
www.georgiangroup.org.uk
Registered Charity No. 209934

Patron His Majesty King Charles III
Vice-Patron The Duchess of Argyll
Chairman Paul Zisman
Director Dr Anya Lucas FSA

approach preserves the character and uniformity of the building and ensures that the primacy of the central block is maintained in views towards the grand southern elevation.

Your authority should take these representations into account in determining the applications.

Yours sincerely,

Eddie Waller IHBC

Senior Conservation Adviser

London and South East England

This page is intentionally left blank

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.
Case Officer: Georgia McBirney

Customer Details

Name: Mr Mr Joseph Onofrio
Address: Harvel Crescent Bexley, London

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
- Other

Comment:Have been able to visit the Custom House last year and was given a guided tour of the building by the developers .
I was very impressed by the plans for the building and with the developers wanting to maintain many of the original features and ensure the history of the building is kept for future generations .
The developers have kept in touch with me and
other former colleagues re the history of the building and ensuring it's not lost or forgotten.
They very kindly arranged a number of tours of the building for a number of former & serving colleagues in 2024/25 which were very well received by all who visited the building.

The developers have our full support in their redevelopment plans of the Custom House .
I have a personal attachment to the building having worked in the building as a Customs & Excise Officer for nearly 41 years (1973-2014) ..
Joseph Onofrio
HMC&E/HMRC (Retired)

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.

Case Officer: Georgia McBirney

Customer Details

Name: Mr Alun Watkins

Address: 43 Marlborough Gardens, Lovelace Road, Surbiton kt6 6ng

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:I worked in Custom House from 1989 till it was sadly shut for good in 20121; alongside many colleagues, who I hope will also comment, I fully support this proposal to provide a new hotel to transform on one of the City's most iconic and historical buildings. A transformed riverside, previously denied public access, various dining options, a venue for cultural and other events and public access to historic parts of the building previously hidden from public view, will be a boon for London generally the City in particular. This building has been closed to the public for many, years and has worryingly remained totally empty since 2021; the opportunity to develop it sympathetically with a new public space along the riverside will provide a great amenity space for the City's worker, residents and visitors, opening a previously restricteded stretch of the Thames

path and providing unrivalled views South across the river will become a much loved attraction. The opening of a public route through the former Queen's Warehouse to the riverside is innovative and creative and brings the river back into public view. Custom House contains some amazing historic rooms, The Robing Room and, particularly, the Tide Waiters Rooms, are unique historical spaces rarely seen by the general public. The Long Room is a magnificent structure, again unique, and the lowering of high sills is a great idea which will bring the river into public view for the first time. many of the rooms in the West Wing are no longer suitable for modern working; many contain unique features never seen by the public, and the undertaking to maintain their historical integrity and character whilst bringing the building back into use is a wonderfull opportunity for future generations. This is a well thought out and planned transformatio which should be, in my opinion, supprted to the hilt.

From: [redacted]
To:
Subject: Re: Custom House Planning Application
Date: 16 April 2025 18:50:52

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

Apologies.
My address is:
5 Waverley Close
Oodiham
Hook, Hants RG29 1AT

Regards, Graham Bennett

On Apr 16, 2025, at 3:54 PM, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

Dear Graham Bennett,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

<image001.gif>
<image002.jpg>

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
[redacted] www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Graham Bennett <[redacted]
Sent: 10 April 2025 12:53
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Re: Custom House Planning Application

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

I strongly object to this application on the grounds that the proposed use of these premises is totally out of keeping with the historical use of these premises building and. the area in general.
Regards, Graham

On Apr 10, 2025, at 10:08 AM, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

Dear Sir or Madam,

Please see the attached letter pertaining to a new planning application at Custom House.

Kind regards,

Planning Administration Team
THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk
<25-00270-FULMAJ and 25-00271-LBC.pdf>

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.

Case Officer: Georgia McBirney

Customer Details

Name: Mr Joseph Onofrio

Address: Harvel Crescent Bexley, London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:City of London Planning Dept .

Made a comment several days ago but didn't receive an e mail acknowledgement ?

Wasn't sure if you received it or not ?

Mr J Onofrio

From: [redacted]
To:
Subject: Custom House
Date: 13 April 2025 15:44:50
Attachments: Outlook-Icon Desc

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

Your ref 25/00270/FULMAJ; 25/00271/LBC;

I am contacting you as member of the Custom House Ward and as a former customs investigator assigned to the building. I fully support the proposed changes to allow the building to 'move on' with purpose. The planning application seems sensible and logical.

My only please is that the developers don't forget the historical nature of some of the features, such as the Long Room etc. They may also want to consider the names of the bars in use during Customs days - Waxers and Harpy bars!

I look forward to seeing this exciting development take shape.

Best wishes

Martin

Martin Dubbey
Managing Director
Tel: [redacted]
Mob: [redacted]
Email: [redacted]
Address: 4th Floor, 10 Lower Thames Street, London EC3R 6AF
A company registered in England and Wales, number 07415697
www.harodassociates.com

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee, you should not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system. If you are not the intended recipient, you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

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.
Case Officer: Georgia McBirney

Customer Details

Name: Mr James Jarvie
Address: Birch House The Street Pettistree

Comment Details

Commenter Type: Other
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:Having spent many years working in the Custom House London (HMCE Investigation Division) I am impressed with the developers proposal to include an historical and cultural element in the building. The Custom House is a spiritual home for so many of us and we have so many memories. We are keen to have an area where we can display some of our significant smuggling operations for ourselves but also the wider public.
I fully support this application.
Jim Jarvie OBE

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.
Case Officer: Georgia McBirney

Customer Details

Name: Mr Graham Titmuss
Address: 18 Edgelaw Rigg Edinburgh

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:As a former HMCE Investigation Officer I spent many years working in this great building. It has too much significant heritage as a Pearl on the Thames to be ignored and the developers plans do full justice to the history of both the building and HMCE. It's often been said, if only the walls could talk.....their stories would keep guests entertained (and maybe blushing!) forever.....however as that is not possible the plan to incorporate some of our history and details of our not insignificant seizures/arrests is very welcome.
I fully support this application and look forward to seeing Custom House being back to it's magnificent best.

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.

Case Officer: Georgia McBirney

Customer Details

Name: Mr Graeme Stewart

Address: 36 Cherry Tree Park Edinburgh

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:As an retired HMC&E officer, and past occupant of the Custom House I recently travelled to London to see the presentation of plans by the developers. I was heartened to see that their plans took full consideration of the building's heritage and sympathetically make provision for the building's development for future generations to enjoy, whilst retaining the style, character and grandeur of the original building.

I therefore support the proposal to transform Custom House to provide a new hotel, with a reimagined public riverside, a range of food and beverage options, cultural events and exhibitions and public access to historic parts of the building.

Opening up the site with new public realm space along the riverside will provide many public benefits, improving accessibility along the north bank of the Thames, creating an attractive and usable public space with vibrant greenery and seating areas, and offering the opportunity for small scale cultural events. This will deliver an inclusive amenity space for the City, unlocking a previously constrained stretch of the Thames Path and allowing it to remain publicly accessible year-round.

I support the creation of a public ground-floor route through the former King's Warehouse, connecting Lower Thames Street and the riverside, alongside the proposals for greater public access to historic parts of the building, such as the West Wing, the former Tide Waiter's Room and the Long Room. This will enable people to share in the unique heritage of this historic building. I would certainly like to revisit it on completion and look forward to taking up that opportunity on a future visit.

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.

Case Officer: Georgia McBirney

Customer Details

Name: Mr Paul Bamford

Address: 4 Clare Way Bexleyheath

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:This is an historic building steeped in history and this application will ensure its upkeep and allow the public to enjoy this wonderful building as well as learn about the history

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.

Case Officer: Georgia McBirney

Customer Details

Name: Mr Adam Bourne

Address: Great Bounds Drive Tunbridge Wells Kent

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:I have worked in this magnificent building for many years and have heard about and studied the developers plans to create a hotel with areas for public accessibility. I fully support the application and strongly believe that the historical building will again come to life for generations to come.

Of all the ideas that have been floated over the years for the development of the Custom House, the current proposals being considered are far and away the most appropriate in my mind.

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.

Case Officer: Georgia McBirney

Customer Details

Name: Miss Joanne Pilmoor

Address: 22 Middleton Mews Brightlingsea Colchester

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:This building has enormous historical importance that needs to be protected and preserved for the enjoyment of future generations.

The Custom House and it's waterfront position is fondly remembered by the officers that used to work there, it was a sad day for nany when it closed.

Please ensure that the H.M Customs and Excise Heritage is preserved and ensure that key features of the building are used and accessible to the wider public to enjoy and treasure not just paying guests. If possible designate key areas of the building as a museum and art gallery space e.g The Long Room.

From: [redacted]
To:
Subject: CITY PLANNING REFERENCE NUMBER: 25/00270/FULMAJ
Date: 16 April 2025 21:36:32

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

Dear Sirs

I am writing, in a personal and rather small way, to support this Application.

I worked for many years in the historic Custom House, mainly during its time from the early 1990s to the early 2000s, when it housed the highly successful HM Customs & Excise Investigation Service.

We, who worked there, contributed to considerable and unprecedented national and global operational successes in combatting international drugs trafficking. HM Customs received international recognition as the centre of excellence in countering this pernicious trade. Added to this, the expertise of its officers led the law enforcement world in creating a global anti drugs money laundering regime which successfully seized billions of UK pounds, Dollars and Euros around the world. Furthermore, the Investigation Service controlled national and international law initiatives worldwide to lead in successfully combatting national and international VAT and financial fraud.

The building truly witnessed unique and unprecedented developments and successes in the UK's highest standards of international law enforcement. Yet another significant era in the old girl's history.

That is in the past of course, but I and others firmly believe that now, another unmissable opportunity presents itself to add another chapter in The Custom House's contribution to London and the City.

For nostalgic reasons I recently visited the building to see the Developers' plans and ambitions in converting it into a modern and luxury hotel. I firmly believe that this is an ideal commercial opportunity for this part of the City. I am also sure it can enhance the architecture, the landscape and unique historic location that is the City's north bank. I spoke with the Developers' and I was impressed with the way they propose to complement the structure, and its integrity whilst modernising this historic and listed building. I particularly welcomed opening the Custom House Quay which, over they years was a restricted area for security reasons.

In short, I think that the City planners have a fantastic opportunity to retain and enhance the life of such an historic landmark, whilst helping to reinvigorate the area and, perhaps most importantly, embrace the history that is the City.

I'm sure that the alternatives will risk it continuing to remain empty and inevitably falling into disrepair.

Therefore I, as just one, ask you, the City Planners, to approve the Application.

Yours faithfully

Emrys Tippett
3 Boscombe Close
Egham
Surrey
TW20 8LX



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.
Case Officer: Georgia McBirney

Customer Details

Name: Stephen Anchor
Address: Hillcrest Strakers Hill East Studdal

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:I am fully in support of this application as a pragmatic way to support the upkeep of this dearly loved and historical building. I have read the developers proposal and am very impressed with the sympathetic and considerate plans that take into account the historical context of the building.

I would very much like to use the facilities here when the works are completed and belive it will add a beautiful and valuable view and facility to the long overdue North Bank redevelopment

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.
Case Officer: Georgia McBirney

Customer Details

Name: Mr Iain Reitze
Address: 157 Sugar Quay 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
- Other

Comment:As a resident in Sugar Quay, a neighbour to customs House we think this application is an excellent idea.

It is such a magnificent building that is currently looking very tired.

The whole area will look much more attractive to tourists and locals a like and is sure to attract more visitors, create more jobs and generate more income into the area.

It will also become another iconic building to view from the river.

Fully support this and look forward to it.

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.
Case Officer: Georgia McBirney

Customer Details

Name: Mr David Whitehead
Address: 71, Sandy Lane, Middlestown Wakefield

Comment Details

Commenter Type: Neighbour
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
- Other

Comment:As an owner of a fifth floor apartment that overlooks Custom House I welcome these exciting proposals to breathe new life into this historic listed building.
The current tired exterior would benefit hugely from the comprehensive renovations and allow many tourists from around the world to enjoy this magnificent building and the fabulous views from it.
I wholeheartedly support these proposals and look forward to enjoying the (occasional) use of it when completed!

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.
Case Officer: Georgia McBirney

Customer Details

Name: Mrs Jackie Alexander
Address: 157 Sugar Quay, 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:As a Neighbour to customs house I am really excited for this project
The current building looks old, tired and dirty.
This Hotel will transform the space and offer a lot in the area to locals.
We have met the project managers and they are keen to embrace the heritage of the building and keen to work alongside the locals .

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.
Case Officer: Georgia McBirney

Customer Details

Name: Mr Andrew Sampson
Address: 41 New Jubilee Court Grange Avenue Woodford Green

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:- I would like to express my support for the proposal to transform Custom House to provide a new hotel, with a reimagined public riverside, a range of food and beverage options, cultural events and exhibitions and public access to historic parts of the building.

- Opening up the site with new public realm space along the riverside will provide many public benefits, improving accessibility along the north bank of the Thames, creating an attractive and usable public space with vibrant greenery and seating areas, and offering the opportunity for small scale cultural events. This will deliver an inclusive amenity space for the City, unlocking a previously constrained stretch of the Thames Path and allowing it to remain publicly accessible

year-round.

- I support the creation of a public ground-floor route through the former King's Warehouse, connecting Lower Thames Street and the riverside, alongside the proposals for greater public access to historic parts of the building, such as the West Wing, the former Tide Waiter's Room and the Long Room. This will enable people to share in the unique heritage of this historic building.

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.

Case Officer: Georgia McBirney

Customer Details

Name: Mr Mark Henwood

Address: 15 Trinity Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:As a resident of the City I am totally in favour of this proposal. The current disuse of this historic building in the heart of tourist London is a scandal to the City. It is no more than a parking lot at present, or sometimes used as a filming set, and cut off from all public access. The narrow walkway alongside the river outside the Custom House railings is far too narrow for the volume of walkers using the Thames Path and this proposal would open up the whole bank; landscape the area; renovate the building; and provide leisure amenities for visitors and locals alike. It was mind-boggling to me that the Corporation rejected the previous application (especially given this is the same authority that approved The Tulip!). Hopefully this time good sense will prevail.

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.

Case Officer: Georgia McBirney

Customer Details

Name: Mr Cort Malmberg

Address: Flat 6 15 Trinity Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:I am a resident of the City, residing near Custom House, and strongly support this proposal. It has puzzled me as to why the site has been vacant and disused over the past several years. Its only purpose has been to serve as a parking lot with occasional filming. There is no public access and whereas there is so much life in the City, this site is eerie and uncomfortable to walk by at night. The proposal ensures that life returns to the building and significantly improves and opens the pathway along the Thames, which is currently too narrow and hemmed in by the railing. I do not understand why the prior proposal was rejected (it appears that the planning committee was more in favour of ensuring the site remains locked up and empty than in providing a means of public access). Hopefully this time proves successful.

This page is intentionally left blank

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

Summary

Background and proposal

The application relates to part of the Sugar Quay Jetty, which is located on the River Thames near the City of London's border with Tower Hamlets - it measures approximately 965m². Currently there are no physical barriers to the public to access any part of the jetty, however the central section of the jetty (grey on image 1 below) is private land. The red shaded area on image 1 is accessible to the public.

The proposal seeks to use the central, private, area of the jetty, c.365m, for seating and service associated with the permitted ground floor commercial unit - with proposed customer service hours from 9am to 9pm. The new scheme includes perimeter landscaping with public-facing benches to enhance the public area of the jetty.

Approximately 600m² of the jetty (the perimeter area, shaded red in Image 1 below) would remain unobstructed and open to the general public. The division between the private and public areas of the jetty is not in conflict with the extant planning permission (14/01006/FULMAJ, issued 11 May 2016), which was subject to a Section 106 Deed of Variation (DoV) dated 11 May 2016 (see APPENDIX E).

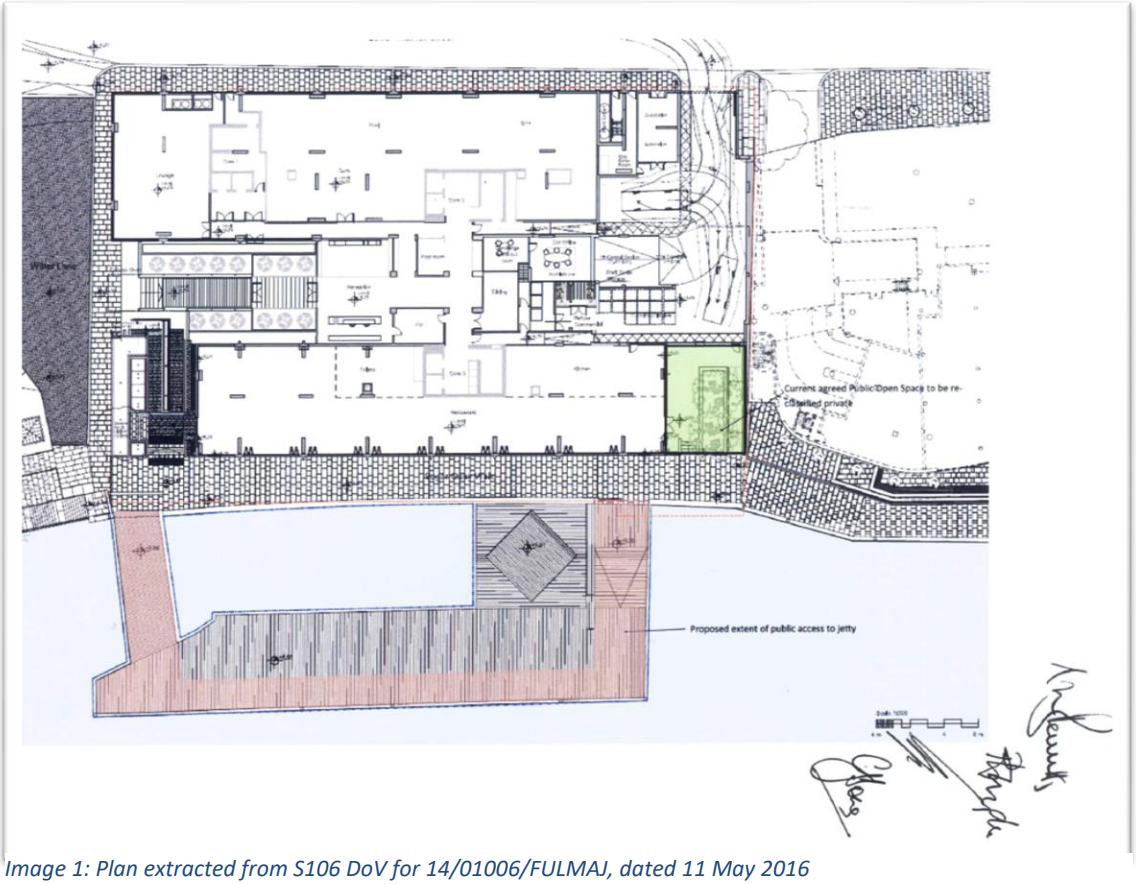


Image 1: Plan extracted from S106 DoV for 14/01006/FULMAJ, dated 11 May 2016

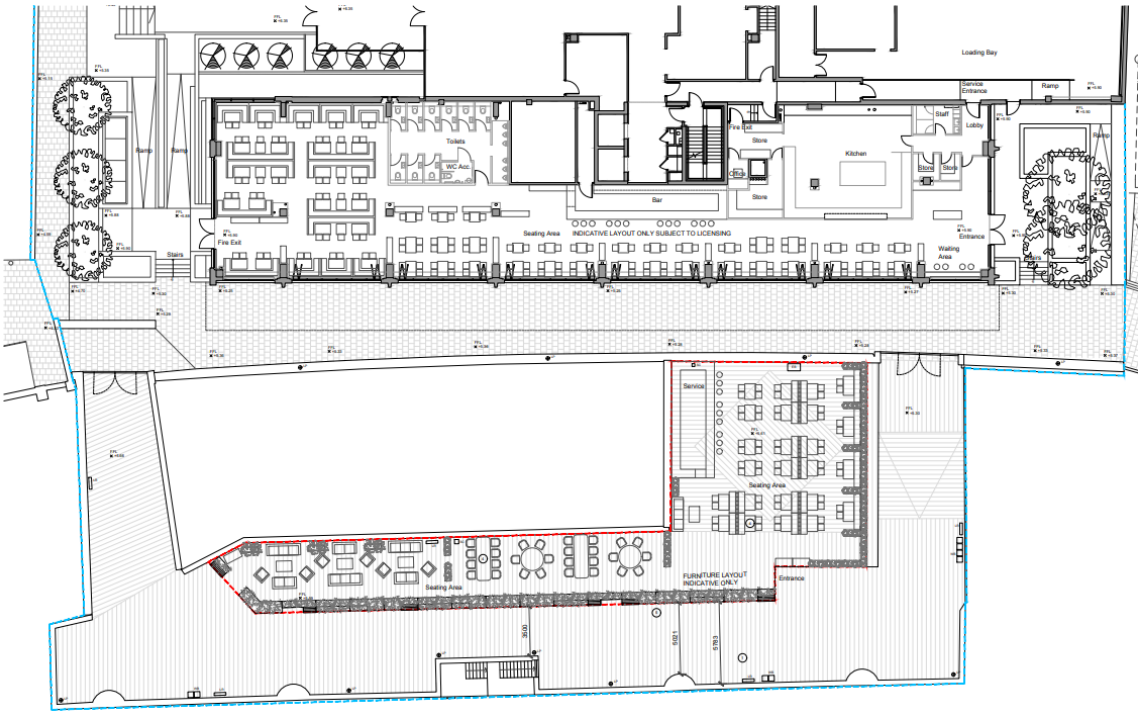


Image 2: Current seating proposal plan

Public access to the jetty was negotiated by officers, and first secured at planning committees in January and February 2016 via the DoV to Planning Permission 14/01006/FULMAJ, issued 11 May 2016), which is the operational permission of Sugar Quay itself. See APPENDIX C, D and E for the relevant committee report, committee minutes and DoV.

The current application site - the proposed seating area on the jetty– lies entirely within the area which was retained as private land under the 2016 planning permission 14/01006/FULMAJ (shown in grey on image 1 above).

As a result of officer negotiations during the assessment of the current application, the seating area (Image 2) has been amended to occupy a smaller area than the retained, ‘private’ area (Image 1). Further details and explanation of the planning history are provided from paragraph 12 below.

The adjacent Sugar Quay building is primarily residential at above ground level and has been occupied since c.2018. The permitted ground floor commercial unit (formerly A1-A4, now Class E/Sui Generis) remains vacant.

59 objections have been received, primarily from Sugar Quay residents. The broad themes of objection include:

(a) the potential for noise and disturbance to harm residential amenity from the proposed use,

(b) perceived loss of 'public space',

(c) additional congestion and safety concerns relating to the proposed use.

These matters are addressed in detail in the following report.

Amenity impacts

The potential for noise of customers using the seating area to cause a disturbance to nearby residents is one of the main issues raised by objectors. Objectors have commissioned a noise impact assessment (RBA, January 2025) in response to that submitted by the applicant (Quantum Acoustics, November 2024). There are a number of professional disagreements between the two assessments.

Officers acknowledge that the proposed use of the jetty would likely result in additional sources of noise, which has potential to cause a disturbance to the adjacent residents of Sugar Quay.

However, it is noted that the site (and the nearby residential development) is located in the Central Activities Zone (CAZ) and is adjacent to a well-used City Walkway and the busy Thames waterway. Owing to its location, the jetty is already a well-used public space, which has iconic views of Tower Bridge and therefore has an inherent busy character, and high levels of background noise that would be reasonably expected.

To mitigate this, the existing apartments on the upper levels of Sugar Quay were designed and constructed with a high specification of sound attenuation

including triple glazed windows, mechanical ventilation and comfort cooling. Taking the high specification into account, officers are of the view that residents would be able to mitigate against any increased noise levels that would likely result from the proposed use of the jetty.

Notwithstanding, it is acknowledged that the balconies, some of which are directly facing the jetty, and that residents with windows open would benefit from less mitigation. The main impact to consider therefore is that upon residents' enjoyment of their balconies, and internally if windows are open during noisy periods.

In order to address and minimise potential impacts on the amenity of surrounding residents as well as the area generally, conditions are recommended including a customer closing time no later than 9pm, seated service of customers only and max. capacity of 157, and details of an operational management strategy and its approval to be secured by conditions.

Subject to compliance with recommended conditions, officers suggest the impacts would not be so harmful to warrant refusal of the planning application. Although there would be a noticeable impact during the opening hours for some residents using their balconies or with windows open, the customer closing time of 9pm and latest close-down time of 9.30pm would ensure that this would not unreasonably impact any residents during expected quiet hours, and further controls stemming from the operational management plan, and seated service only conditions, would ensure noise levels are controlled by future operators.

Officers therefore do not consider the proposed use would significantly reduce the enjoyment of residents' homes resulting from any noise impacts, which can be suitably managed.

Land use and 'Loss' of open space

The S106 Deed of Variation, associated with 14/01006/FULMAJ dated 11 May 2016 requires the developer to *keep the part of the jetty shaded red on the Jetty Plan* (see Image 1 above):

a) *Unobstructed (save for any objects which may be approved in writing by the City Corporation); and*

b) *Open to the public and free of charge for pedestrian access for recreational purposes at all times of the day and night throughout the year.*

Despite the S106 obligation specifying that only the red shaded area must be unobstructed and open to the public - all of the jetty has been open to the public, as there has never been a delineation of the private area. This has led to the public perception that the entire jetty is "public open space", and that the proposal would result in the loss of part of this.

However, the S106 DoV related to the extant permission is clear that the central area of the jetty was to be retained as private, and officers considered this to be acceptable at the time of the decision, which is evidenced by the committee report and legal agreement associated with 14/01006/FULMAJ dated 11 May 2016.

Therefore, there would be no loss of public open space resulting from the proposal.

Notwithstanding this, in order to offset the sense of openness that would be lost, the proposed landscaping and seating is proposed, to improve the appearance and public usability of the jetty, which is considered to enhance the public space.

Whilst the proposed separated commercial seating area would physically reduce the space that is currently accessible to the public, this is acceptable in the context of previous planning decisions, and because the retained public areas of the jetty would be enhanced by seating and landscaping.

Furthermore, the proposed use of the jetty aligns with local plan policies DM3.5 and DM11.1, Emerging Policies CV5 and S6 as well as London Plan Policies: HC6(6) which requires planning decisions to protect and support evening and night-time cultural venues such as restaurants, pubs, night clubs, theatres, cinemas, and music and other arts venues.

The use is also supported by Policy CS9 of the Local Plan and Strategic Policies S17 and S19 of the Draft City Plan 2040. These policies support the activation of riverside spaces for appropriate commercial, leisure and cultural uses, encourage improvements to the public realm, and promote the vibrancy of the Thames waterfront as part of the City's wider Destination City strategy.

The proposed use would support the aims of Destination City, and is consistent with the location of the site within the CAZ, as well as supporting the evening and night time economy.

The application also supports the aims of Local Plan Policy DM20.3 (Retail uses Elsewhere in the City), as the space would provide enhanced local facilities for the City's workforce, enhance vibrancy, and improve existing active frontages, by increasing the potential for the existing ground floor commercial unit to come into operation.

Congestion and safety

In terms of congestion and safety, the submitted transport assessment confirms that the resultant pedestrian conditions will be acceptable, and that the jetty area could safely be served by staff of the restaurant, subject to further details to be secured as part of the operational management plan.

Summary

The proposed use of the application site for seating and service, in connection with the existing lawful of the ground floor of Sugar Quay is therefore considered acceptable.

The proposed use is supported in this location, as it would add to the vibrancy of this area, enhance the existing public open space, whilst also providing local food and beverage facilities for the City's workforce and tourists, and support strategic aims including 'Destination City'.

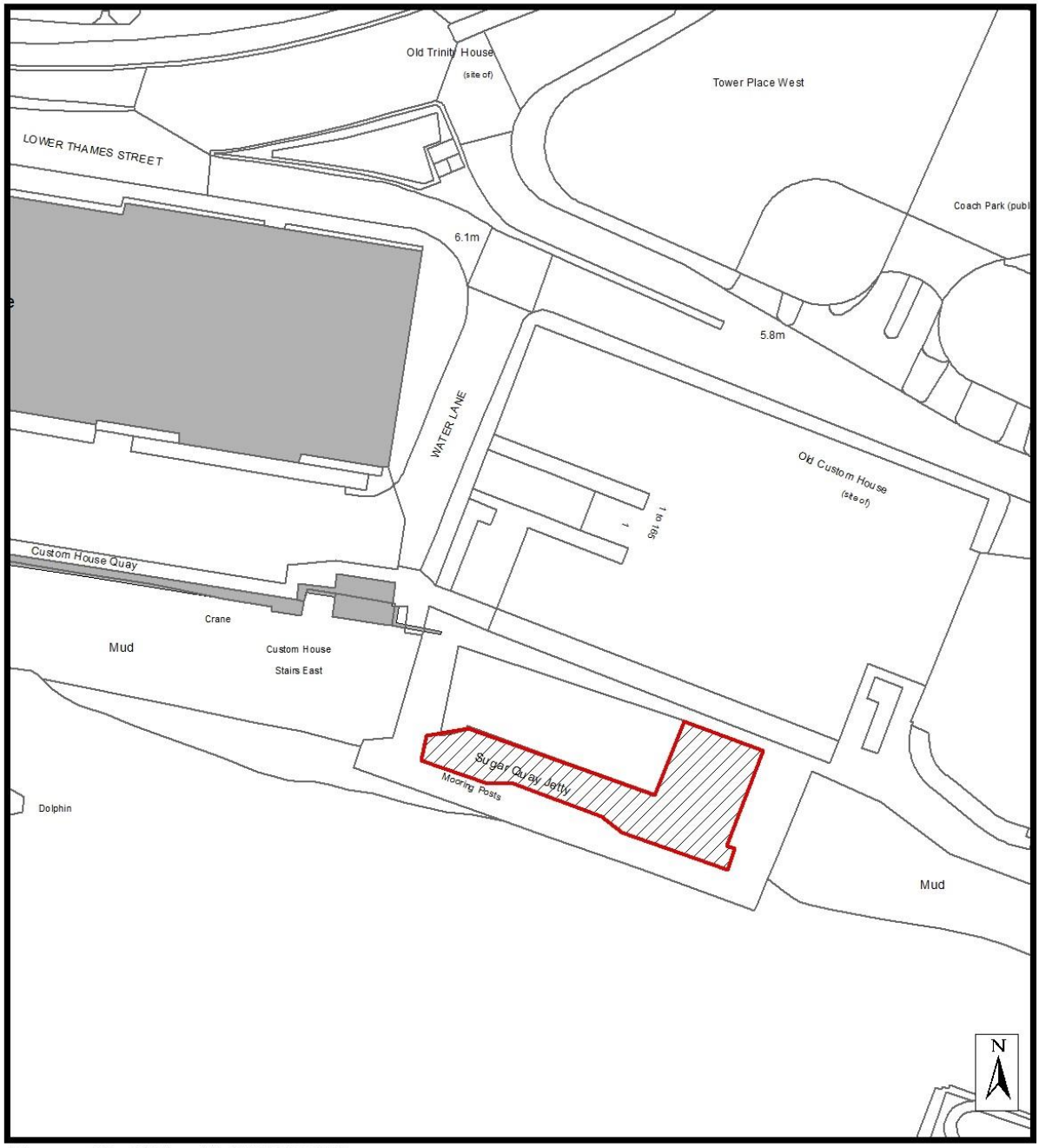
Subject to the recommended conditions, it is not considered that the proposal would result in unreasonable levels of harm to neighbouring residential amenity, nor the local transport network and planning permission is therefore recommended to be granted.

Recommendation

That subject to the recommended conditions as set out under the heading 'Schedule 1', the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule.

SITE LOCATION PLAN

Site Location Application Plan



© Crown copyright and database rights 2025 OS 100023243

ADDRESS:
Sugar Quay Jetty, Sugar Quay Walk

CASE No.
24/01196/FULL

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT



Photo 1: Sugar Quay Walk and Jetty - taken from western gate to jetty

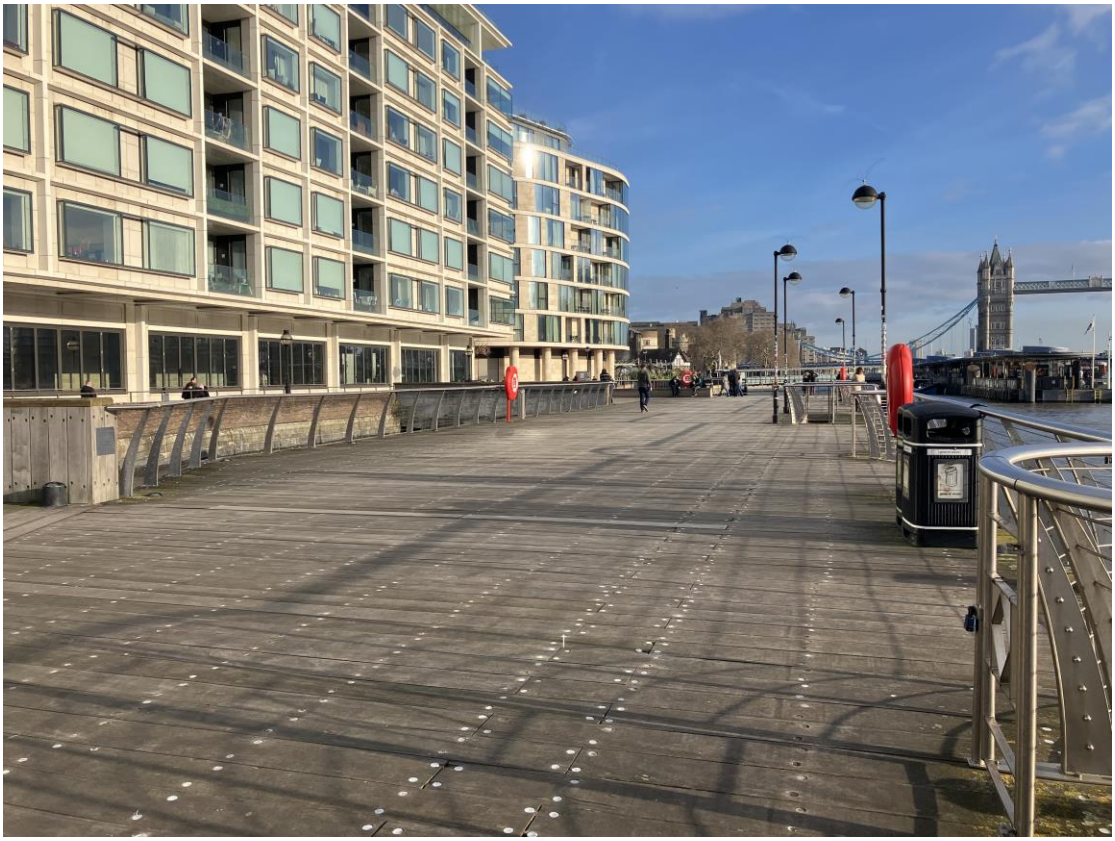


Photo 2: Sugar Quay Jetty, includes proposed seating area



Photo 3: Sugar Quay Apartments front elevation (0.5 zoom)

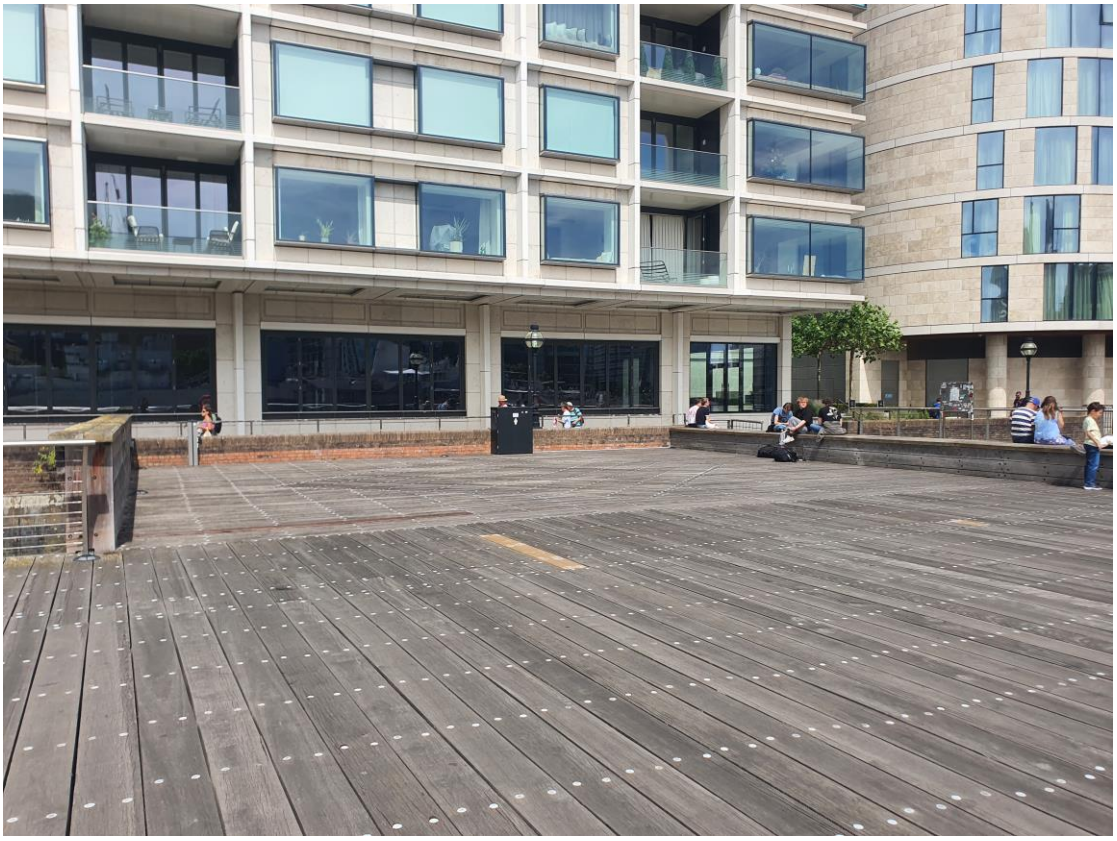


Photo 4: Eastern side of Jetty / front elevation of Sugar Quay Apartments



Photo 5: Sugar Quay Walk - taken from eastern end of Sugar Quay building

Main Report

Site and Surroundings

1. The application site is part of the jetty known as Sugar Quay, and is located to the south-east of the City of London, fronting the River Thames, close to the border with Tower Hamlets.

2. The total area of the jetty is approximately 965sq.m, and its entirety is currently accessible to the public. Access can be controlled using two gated entrances from Sugar Quay Walk, however 24-hour public access to the perimeter walkway of the jetty is guaranteed by a legal agreement in connection with planning permission 14/01006/FULMAJ.

3. There are four mooring posts and a gated stepped access down towards the river. There are several litter and recycling bins as well as life-rings placed around the perimeter of the jetty.

4. The use of the existing building known as Sugar Quay is primarily residential. The commercial unit at ground level remains unoccupied.

5. There are clear views towards Tower Bridge and the Tower of London, as well as across the river to the HMS Belfast and the Southwark skyline from the jetty, which makes it a popular spot for people to dwell. There is a long wooden structure to one end of the jetty, which is used as an informal sitting place.

6. There is a busy pedestrianised walkway between the Sugar Quay building and the jetty, known as Sugar Quay Walk, which is part of the riverside walk, and is designated City Walkway.

7. The surrounding area is characterised by the riverside walk, the Sugar Quay building, and the jetty itself, which has a prominent location on the river bank. Immediately to the east of Sugar Quay is Three Quays Walk, the ground floor of which is in use as a restaurant, and features outdoor seating fronting the river within ‘pods’.

8. The border with Tower Hamlets lies approximately 80m to the east of the jetty, and Custom House is to the West.

9. The site is not in a Conservation Area and the property is not listed. The nearest listed buildings is Custom House (Grade I) however the proposal would not impact upon its setting. The site is within the Tower of London World Heritage Site Local setting area.

10. The application site lies above the River Thames, which is designated as a Site of Metropolitan Importance for Nature Conservation (MSINC).

These sites represent London's most valuable ecological assets and are afforded a high level of protection in the planning system. While the Sugar Quay jetty is a man-made structure and not part of the riverbed or natural habitat, its location above the Thames means that ecological considerations remain relevant.

11. There are no other designations or constraints relevant to the Site or the proposals.

Relevant Planning History

12. At its meeting on 22 March 2013, the Planning and Transportation Committee granted Planning Permission (**12/01104/FULM, dated 16 September 2013**) subject to a S.106 agreement for:

    Demolition of the existing building and construction of a new building of basement, ground and part 9, part 11 storeys plus plant comprising 165 residential units with associated residential facilities and 658sq.m. of retail / cafe and restaurant (A1-A4) use at ground floor, creation of vehicular access point from Lower Thames Street, works of hard and soft landscaping and ancillary works (total area 26,030sq.m. GEA).

13. At its meeting on 12th January 2016, the Planning and Transportation Committee resolved to grant Planning Permission (under Section 73 of the Town and Country Planning Act for application reference **14/01006/FULMAJ, dated 11 May 2016**) for: *Variation of condition 53 (adherence to the approved plans) of planning permission reference no. 12/01104/FULMAJ dated 16th September 2013 to make minor material amendments to the permitted scheme including lowering of the first floor soffit level and repositioning of the two north cores, rationalisation of restaurant deliveries and refuse collection, facade and landscaping improvements, changes to the internal configuration of residential units and associated works.*

14. Members resolved to grant the permission under Section 73 of the Act, subject to a Deed of Variation to the S106 agreement (for 12/01104/FULMAJ, dated 16 September 2013), which required the Committee's approval once it had been negotiated by officers with regard to public access to the jetty.

15. Following the Committee's resolution of the 12th January 2016, the Deed of Variation was subsequently considered at the Committee's meeting on 23rd February 2016. The Committee agreed with officers

recommendation to approve, and resolved that a deed of variation should be entered into with an obligation to provide 24-hour public access to the Sugar Quay jetty. This report includes a plan which shows the extent of the area to be retained for public access under the agreement (in red shading). See Image 1 above.

16. The officers' committee report (see APPENDIX C) for the above states at paragraph 42 with regard to public access of the jetty: *"In order to mitigate the impact of the lower headroom, the applicants have agreed to provide public access to the Sugar Quay jetty which they own. A pedestrian route is proposed around the* perimeter *of the jetty." At paragraph 43, it states "The public route would be approximately 6m wide between the riverbank and the front of the jetty and 3.5m wide along the frontage to the river. The remainder of the jetty would remain private."*

17. The development, subject to this permission has been completed, and the residential element of the building has been occupied since approximately 2018. The approved retail/restaurant/drinking establishment (previously Use Class A1-A4, now Class E, Sui Generis) at ground floor has remained vacant since completion.

18. The entire jetty has remained open and accessible to the public in the meantime, including the retained 'private area' as no physical barriers have been erected to demarcate the areas.

Proposals

19. Planning permission is sought for the use of part of Sugar Quay Jetty for seating and service in association with the lawful restaurant and/or drinking establishment (including with expanded food provisions) use (Sui Generis) located on the ground floor, together with associated works including installation of furniture, and perimeter planters and benches.

20. The part of the jetty (c. 365m² of a total 965m²) proposed to be used for seating is private land, and this is shown in documents approved under permission 14/01006/FULMAJ. The proposed retained extent of public access is consistent with that permission. The extent of the private area to be delineated is smaller than the area shown on the plan approved by committee in February 2016 (Image 1 above).

21. The customer service hours on the jetty for the restaurant and/or drinking establishment are proposed to be 9am to 9pm.

22. Associated works include installation of raised planters around the perimeter of the proposed commercialised seating area, with integrated benches, and includes recessed areas where wheelchair users could sit.

Consultation

Statutory Consultation

23. Environment Agency: No objections raised. They have provided the following advice to the decision maker: *We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage.*

24. Port of London Authority: No objections to proposed use. Welcome the maintenance of existing access stairs on the south side of the jetty which would provide opportunities for third party users to benefit from access to the river for river related uses. *They have requested a condition requiring continued investigation into the potential to utilise and promote the site for river related uses.* Officers do not consider this condition to be directly relevant to the current application, so it cannot be included as a condition of development, however an informative will be added drawing the applicants attention to this.

25. Lead Local Floor Authority (LLFA): Initially objected due to a lack of information. Following submission of additional information, the LLFA have withdrawn the objection, and confirmed they have no further comments.

Internal Consultations

26. Environmental Health Officer: Concern has been raised with respect to potential noise and disturbance resulting from patrons and set-up and close-down activities on the jetty. However, a number of conditions have been recommended to mitigate against these, should the application be approved. These are to include restriction on opening hours with a closing time no later than 9pm every night, restriction to allow table service only, no music to be played on the jetty, no promoted events and submission of a detailed operational noise management plan. This is discussed in full in the Amenity Impacts section of the report.

27. Licensing Officer: No objection from a licensing perspective.

28. Waste Division: No objections.

Public and neighbouring Consultations

29. As part of the current application, the City of London Corporation acting as the Local Planning Authority ('LPA') has undertaken consultation with neighbouring residents in line with statutory duties.

30. Neighbour letters were sent to 331 surrounding residential properties; site notices were posted on 12 December 2024 and 02 January 2025, and the application was advertised via a press notice in City AM on 29 April 2025, and in the 'weekly list' of 10 December 2024.

31. Following revised plans being received, an additional consultation was carried out on 14 May 2025 by the City Corporation, notifying all those who had previously been contacted and/or who had responded to the initial consultation.

32. In response to the consultations, 59 objections were received. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below. These are summarised into key 'themes' of objection, and officers' response to the comments is provided.

33. Officers are also aware of a petition online which has approximately 1,500 signatories.

Themes (Objection)	**Summary of issues raised**	**Officer Response / comments**
Increased noise pollution due to commercial operations	*Concerns about increased noise levels from customers, staff, and deliveries.* *Noise from customers of outdoor seating area, as well as service (i.e. bottles/glasses being transported) is expected to cause disturbance.* *Agent of change principle.* *Inadequate mitigation proposed by applicant.*	In consultation with Environmental Health colleagues, controls are recommended as follows: Opening hours controlled (9am-9pm) No music allowed. Table service only. Operational (including noise) Management Plan is

		recommended to be secured by condition. Further control will also be imposed via the licensing regime. Addressed in detail within the amenity impacts section of this report.
Perceived Loss of 'Public Space'	*The jetty is seen as a valuable public amenity used by residents, tourists, and local workers for relaxation, leisure, and enjoying views.* *There is the perception that using this space commercially would diminish public accessibility and enjoyment.*	Officers have negotiated amendments to the scale of the proposed seating area in pre-application discussion, and further during assessment and the applicant has agreed to reduce the area, in order to increase the retention of 'public' space, and to improve views towards the Tower of London WHS. The 'private' area of the jetty has been in private ownership since public access was originally secured in 2016 for the said area shaded in red. The majority of the walkway is to be retained as public space as part of this proposal. See 'land use' section below.
Transport, congestion	*Increased footfall and servicing of customers could lead to crowding and congestion in this already busy area.* *Reduced footway area on jetty to exacerbate this.* *Safety concerns associated with moving food and beverages across Sugar Quay Walk.*	Submitted transport assessment suggests the use would not result in unacceptable crowding. The public walkway area to be retained on the jetty is of sufficient width to ensure no unreasonable congestion. Safety concerns considered manageable through use of operational management plan condition.
Loss of residential amenity	*Concerns around loss of privacy to balconies.* *Potential for offensive odours.*	The proposal is not considered to present any additional overlooking opportunities.

		Management plan would detail cleansing regime to ensure use does not lead to offensive odours.
Public Safety	*Query raised whether the structure can take the additional loading proposed of tables and chairs etc.*	The Port of London Authority do not object to the application.
Conflict with building / jetty lease contracts and river woks license	*It is claimed the proposal would not be allowable under currently lease terms.* *It is claimed there is conflict with the River Works License dated 16 August 2019*	This is a civil, private matter, and is not considered necessary in the officers' assessment. The PLA, who issue river works licenses, have not objected to the proposal. Further, river works licensing is a separate process to planning.

34. A group of residents of Sugar Quay have instructed David Dadds, Barrister, to submit a letter of objection, dated 18th January 2025. The letter concludes with the following statement*: It is respectfully submitted, that the proposals should therefore not be considered acceptable on the grounds of noise nuisance and the loss of residential amenity, given the close proximity of the proposal to the residents' homes.* This is undersigned by 31 residents of 16 addresses within Sugar Quay. This objection is supported by a Noise Assessment Report prepared by RBA Acoustics, dated 20 January 2025.

35. An additional follow up letter, including updates to the RBA Acoustics report was submitted on 28 May 2025, following re-consultation. This reiterated previous concerns and updated the previous noise impact assessment. This is dealt by the officer in the Amenity impact section of the report.

36. The River Residents Group have submitted a letter of objection which they summarise as follows: *On the grounds that it will cause Significant Observed Adverse Effect on the residents of 164 adjacent apartments, who will suffer their quality of life diminished due to a major change in the acoustic character of their area as well as the loss of amenity space that has contributed to their health and well-being for years.* The letter contains a link to a petition "Prevent the Conversion of Public Jetty to Private Commercial Use" with 1,519 signatories This is dealt by the officer in the amenity impacts section of the report.

Policy Context

37. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this application are set out in Appendix B to this report.

38. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation on 18 April 2024. It was then submitted to the Secretary of State on 29 August 2024, and has completed the formal hearings of its Examination in Public at the time of writing this report. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 49 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

39. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2024 and the Planning Practice Guidance (PPG) which is amended from time to time.

40. The National Planning Policy Framework (NPPF) states at paragraph 2 that "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise".

41. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
    - approving development proposals that accord with an up-to-date development plan without delay;

42. Chapter 8 of the NPPF seeks to promote healthy, inclusive, and safe places.

43. Paragraph 92 states that planning decisions should aim to achieve healthy, inclusive, and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

Considerations in this case

44. The City Corporation, in determining the planning application has the following main statutory duties to perform:
    - to have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);
    - to determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004);
    - In considering the application, account has to be taken of the statutory and policy framework, the documentation accompanying the application, further information and the views of both statutory and non-statutory consultees.

45. The principal considerations in this case are:

    - The extent to which the proposals comply with the development plan.
    - The extent to which the proposals comply with the NPPF.
    - The acceptability of the proposed use of 'the site'.
    - The impact of the proposed development on the amenity of residential occupiers with regards noise, disturbance, overlooking and general amenity.
    - Transport impacts of the proposed development.
    - Whether the scheme is accessible and inclusive.
    - The impact of the development in design and heritage terms including special architectural and historic interest and heritage significance.
    - Duties under the Public Sector Equality Act (section 149 of the Equality Act 2010) and the Human Rights Act 1988.

46. There are polices in the Development Plan which support the proposals and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

Land Use

Policy

47. The site lies within the London CAZ, as well as the Thames and the Riverside Area (CS9 of Local Plan 2015), The Thames Policy Area, and the Pool of London Key area of change (S17 and S19 of emerging City Plan 2040.)

48. Paragraph 3.4.2 of the Draft plan state there is an opportunity to increase vibrancy and vitality in this area through greater use of the riverside walk, more leisure, retail and cultural public uses at ground level and the provision of publicly accessible spaces. The area will be regenerated through the redevelopment or refurbishment of appropriate riverside sites. The public realm and accessibility will be significantly improved, contributing to an improvement in air quality. A higher quality pedestrian route will be created between London Bridge and the Tower of London creating a continuous attractive riverside walkway free of motorised traffic. Easier pedestrian access across Lower Thames Street will encourage more City workers, residents and visitors to enjoy the riverside.

49. Policy CS9 seeks to ensure that the City capitalises on its unique riverside location by: Ensuring that buildings and spaces on or near the riverside contribute to sustainable economic growth and further the aims of the Riverside Walk Enhancement Strategy, particularly through:

- protecting public access and river views along the riverside walk;
- improving access to the river and riverside walk from the rest of the City and the Thames bridges;
- improving the vibrancy of the riverside by encouraging a mix of appropriate commercial uses whilst preserving privacy, security and amenity for residents, businesses and other stakeholders; and
- improving opportunities for biodiversity, in line with the City of London Habitat Action Plan for the Thames foreshore.

50. Policy CV5 of the emerging City Plan 2040: Evening and Night-Time Economy supports the growth of the evening and night-time economy in appropriate locations and requires proposals to demonstrate how impacts on residential amenity will be mitigated.

51. Strategic Policy S6 of the emerging City Plan 2040: Culture, Visitors and the Night-Time Economy promotes cultural and leisure uses that contribute to Destination City and encourages activation of public spaces and riverside locations for social and cultural uses.

52. Policy DM10.4 sets out the need to resist the loss of routes and spaces that enhance the city's function, character and historic interest.

53. DM16.2 - point 5 states public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary, and it is clear to the public that access is allowed.

Assessment

54. The lawful use of the ground floor of the existing building, granted under planning permission 14/01006/FULMAJ, dated 11 May 2016, is any of the following (as defined by the operational permission under the Use Classes Order 1987, which was in force at the time): shops (A1); financial, professional or other service (A2); restaurants and cafes (A3); and drinking establishments (A4). These use classes have been replaced by amendments to the Town and Country Planning (Use Classes) Order 2020 in recent years, which have established Class E covering a broad range of uses including retail, restaurants and cafes, offices, and other uses. Drinking establishments (including those with expanded food provision) are now classed as a Sui Generis use.

55. The City of London is within the Central Activities Zone (CAZ) as defined by the London Plan (2021), where the majority of London's night-time activities are concentrated.

56. The majority of the existing building at Sugar Quay is in residential use. The ground floor has a lawful use encompassing A1-A4 Use Classes, however it has never been operational. Notwithstanding, the lawful use of the ground floor is considered to be a use within the former Use Classes A1 to A4 (retail, restaurants and drinking establishments).

57. The current application is for the change of use of part of Sugar Quay Jetty, to restaurant and/or drinking establishment (including with expanded food provision), in connection with the lawful ground floor use. This would be classed as a Sui Generis use. The proposal is therefore an extension to an existing lawful use.

58. The section of the jetty that is the subject of the current application is private land, however it has been open to the public for a number of years with no barrier to demarcate the private and public areas of the jetty.

59. It must be noted that variation of condition application 14/01006/FULMAJ secured the original public access to the privately owned jetty in 2016. The report to the Planning Committee for its meeting held on the 23 February 2016 stated:

'the public route would be approximately 6m wide between the riverbank and front of the jetty and 3.5m wide along the frontage to the river. The remainder of the jetty would remain private.

Public access to the jetty offers a significant enhancement to the use of the riverside. The jetty has previously been in private ownership and

inaccessible to the public. Providing public access to this jetty represents a significant public realm benefit of in this key area of London, which mitigates the impact of the lower soffit on the sense of the openness of the Riverside Walk.'

60. The Committee resolved to grant the application subject to the above being secured as a Section 106 obligation. The S.106 agreement dated 11 May 2016.

61. Hence, from the previous decision it is clear that public access to the jetty was secured by the City as a significant public benefit, and this was considered necessary in order to mitigate against identified harm to the sense of openness of the riverside walk that would result from the amended development. The use of the jetty as a public space was a key design consideration in allowing the amendments proposed by the variation of condition application 14/01006/FULMAJ dated 11 May 2016, and therefore this must be retained as part of any future development.

62. The part of the jetty proposed to be used for seating under the current application is shown as private in documents approved under permission 14/01006/FULMAJ dated 11 May 2016. The proposed extent of public access to be retained is consistent with this permission, and with the legal agreement. It was made clear in this decision that part of the jetty would remain in private use, and that any future use would likely require planning permission. See Image 1 above, indicating as red shaded area the space secured for "public access", and therefore the non-red shaded / grey area to be retained as "private".

63. Officers therefore raise no objection to the land use principle of using the retained 'private' section of the jetty as a private external seating area in connection with the restaurant or drinking establishment (including with expanded food provision) at ground level of Sugar Quay. This is also subject to licensing. It is apparent from previously approved documents relating to 14/01006/FULMAJ, that part of the jetty was intended to be for private use, with a public right of way to be retained around the perimeter of the jetty.

64. It is noted that an operator for the ground floor use is not specified in the application, and therefore the exact nature of the proposed use is to be determined. The use applied for is Sui Generis, drinking establishment (including with expanded food provision) and/or restaurant, for outdoor seating in connection with the ground floor of Sugar Quay. As proposed, the jetty would not be able to operate independently as a drinking establishment or restaurant, and it would only be in connection with the use of the ground floor of the main building only.

65. The proposed use of the site is supported as it aligns with local plan policies DM3.5 and DM11.1, Emerging Policies CV5 and S6 as well as London Plan Policies: HC6(6) which requires planning decisions to protect and support evening and night-time cultural venues such as restaurants, pubs, night clubs, theatres, cinemas, and music and other arts venues.

66. The use is also supported by Policy CS9 of the Local Plan and Strategic Policies S17 and S19 of the Draft City Plan 2040. These policies support the activation of riverside spaces for appropriate commercial, leisure and cultural uses, encourage improvements to the public realm, and promote the vibrancy of the Thames waterfront as part of the City's wider Destination City strategy.

67. The proposed use would support the aims of Destination City, and is consistent with the site designation within the CAZ, as well as supporting the evening and night-time economy.

68. The application also supports the aims of Policy DM20.3: Retail uses elsewhere in the City, as the space would provide enhanced local facilities for the City's workforce, enhance vibrancy, and improve existing active frontages, by increasing the potential for the existing ground floor commercial unit to come into operation.

Land Use Summary

69. The proposed use of The Jetty represents an extension of the existing lawful ground floor use and aligns with both historic planning permissions and current policy frameworks. The retention of public access to the designated areas of the jetty ensures that the public realm benefits secured under the original Section 106 agreement are maintained. Furthermore, the proposal supports strategic objectives outlined in the London Plan, the Local Plan, and the emerging City Plan 2040, particularly in enhancing the vibrancy of the Thames waterfront and contributing to culture, and the evening economy. Subject to further operational details to be secured by conditions, the application is supported as a positive step towards activating riverside space in line with the strategic policy objectives.

70. The proposed use is therefore acceptable in principle, subject to the following matters.

Design and Heritage

Policy

71. Policy DM10.1 of the adopted local plan (2015) requires all development to be of a high design quality, respect the character of the surrounding area and to enhance the public realm. DM10.4 supports use of natural materials, soft landscaping and enhancements to improve visual amenity in public realm works. Policy DE3 (Public Realm) of the Draft City Plan 2040 echoes this.

Extent of Public Walkway

72. The public walkway would be retained, consistent with previous (extant) planning permission, as discussed in the previous Land Use section of this report.

73. The proposed perimeter planters would form a continuous boundary, which includes integrated seating facing the river. This would enhance the public route and prevent spillover from the private commercial use.

Design and Landscaping

74. The proposed design features durable, powder-coated metal planters in dark bronze, paired with integrated, grey-stained timber-slat benches matching the jetty's existing materiality. The timber-slat seating design facilitates water drainage to minimize weathering.

75. Planters would vary in height, with taller ones at the back for privacy and lower ones at the front. The proposed design features a clean, calm aesthetic and a material palette that is deemed appropriate and harmonious with the jetty's riverside setting. Material samples are recommended be reviewed as a condition to ensure durability, suitability, and the maintenance of the timber slat seating.

76. The proposed SuDS rain garden planters collect rainwater via downpipes, using a soil/compost mix to retain water for planting. The planting selection must account for wind tolerance, climate resilience, and the jetty's high-exposure conditions while enhancing biodiversity. A sample palette, guided by RHS recommendations for pollinator-friendly, drought-resistant, and wind-tolerant species, is essential to ensure the viability of the planters, and a landscaping planting and maintenance regime is recommended to be secured by condition.

77. The proposed layout of the seating area is indicative only, and will be determined by a future end user and with details secured via condition.

Fire Safety

78. Policy D12 of the London Plan requires all development proposals to achieve the highest standards of fire safety. Policy D5 of the London Plan requires development to be designed to incorporate safe and dignified emergency evacuation for all building users.

79. The proposal is not considered to be at significant risk or vulnerable to fire.

Access

80. The proposal would retain route accessibility, allowing two wheelchairs to pass, ensuring the jetty remains inclusive for a diverse range of users, including families, tourists, and the elderly, while maintaining space for public enjoyment.

81. Following advice from officers, an amended plan has been submitted, showing how public seating would include a recess where someone in a wheelchair could sit without projecting out into the access route. The seating should also incorporate some armrests for support, and final details of the seating are to be secured by condition.

82. The planting maintenance schedule should also include provisions to ensure that plants don't grow out and extend into the seating area so that people who have sensory information processing differences won't experience unwelcome touch and this would be secured by condition.

83. As the proposed seating area is indicative at this stage, as an end user has not been determined, it is considered reasonable to require an inclusive access management plan to be secured by condition. This should include details of the layout of tables and chairs, and details of accessible toilets to ensure the commercial use is inclusive for a range of users.

Design Conclusions

84. The proposal positively contributes to the site's usability, aligning with the aims of several City of London Local Plan (2015) policies, including DM10.4, DM16.2, CS9, DM19.1, DM19.2, DM10.8. It enhances the public realm by maintaining public accessibility and providing public

seating and added biodiversity. No objection is raised on design grounds, subject to conditions controlling the detailed finishes, accessibility features and landscaping.

Amenity

85. The NPPF (2024) paragraph 198 requires planning policies and decisions to ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions, and the natural environment. It emphasizes mitigating and reducing to a minimum potential adverse impacts resulting from noise from new development and avoiding noise that gives rise to significant adverse impacts on health and quality of life.

86. London Plan (2021) policies D13 (Agent of Change) and D14 (Noise) require development to limit and mitigate noise impacts, placing the responsibility for mitigating noise impacts on new developments.

87. Local Plan (2015) Policy DM3.5 (Night-time entertainment) and Draft City Plan (2040) Policy CV5 (Evening and Night-Time Economy) set out that any proposals for new night-time entertainment and related uses will only be permitted where there is no unacceptable impact on the amenity of residents or on environmental amenity, considering the potential for noise, disturbance, and odours from the operation of the premises, customers arriving and leaving the premises, and the servicing of the premises.

88. Local Plan (2015) Policies CS21 (Housing) and DM21.3 (Residential Environment) and Draft City Plan (2040) policies S3 and HS3 require the amenity of existing residents in identified residential areas to be protected.

89. Local Plan (2015) Policy DM15.7 and Draft City Plan (2040) Policy HL3 require noise pollution to be considered.

90. The site, located adjacent to a busy pedestrian walkway and the busy Thames waterway in The City, is a well-used public space, with iconic views of Tower Bridge. The site lies within the Central Activities Zone (CAZ) of London and therefore has an inherent busy character and a certain level of foot traffic and the noise that comes with it.

91. It must be noted the ground floor of Sugar Quay already benefits from a lawful use as a restaurant or a drinking establishment (including with

expanded food provision), although this commercial unit has not operated since completion.

92. This application is not for a new drinking establishment (including with expanded food provision), rather for an extension of the existing lawful commercial use, to provide outside space for customers upon the private area of the site (not impacting the area shaded red for public access on Image 1).

93. Residents and objectors are concerned about the potential disturbance due to noise pollution.

94. Concerns have been raised by residents and Environmental Health officers regarding the potential for noise disturbance. The jetty is located approximately 6 linear metres from residential balconies, and the proposed use would introduce a new, at times potentially continuous, source of outdoor noise in proximity to sensitive receptors during the proposed opening hours.

Noise Impact Assessments

95. A noise impact assessment has been submitted by the applicant (Quantum Acoustics, 11 November 2024). It states operational noise sources requiring consideration in this case include: Noise associated with customer comings and goings; Noise associated with customers dining; and noise associated with servicing activities.

96. The report identifies the closest sensitive receptors as the apartments on the upper levels of the Sugay Quay building, residents from which a majority of the written objections have been received.

97. The report sets out that these apartments are already exposed to relatively high environmental noise levels; they have been constructed with a high specification of soundproofing and mechanical cooling to mitigate against this; and that the surrounding Riverside area is vibrant and characterised noise results from the existing informal public use of the walkway and jetty.

98. Measurements were taken on three occasions in July 2024, revealing a vibrant atmosphere with significant pedestrian activity and various noise sources. Existing ambient noise levels were identified as being high between 17:00 and 22:00 (59--73 dB).

99. The highest noise levels measured were during the public use of the pier for an aerobic fitness session accompanied by amplified music.

100. The World Health Organisation's "Guidelines for Community Noise" provides the following guidance in relation to potential annoyance in external areas: "During the daytime, few people are seriously annoyed by activities with LAeq levels below 55dB; or moderately annoyed with LAeq levels below 50dB".

101. As the baseline levels are already above the WHO threshold, the report states the most appropriate metric to use to quantify the impact is the potential change in existing noise levels. It refers to the IEMA's *"*Guidelines for Environmental Noise Impact Assessment*"*.

Table 9.3: Proposed Assessment of Noise Change Significance

Impact Descriptor	Change in sound level	Effect
Major	Greater than 10dB L_{Aeq} change in sound level	Significant Adverse Effect
Moderate	A 5 to 9.9 dB L_{Aeq} change in sound level.	
Minor	A 3 to 4.9db L_{Aeq} change in sound level	Adverse Effect
Negligible	Less than 2.9dB L_{Aeq} change in sound level	
None	No change in sound level	No Adverse Effect

102. The report states that noise generated by customers is expected to be characterized by a "babble" of conversation, influenced by various factors such as number of customers, crowd density and vocal effort.

103. The report sets out a number of assumptions that have been used in the assessment to calculate the predicted increase in noise levels that would result from the proposed use of the jetty (see extracted table 9.4 below).

104. The report states that these results are a worst case scenario based on assumptions that: (a) all seats shown on the plan would be occupied throughout the opening hours; (b) the lowest ambient sound level measured during each period has been used; (c) the ground level commercial use is not operational, and therefore the noise levels do not include any potential use of this unit (which can lawfully be used as a restaurant or drinking establishment but has never operated); and (d) sound levels have been propagated to a worst case assessment location (other receptor locations will be further away from the proposed seating areas and will therefore experience lower noise levels).

Table 9.4: Assessment of Noise Change Significance

Time	Predicted Worst Seating Area Sound Level, $L_{Aeq,1hour}$	Worst Case Ambient Sound Level, $L_{Aeq,1hour}$	Resultant Sound Level, $L_{Aeq,1hour}$	Sound Level Change (dB)
17.00 –18.00	57	60	61.8	+1.8
18.00 –19.00	57	61	62.5	+1.5
19.00 –20.00	57	60	61.8	+1.8
20.00 – 21.00	57	60	61.8	+1.8
21.00 –22.00	57	59	61.1	+2.1

105. The largest predicted increase in noise level vs the baseline, of 2.1dB, would be between 9:00 PM and 10:00 PM. Thus the report recommends closure of the seating area at 9:00 PM in order to ensure residents are not unreasonably disturbed, and officers have recommended this be a condition of development, should permission be granted.

106. The predicted noise increases would be classified as negligible (less than 2.9) in the IEMA's guidance (table above). The report concludes that the noise associated with the use of the seating area would not give rise to any significant change in the magnitude of noise characterising the site, in the context of existing ambient noise levels and that a consideration of noise change is assessed to be of "marginal" significance only, and that the proposed use would be acceptable in the context of the relevant national and local planning policies and guidance.

107. The document suggests mitigating conditions, such as limiting the maximum number of external patrons, operational hours and an Operational / Noise Management plan.

108. Following publication of the application significant concern has been raised by neighbouring residents, including a group of objecting residents who have submitted an alternative noise impact assessment (RBA, 20 January 2025). This report provides a commentary on the Quantum Acoustics report, and sets out the results of their own baseline surveys, which were carried out in January 2025.

109. RBA's (the objectors') assessment uses different methodologies, and the differences are broadly summarised below.

Issue	QA Position	RBA Position	Officer Comment

Baseline noise	Higher (July, jetty edge)	Lower (January, balcony)	Seasonal and locational differences
Vocal effort	Normal to raised	Raised	QA tested both and conclude negligible impact
Reflection correction	Not applied	Applied (-3 dB)	Methodological differences
Predicted cumulative noise	Similar	Similar	Agreed between parties

110. The results of RBAs existing background surveys, and the predicted noise increases are set out in the table below. It is noted that the existing background noise levels observed by RBA in the surveys are considerably lower than the applicant's report and the predictive noise levels (resulting from proposal) are higher.

111. The results suggest increases of between 6.5dB and 10dB over the five hour period, which would be substantial and clearly noticeable to residents.

Time Period	Predicted Receive Level (dBA L_{eq})	Existing Background Noise Level (dBA L_{eq})	Cumulative Level dBA)	Noise Level Increase (dBA)	Noise Change Significance	Subjective Response
17:00 - 18:00	60	54.6	61.1	6.5	Substantial	Clearly Noticeable
18:00 - 19:00	60	53.5	60.9	7.4	Substantial	Clearly Noticeable
19:00 - 20:00	60	53.3	60.8	7.6	Substantial	Clearly Noticeable
20:00 - 21:00	60	52.4	60.7	8.3	Substantial	Clearly Noticeable
21:00 - 22:00	60	50.5	60.5	10.0	Very Substantial	Twice as Loud

112. The applicant has submitted a technical note (Quantum Acoustics, 25 April 2025) in response to the RBA report, and other consultation comments received. This seeks to provide responses to the matters set out in these representation, in particular technical matters of differing professional opinion noted within the RBA Noise Assessment. This is a long and technical document, which directly responds to each of the points made by RBA in their January Noise Impact Assessment.

113. RBA have subsequently followed up with an Acoustic Technical Note (RBA, 22 May 2025) in response. This summarises the key areas of disagreement between the RBA and Quantum Acoustics as they see them.

114. There is professional disagreement between the applicant's acoustic consultant, and the consultant employed by a group of objectors.

115. Essentially, RBA have recorded lower background noise levels compared to the applicant (Quantum Acoustics), and this could be accounted for by methodology.

116. Officers have no reason to dispute the results of either noise assessment that has been submitted, and do not rely on either, nor give additional weight to one over the other in our assessment.

Officer Assessment

117. Officers acknowledge that the proposal would result in a perceptible change in the acoustic environment, particularly affecting residents' use of balconies and open windows during warmer months. While the residential units were designed with high acoustic performance, this does not eliminate the potential for disturbance from outdoor activity.

118. Environmental health officers have been consulted, and have raised concerns with respect to potential noise and disturbance resulting from customers using the seating area and operational activities such as set up and shutting down, which could cause noise from trolleys transporting crockery and bottles etc. as well as the service throughout the opening hours.

119. They have advised that no noise-generating activity should occur outside of the proposed customer operating hours (9am-9pm), and that robust management measures will be required to prevent disturbance.

120. In response, the applicant has submitted a draft Operational Management Plan (OMP), which outlines procedures to minimise noise and disruption. These include:

- Restricting customer opening hours to 09:00-21:00, with all guests vacated by 21:00.
- Ensuring set-up and close-down activities are managed quietly, including use of rubber-coated chains and enclosed trolleys.
- Bulk transfer of glassware and waste to internal stores after 21:00 to avoid noise from bottle sorting on the jetty.
- Constant staff presence and additional security Thursday-Sunday.

- Community liaison and signage to manage guest behaviour.

121. While these measures are welcomed, Environmental Health officers remain concerned about the feasibility of silent close-down and the cumulative impact of daily outdoor use unless suitable planning conditions are secured. Officers consider that the draft OMP provides a reasonable framework, but its effectiveness will depend on strict adherence and ongoing review. This is recommended to be secured by condition.

122. The City licensing team has been consulted and have raised no in-principle concerns, and the Licensing Department are able to periodically review licences.

123. While the site is located in a busy, high-activity area within the Central Activities Zone, and the residential units were designed with high acoustic performance, this does not negate the fact that the proposal would result in a degree of impact to residential amenity.

124. However, officers consider that this impact would not be unacceptable when weighed against the wider planning benefits of the scheme, including activation of a long-vacant commercial unit, enhancement of the public realm, and alignment with strategic policy objectives including enhancing the riverside area, support for the evening and night-time economy and Destination City.

125. To mitigate the impacts, officers recommend a suite of conditions, including: A 9pm closing time and 9.30pm end to close-down activities, seated-only service, with maximum capacity of 157 customers, No music or promoted events, A detailed Operational and Noise Management Plan (OMP), to be approved prior to use and subject to review, and restrictions on servicing and trolley use. These measures are considered necessary and proportionate to ensure that the impact remains within acceptable bounds.

126. While the proposal would result in some impact to residential amenity, officers consider that this impact would not be unacceptable when weighed against the wider planning benefits. Subject to the imposition of robust conditions, the proposal is considered to comply with relevant policies, including CS20, DM15.7, DM21.3 of the Local Plan and HL3, S3 and HS3 of the Draft City Plan 2040.

Transport, delivery and servicing

Policy

127. NPPF Paragraphs 109-118 relate to promoting sustainable transport. Paragraph 113 states that Development should only be refused on highways grounds if: There would be an **unacceptable impact on highway safety**; or the **residual cumulative impacts on the road network would be severe**, taking into account all tested reasonable future scenarios and mitigation.

128. Strategic Policy CS16 of the Local Plan 2015 is relevant to transportation, it promotes improvements to the public transport capacity and the conditions of walking and cycling, Policy DM16.1 requires assessment to be submitted with applications for developments likely to have an effect on transport, Policy DM16.2 is relevant to pedestrian movements, Policy DM16.3 is relevant to cycle parking, Policy DM16.4 encourages active travel and Policy DM16.5 is relevant to parking and servicing standards.

Public Transport

129. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6b which is the highest score.

Trip Generation, pedestrian flows and safety

130. The submitted 'Highways and Transport Technical Note' (Odyssey, November 2024) includes a section on pedestrian surveys. An initial survey was conducted on the 16th of March 2024 of two-way flow at two points along Sugar Quay Walk, followed by an additional survey in July 2024 carried out at four additional points. The results of the surveys and findings of the report follow.

131. The Pedestrian Comfort Levels (PCL) are used to assess the level of crowding on a public highway.

132. The TfL's guidance sets out PCL's suitability for different area types in the peak hour and Average Maximum Activity (AMA) levels. For tourist attraction the peak and AMA is considered comfortable for levels A and B+; Acceptable for B; At Risk for B- ; Unacceptable/ Uncomfortable for levels starting from C+ to E. For level C+ and below proposals are considered unacceptable, requiring changes to allow widening of the areas where the pedestrian movements are taking place. It is noted that in this case there is no scope for widening the footway of Sugar Quay Walk.

133. The emerging City Plan 2040 states Transport Assessments submitted in support of planning applications should assess the level of pedestrian comfort and should provide a clear justification if any pavements in the vicinity of the development would fail to achieve a B+ rating.

134. The transport assessment (including addendum, April 2025) states that the proposed development would result in 174 server trips per hour across Sugar Quay Walk (348 two way), expected to be split evenly across any hour.

135. This level of trips equates to 3 waiter trips across Sugar Quay Walk for every minute, of which one trip every six minutes would be a staff member pushing a large trolley with dishes/ cutlery, and 1 customer trip every 13 seconds or 4-5 customers per minute. The total trips resulting from this proposal is 8 trips per minute.

136. The submitted PCL assessment concludes that Sugar Quay Walk would not be subject to significant congestion as a result of the development proposals, with a suitable amount of free space remaining for pedestrians to travel past the site without impacting on their speed and comfort level. The minimum PCL achieved would be B+, which is considered to be acceptable.

Safety

137. NPPF Paragraph 113 states development should be refused if there would be an unacceptable impact on highway safety.

138. In terms of safety, officers consider the size and type of trolley to be used by servers to transport food, drinks, and crockery etc. should be controlled to ensure pedestrian safety along Sugar Quay Walk. The transport officer has recommended a condition requiring details of this to be submitted and approved in writing by officers. The applicant has stated that the trolley has not yet been specified, however the specified system should: Be waist height or below to ensure that the server pushing the trolley is able to maintain clear visibility along the route; Have large rubber wheels to ensure that noise from the trolley is minimised along the route, and the wheels should have a brake function for when the trolley is stationary and when the trolley is using the ramp.

139. A visibility splay drawing has been submitted, which shows the achievable visibility for pedestrians exiting the building and crossing Sugar Quay Walk would be 40m to the west and 58m to the east. In addition, considering that pedestrians generally walk at 1.2m/ second

(UK Data Service), a visibility splay of 40m would provide crossing pedestrians 33 seconds to find a gap, and adjust their course from the farthest away pedestrian. Given that the width of Sugar Quay Walk is only 3m, or a journey of circa. four seconds, this level of inter-visibility and time is considered sufficient to avoid conflicts with restaurant servers.

140. Furthermore, the operational management plan condition would require details of staff training with respect to ensuring pedestrian safety when crossing the walkway. It is noted that any new gates would be required to open inwards to the private area, and not outwards to the public area.

141. In light of the above, and subject to compliance with the recommended conditions, officers consider there would not be an unacceptable impact on safety of pedestrians.

Servicing

142. Under the current City's Transport Strategy and its proposals and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's transport infrastructure will be maintained and improved, by minimising road danger, congestion, and reducing vehicle emissions. Deliveries, servicing, including refuse and recycling vehicle trips, should be made outside of peak hours: 7:00 - 10:00, 12:00 - 14:00 and 16:00 - 19:00. For proposals near residential areas, further restrictions do apply, on evenings and early morning hours.

143. There is a loading area for the building accessed from Lower Thames Street which would be used by the commercial unit. This is confirmed in the approved servicing management plan under 14/01006/FULMAJ. This servicing management plan remains in place for the commercial unit, including its proposed use of the jetty. It is considered the existing loading bay is suitable, and therefore no additional servicing management plan condition is required.

144. Servicing is currently not allowed between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays as a condition of 14/01006/FULMAJ.

Disabled Motor Vehicle Parking

145. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with appropriate levels of parking. Appropriate disabled persons parking for Blue Badge holders should be provided as set out in the Policy T6.5 for Non-residential elements of the development. The levels of provisions are set out in Table 10.6, to ensure that all non-residential parts of a development should provide access to at least one, on or off-street disabled persons parking bay.

146. Policy DM 16.5 of the Local Plan requires designated Blue Badge holders parking must be provided within developments in conformity with London Plan.

147. The emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's transport infrastructure will be maintained and improved, by minimising road danger and congestion, and reducing vehicle emissions by: a) Not providing any additional on-street car and motorcycle parking; b) Identifying opportunities to use on-street parking restrictions to discourage private vehicle use; c) Designing and managing streets in accordance with the City of London street hierarchy.

148. There is no requirement for additional disabled car parking in this case, as the proposal is ancillary to the existing development with a planning permission.

149. Nevertheless, on-street disabled car parking bays nearby can be used by occupiers and visitors of this development, with restrictions for Red and Blue Badge Holders limited to a maximum stay of 4 hours, Mondays to Fridays inclusive.

150. Providing an allocated space on-site has not been possible for disabled motor vehicle parking. It is acknowledged that local disabled bay parking is available on the local highway as mentioned in the submitted Transport Assessment. The nearest disabled parking bay is located less than 50 metres from the site entrance which is limited to a maximum stay of 4 Hours on Mondays to Fridays inclusive, with no restricted hours of weekends.

151. Due to the proximity of the nearest disabled parking bay it is considered that adequate provision is in place to allow access for disabled motor vehicles users.

Cycle Parking

152. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

153. The London Plan, Policy T5 Cycling indicates that development proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle

154. Policy DM 16.3 of the Local Plan, requires applicants to provide on-site cycle parking spaces in accordance with the London Plan standards and exceed the standards when feasible.

155. This proposal does not include additional cycle parking, nor other facilities associated with cycling, because the existing cycle parking facilities at Sugar Quay are expected to be used. The applicant is advised to promote the cycle parking for visitors and employees of the restaurant.

156. The transport officer has confirmed this to be acceptable.

Management of Construction Impacts on the Public Highway in the local area

157. The London Plan, Policy T7 on deliveries, servicing and construction, indicates that developments must address their impacts during the construction phase and following the occupation after the site is operational.

158. Policy D16.1 of the Local Plan supporting paragraph 3.16.11 and the emerging City Plan 2040 Policy VT1 state that Construction Logistics Plans (CLP) will be required for all major developments, or refurbishments and for any developments that would have a significant impact on the transport network during construction.

159. Very limited construction activities are expected to take place, since only the borders, benches and landscaping are proposed be installed. The transport officer has therefore confirmed there is no requirement for a condition requiring a construction management plan to be submitted.

Transport Impact Conclusions

160. The proposals are acceptable in transport terms, subject to compliance with the recommended conditions.

Ecology

Policy

161. London Plan Policy G6 (Biodiversity and Access to Nature) requires development proposals to:
- Avoid significant harm to biodiversity.
- Follow the mitigation hierarchy (avoid, mitigate, compensate).
- Secure net biodiversity gain where possible.
- Protect and enhance Sites of Importance for Nature Conservation (SINCs), including SMINCs.

162. The City Plan 2040 reinforces this through:
- Strategic Policy S17 (Thames Policy Area), which promotes biodiversity enhancement along the riverside.
- Policy HL3 (Noise and Light Pollution), which seeks to minimise disturbance to wildlife from artificial lighting and operational noise.
- Policy DE3 (Public Realm), which encourages greening and ecological enhancement in public spaces.

163. The application site lies above the River Thames, which is designated as a Site of Metropolitan Importance for Nature Conservation (MSINC). These sites represent London's most valuable ecological assets and are afforded a high level of protection in the planning system. While the Sugar Quay jetty is a man-made structure and not part of the riverbed or natural habitat, its location above the Thames means that ecological considerations remain relevant.

Officer assessment

164. The proposed use of the jetty for outdoor seating does not involve physical development of the riverbed or permanent structures. The jetty is already hard-surfaced and in active use. The proposal includes planters and soft landscaping, which would contribute positively to biodiversity and urban greening. No works are proposed that would directly affect the aquatic habitat or interfere with the river's ecological function.

165. The appeals were considered at Public Inquiry between the 25 January and 17 January 2022 under appeal references

APP/K5030/W/21/3281630 and APP/K5030/Y/21/3281258. Both appeals were dismissed by the Planning Inspector in the appeal decision dated 30 June 2022.

166. It is noted that the application descriptions as set out above were amended through the appeal process and that the Georgian Group were a Rule 6(6) Party during the appeal.

167. Nonetheless, the applicant has submitted a Preliminary Ecological Appraisal (PEAR - Greengage, April 2024) and Biodiversity Net Gain (BNG) Assessment (Greengage, April 2024).

168. The PEAR concludes no evidence of protected species (e.g. bats, water vole, otter, reptiles) was found on the jetty, and the site is considered to have low ecological potential. It recommends the development incorporate biodiversity enhancements such as: Pollinator-friendly planting; SuDS-compatible planters; Nesting boxes or habitat features where feasible; Implementation of lighting controls to minimise disturbance to nocturnal species, and to ensure any works comply with relevant wildlife legislation (e.g. Wildlife and Countryside Act 1981).

169. The BNG Assessment calculated the baseline habitat value of the site as 0.00 habitat units, due to its classification as “other developed land” with no ecological function. Due to this, the site does not trigger a mandatory BNG requirement under the Environment Act 2021, which applies to developments that result in habitat loss or degradation.

170. Although the site does not trigger a statutory requirement for Biodiversity Net Gain due to its zero baseline habitat value, the applicant has voluntarily submitted a BNG assessment.

171. The BNG assessment calculates the proposed enhancements would result in a net gain of 0.03 habitat units, primarily through the introduction of SuDS-compatible planters and pollinator-friendly planting.

172. The adjacent watercourse was assessed but not directly impacted by the proposal, and no riparian or aquatic habitat encroachment was identified in the PEAR.

173. The design and access statement outlines several landscape and ecological enhancements including:

- Planting and Soft Landscaping: Integrated planters with an emphasis on pollinator-friendly, wind tolerant species and climate-resilient planting.

- SuDS-Compatible Rain Garden Planters, designed to collect rainwater from downpipes, incorporate soil/compost mix for water retention and plant support, excess water filtered through geotextile membranes and released at a controlled rate.

174. These measures are considered beneficial and align with strategic policy objectives for urban greening and biodiversity enhancement.

175. A condition is recommended to be imposed requiring a planting and maintenance schedule, to ensure ecological benefits are sustained. Lighting must be designed to minimise spill into the river and avoid disruption to nocturnal species, in line with Policy HL3, and details of this are recommended to be secured by condition.

176. Subject to these measures, the proposal is considered to be compatible with the MSINC designation and is compliant with London Plan Policy G6 and policies OS3 and OS4 of the City Plan 2040.

Planning Obligations and Community Infrastructure Levy

177. The development constitutes a change of use and does not propose an uplift in floor area greater than 100sqm. As a result, the development would not be liable for CIL and would not require a legal agreement under Section 106 of the Town and Country Planning Act 1990.

178. No legal agreement is required for this planning application.

Public Sector Equalities Duty

179. When considering the proposed development, the Public Sector Equality Duty requires the City of London Corporation to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

180. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-

- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;

- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

181. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

182. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

183. This application has been assessed against the Equality Act 2010 and any equality impacts identified. It is the view of officers that a decision to grant planning permission, subject to the recommended conditions, would not disadvantage those who are protected under the Equality Act 2010.

184. In this case the proposal would reduce barriers to access for disabled people through the provision of a range of seating options for different users within the public realm and private seating area. Officers consider that this would advance equality of opportunity.

185. In relation to policy GG1 of the London Plan, the proposals are considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Human Rights Act 1998

186. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR").

187. Officers have given consideration towards the interference with the right to respect for one's private and family life (Article 8 of the ECHR) or peaceful enjoyment of one's possessions (Article 1 of Protocol 1), including by causing harm to the amenity of those living in nearby

residential properties. Officers have assessed the level of harm that would result to residential amenity to be acceptable, and therefore do not consider the proposal would result in an infringement of the ECHR as a result of the proposal.

188. Therefore, it is the view of officers that there would be no infringement of Article 8 or Article 1 of Protocol 1 of the ECHR as a result of refusal of planning permission.

Conclusions

189. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance including SPDs and SPGs, the NPPF, the emerging Local Plan, the London Plan and considering all other material considerations.

190. The proposed use of the application site for seating and service, in connection with the existing drinking establishment (including with expanded food provision) use is considered acceptable. It would add to the vibrancy of this area and may help to bring a vacant commercial unit, in an attractive riverfront location into commercial usage. The proposal would provide local facilities for the City's workforce and tourists, enhance vibrancy of the riverside area and support the aims of Destination City.

191. In order to address concerns raised in respect of potential impacts on the amenity of surrounding residents as well as the area generally, conditions are recommended including a closing time no later than 9pm, seated table service of customers only, and details of an operational and noise management strategies to be secured by conditions.

192. Having assessed the impact of the proposal and recognising the weight to be given to any potential harm, it is considered that the proposals would achieve a use which would be compatible with the local area, and contribute positively to the vibrancy and activity of this part of the riverside. Subject to the recommended conditions the proposed use of the jetty in connection with the drinking establishment (including with expanded food provision) would result in acceptable impacts to the amenity of residents and the surrounding area.

193. It is therefore recommended that planning permission is granted for the proposed use and the associated landscaping works.

Background Papers:

- Outline Operational Management Plan (Daniel Watney, 28 July 2025)
- Design and Access Statement Addendum 2 (Sketch, May 2025)
- Highways and Transport Technical Note Addendum (Odyssey, April 2025)
- Noise Impact Assessment Technical Note (Quantum Acoustics, 25 April 2025)
- Applicant Response to Public Comments (Daniel Watney, 22 April 2025)
- Flood Risk Assessment Addendum 1 (Odyssey, January 2025)
- BNG Assessment (Greengage, April 2024)
- Preliminary Ecological Appraisal (Greengage, April 2024)
- Flood Risk Assessment (Odyssey, April 2024)
- Noise Impact Assessment (Quantum Acoustics, 11 November 2024)
- Design and Access Statement (Sketch, May 2024)
- Highways and Transport Technical Note (Odyssy, November 2024)

Submitted Plans / Drawings

Received 9 May 2025

- A(GA)-100 Rev.PL2 Existing Ground Floor Plan
- A(GA)-100 Rev.PL3 Proposed Jetty Plan

Received 13 November 2024

- A(94)-700 Rev.PL1 Proposed Design Planters
- A(GA)-400 Rev.PL1 Proposed South Elevation
- A(GA)-401 Rev.PL1 Proposed East Elevation
- A(SRV)-400 Rev.PL1 Existing South Elevation
- A(SRV)-401 Rev.PL1 Existing East Elevation
- A(OS)-001 Rev.PL1 Location Plan

APPENDIX A: Representations

Representations / Consultation Responses:

Memo - Lead Local Flood Authority dated 12 May 2025
Memo - Lead Local Flood Authority dated 19 December 2024

Memo - Environmental Health Officer dated 26 March 2025

Email - Food Team Manager dated 21 March 2025

Email - Licensing Officer dated 13 March 2025

Letter - Environment Agency dated 23 December 2024

Email - Port of London Authority dated 20 December 2024

Email - Waste Division dated 13 December 2024

Objection Letter - Dadds LLP Solicitors, on behalf of sugar quay residents, dated 27 May 2025

Objection Letter - Dadds LLP Solicitors, on behalf of sugar quay residents, dated 18 January 2025

Noise Impact Assessment (RBA) dated 20 January 2025

Objection Letter: River Residents Group, dated 14 January 2025

Public Representations:

14/12/2024 - 08:38 Mr Gokhan Saygi

13/12/2024 - 08:49 Mr Iain Reitze

19/12/2024 - 01:12 Dr Prasanna Sundaralingham

20/12/2024 - 19:02 Mr James Li

22/12/2024 - 17:26 Miss Antonia Osgood

28/12/2024 - 09:29 Mr Alastair Macaulay

28/12/2024 - 23:10 Ms Fiona Hazell

30/12/2024 - 16:30 Patrick Goldrick

30/12/2024 - 21:28 Mrs Ting Qin

30/12/2024 - 21:39 Mrs Ting Qin

02/01/2025 - 14:06 Mr PAT GOLDRICK

02/01/2025 - 14:10 Mrs Ros Goldrick

02/01/2025 - 20:58 Miss Evie Watson

03/01/2025 - 09:05 Jon Goldrick

03/01/2025 - 11:44 Mrs Joanna Watson

03/01/2025 - 17:42 Miss Sophie Hill

03/01/2025 - 21:42 Mr Wayne Watson

03/01/2025 - 21:48 Mr Kyle Watson

04/01/2025 - 08:48 Stella Sutcliffe

06/01/2025 - 13:50 Mr Mikael Olsson

06/01/2025 - 14:19 Mrs Sonja Katarina Olsson

06/01/2025 - 15:21 Mr james Maguire

06/01/2025 - 20:51 Mr Scott Hayward

06/01/2025 - 21:15 Miss Sarah Bruton

06/01/2025 - 23:05 Mr Daniel Burke

07/01/2025 - 19:47 Mr Damian Finnegan

08/01/2025 - 11:44 Ms Troo Heath-Crew

08/01/2025 - 14:55 Mr Gokhan Saygi

08/01/2025 - 18:40 Mr Peter Egner

10/01/2025 - 17:04 Miss liana zhao

11/01/2025 - 08:02 Mr Julian Keller

11/01/2025 - 12:20 Mr Iain Reitze

11/01/2025 - 12:37 Jackie Alexander

11/01/2025 - 13:08 Miss Jeanette Growney

11/01/2025 - 13:14 Lord Jeff Williams

11/01/2025 - 13:15 Mrs Julie Williams

11/01/2025 - 13:21 Mr Jason Robins

11/01/2025 - 14:11 Mrs Susan Catterall

11/01/2025 - 15:31 Mr John Catterall

11/01/2025 - 20:21 Danielle Pointing

14/01/2025 - 12:25 River Residents Group

21/01/2025 - 16:49 Dadds LLP

22/01/2025 - ??:?? Mr Francisco Baeza

31/01/2025 - 14:03 Mr Paul Snow

31/01/2025 - 14:31 Mr David Linnell

19/02/2025 - 21:22 Mrs Alicia Williams

10/03/2025 - 19:28 Mr Roger Mchardy

14/03/2025 - 15:32 Miss Victoria Jenkins

14/03/2025 - 15:32 Miss Victoria Jenkins

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

APPENDIX B: Relevant Policies

Relevant London Plan Policies

Policy GG1 (Building strong and inclusive communities) encourages early and inclusive engagement with stakeholders, including local communities, in the development of proposals, seeking to ensure positive changes to the physical environment and provide access to good quality community spaces, services, amenities and infrastructure. In addition, it supports London continuing to generate a wide range of economic and other opportunities promoting fairness, inclusivity and equality.

Policy SD4 The Central Activities Zone (CAZ)

Policy D4 states that "design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan."

Policy D11 Safety, security and resilience to emergency

Policy D13 (Agent of Change) places the responsibility of mitigating noise impacts upon the proposed new development.

Policy D14 (Noise) seeks to avoid significant adverse noise impacts on health and quality of life, and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.

Policy HC1 (Heritage conservation and growth) requires development proposals "should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings."

Policy HC6 Supporting the night-time economy seeks to promote the night-time economy, where appropriate, particularly in the Central Activities Zone; to diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums; to address the cumulative impact of high concentrations of licensed premises on anti-social behaviour, noise pollution, health and wellbeing and other issues for residents and nearby uses, and seek ways to diversify and manage these areas; and to protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues.

Policy G4 Open space

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Relevant GLA Supplementary Planning Guidance (SPGs)

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- Cultural Strategy (2018);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)
- Planning for Sustainability November 2023
- Lighting SPD, October 2023

Relevant Local Plan Policies

CS3 Security and Safety

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;

b) measures to be integrated with those of adjacent buildings and the public realm;

c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:
a) conducting a full risk assessment;
b) keeping access points to the development to a minimum;
c) ensuring that public realm and pedestrian permeability associated with a building
or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
d) ensuring early consultation with the City of London Police on risk mitigation measures;
e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.5 Night-time entertainment

1) 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 no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;
b) 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.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

CS9 Thames and Riverside

To ensure that the City capitalises on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding, by:

1. Designating the Thames Policy Area and preparing and keeping under review an area appraisal which identifies the attributes of the area and gives guidance on development within this area.

2. Ensuring that buildings and spaces on or near the riverside contribute to sustainable economic growth and further the aims of the Riverside Walk

Enhancement Strategy, particularly through:

(i) protecting public access and river views along the riverside walk and securing completion of the riverside walk at Queenhithe;

(ii) improving access to the river and riverside walk from the rest of the City and the Thames bridges;

(iii) improving the vibrancy of the riverside by encouraging a mix of appropriate commercial uses and promoting office-led commercial development, whilst preserving privacy, security and amenity for residents, businesses and other stakeholders;

(iv) improving opportunities for biodiversity, in line with the City of London Habitat Action Plan for the Thames foreshore.

3. Supporting and safeguarding sites for the construction of the Thames Tideway Tunnel, including connection of the Fleet combined sewer outflow, resulting in reduced storm water discharges into the River Thames and improved water quality.

4. Promoting the functional uses of the River Thames and its environs for transport, navigation and recreation, particularly through:

(i) retaining Walbrook Wharf for waterborne freight traffic;

(ii) encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;

(iii) retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;

(iv) maintaining London Bridge, Tower Bridge, Blackfriars Bridge, Southwark Bridge and the Millennium Bridge;

(v) refusing development on or over the River, except for structures which specifically require a waterside location for river-related uses;

(vi) resisting the permanent mooring of vessels; if moored vessels are exceptionally permitted they must be of national importance, have a special connection with the City and the River Thames, be used for a river related purpose and not have a detrimental impact on navigation, river regime or environment;

(vii) maintaining access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

a) the predominant use of the space, surrounding buildings and adjacent spaces;
b) connections between spaces and the provision of pleasant walking routes;
c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
j) the use of high quality street furniture to enhance and delineate the public realm;
k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;

c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

CS11 Visitor, arts and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

DM11.1 Protection of Visitor, Arts and Cultural facilities

1) To resist the loss of existing visitor, arts and cultural facilities unless:

a) replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
b) they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
c) it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

2) Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

CS15 Creation of sustainable development

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect

neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

CS16 Public transport, streets and walkways

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

a) road dangers;
b) pedestrian environment and movement;
c) cycling infrastructure provision;
d) public transport;
e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.8 River Transport

1. River piers, steps and stairs to the foreshore, the Walbrook Wharf safeguarded site, and other river-based transport infrastructure will be safeguarded and improvements will be supported.

2. Development adjacent to or over the River Thames must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential for the use of the river for the movement of construction materials and waste.

CS18 Flood risk

To ensure that the City remains at low risk from all types of flooding.

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;

b) the benefits of the development outweigh the flood risk to future occupants;

c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and

b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

CS19 Open Spaces and Recreation

To encourage 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.

DM19.2 Biodiversity and Urban Greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- *green roofs and walls, soft landscaping and trees;*
- *features for wildlife, such as nesting boxes and beehives;*
- *a planting mix which encourages biodiversity;*
- *planting which will be resilient to a range of climate conditions;*
- *maintenance of habitats within Sites of Importance for Nature Conservation.*

CS20 Improve retail facilities

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

DM20.3 Retail uses Elsewhere in the City

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

CS21 Housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, to meet

the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

Relevant Emerging City Plan 2040 Policies

S1: Healthy and inclusive City

HL1 Inclusive buildings and spaces

HL3 Noise

S2 Safe and secure City

SA3: Designing in Security

HS3 Residential Environments

SA3: Designing in security

S5: Retail and active frontages

RE2: Active frontages

S6 Culture and Visitors

CV1: Protection of Existing Visitor, Arts and Cultural Facilities

CV2: Provision of Arts Culture and Leisure Facilities

CV3: Provision of visitor facilities

CV5 Evening and Night time economy

S2: Design

DE1: Sustainable design

DE2: Design Quality

DE8: Lighting

S9 Transport and servicing

VT1: The impacts of development on transport

VT4: River Transport

S10: Active Travel and Healthy Streets

AT1: Pedestrian movement, permeability and wayfinding

S11: Historic environment

HE3: Setting of the Tower of London World Heritage Site

S14: Open Spaces and Green Infrastructure

OS1: Protection and provision of open spaces

OS2: Urban Greening

OS3: Biodiversity

S15: Climate Resilience and Flood Risk

CR2: Flood Risk

S17: Thames Policy Area

S19: Pool of London

APPENDIX C: Committee Report for 14/01006/FULMAJ dated 23 February 2016

APPENDIX D: Public Minutes from P&T Committee meeting 23 February 2016

APPENDIX E: S106 Deed of Variation related to 14/01006/FULMAJ, dated 11 May 2016

SCHEDULE 1

APPLICATION: **24/01196/FULL**

Sugar Quay

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.

CONDITIONS

1.	Time Limit The development hereby permitted shall be begun before the expiration of three years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
2.	Materials details Before any works thereby affected are begun, details and samples of all materials, including the powder-coated metal planters and timber-slat benches, shall be submitted to and approved in writing by the Local Planning Authority. The details shall include finishes, colours, and measures to ensure maintenance. REASON: To ensure that the Local Planning Authority may be satisfied with the materials' durability, suitability, and integration with the jetty's setting, in accordance with policy DM10.4 of the Local Plan.
3.	Detailed Planting Schedule Prior to the commencement of relevant works, a detailed planting schedule should be provided covering: i) Names of plants (English and/or Latin Names) ii) Number of plants iii) Maintenance of plants REASON: To enhance biodiversity, ensure climate resilience, and ensure accessibility, in accordance with policies DM19.1 and DM19.2 of the Local Plan.
4.	Inclusive Access Management Plan Prior to commencement of any relevant works, an inclusive access management plan shall be submitted to the Local Planning Authority which shall provide specific details on how the development will be

	operated and managed to ensure that the highest reasonable standard of inclusive accessibility is provided. This management plan shall include details of access for customers with specific access requirements including neurodivergence, and details of accessible toilet facilities. It should contain detailed layout plans of the seating area, including seating spaces for a wide range of customers with different access requirements, passing places and turning circles. The agreed scheme shall be implemented before the commencement of the use hereby permitted and retained as such for the lifetime of the development. REASON: To ensure reasonable adjustments are carried out in pursuit of an accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.
5.	Inclusive and accessible public seating details Details of inclusive accessibility features for the public seating, including armrests for support, shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development. REASON: To ensure inclusivity and accessibility for all users, in accordance with policies DM10.8 of the Local Plan.
6.	Lighting Strategy Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing lighting, and how this has been designed to reduce glare and light trespass, including to the River Thames. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development, to ensure a satisfactory external appearance and to protect nocturnal wildlife, in accordance with the following policies of the Local Plan: DM10.1, DM15.7, DM19.2 and policy DE2 and OS3 of the Emerging City Plan 2040.
7.	Operational and Noise Management Strategy Details of an operational Management Strategy demonstrating how the amenity of nearby residents would be protected during the operations on the jetty shall be submitted to and approved in writing

	by the Local Planning Authority prior to the first commencement of the use of the jetty hereby permitted. The Strategy should detail: 1. How the operator proposes to discourage noise, disturbance and anti-social behaviour during the opening hours of the Jetty; 2. A scheme relating to the efficient and quiet dispersal of patrons leaving seating area after 21:00; 3. Details of signage reminding customers to be respectful of neighbours; 4. Details of staff training to discourage noisy behaviour from customers and set-up and close-down operations, and to ensure the Riverside Walk is not obstructed by the commercial operations. 5. Details and specification of the proposed trolleys to be used to transport items from the main restaurant area to the jetty, including dimensions and type of wheels to be used to minimise noise. 6. Details of the proposed storage of food and drinks in the storage/bar area on the jetty. 7. Details of set-up and close down, including storage of tables, chairs and any other movable (non-fixed) items. To include details of timings, and how it will be ensured noise producing activities are minimised outside of the customer opening hours. 8. Details of how the area will be secured against passersby when closed. 9. Details of cleansing regime, including staff training to ensure noise is minimised. 10. Details of a neighbour liaison as a resident contact; 11. Details of recording incidents and complaints and a policy for investigation of such complains; 12. The circumstances and time periods, which trigger the need for a review of the visitor management plan. The commercial area of the jetty searing area shall thereafter be operated at all times in accordance with the approved Management Statement (or any amended Management Statement that may be approved by the Local Planning Authority) for the life of the use. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM3.5, DM15.7, DM21.3.
8.	<u>Plant Noise</u> (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the

	design requirements shall be submitted to and approved in writing by the Local Planning Authority. (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority. REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
9.	Mechanical Plant Mounting Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
10	Use only in connection with Sugar Quay Commercial unit The use of the jetty hereby approved must only be in connection with the operation of the ground floor commercial unit at Sugar Quay, and must not operate as a standalone commercial entity. 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.
11	Seated Customers Only The use of the jetty hereby approved must only be as a seated venue with table service only. The bar area must only be used by waiter-service for seated guests on the jetty. 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.
12	Maximum capacity The maximum capacity of the jetty shall not exceed that indicated on plan no. A(GA)-100 Rev.PL3 - *Proposed Jetty Plan* - hereby approved (157 seated customers), unless otherwise confirmed in writing by the local planning authority. 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.

13	Jetty Opening Hours The commercial use of the Jetty area hereby permitted shall not be open to customers between the hours of (21:00) on one day and (09:00) on the following day. There shall be no set-up or close-down activity or operations on the Jetty other than between (08:30) and (21:30). 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.
14	No Music No live or recorded music shall be played by on the Jetty as part of the use hereby approved. 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.
15	No Promoted Events There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided by a disc jockey or disc jockeys, one or some of whom are not employees of the premises licence holder and the event is promoted to the general public. 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.
16	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: A(GA)-100 Rev.PL3 Proposed Jetty Plan A(94)-700 Rev.PL1 Proposed Design Planters A(GA)-400 Rev.PL1 Proposed South Elevation A(GA)-401 Rev.PL1 Proposed East Elevation 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.

INFORMATIVES

1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

2 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.

3 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged. Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

4 The Port of London Authority advise that the developer continues to investigate the potential to use the jetty for river related activities as part of the development.

5 The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sqm

Retail £165 sqm

Hotel £140 sqm

All other uses £80 per sqm

These rates are applied to "chargeable development" over 100sqm (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sqm for offices, £150 per sqm for Riverside Residential, £95 per sqm for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: https://www.planningportal.co.uk/planning/policy-and-legislation/CIL/download-the-forms)

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

This page is intentionally left blank

Committee:	**Date:**
Planning and Transportation	23 February 2016
Subject: Sugar Quay, Lower Thames Street, London EC3R 6EA Public use of the Sugar Quay jetty. Related to an application under Section 73 to make minor material amendments to planning permission dated 16th September 2013 (12/01104/FULMAJ) including lowering of the first floor soffit level and repositioning of the two north cores, rationalisation of restaurant deliveries and refuse collection, facade and landscaping improvements, changes to the internal configuration of residential units and associated works.	**Public**
Ward: Billingsgate	**For Decision**
Registered No: 14/01006/FULMAJ	**Registered on:** 9 December 2014

Summary

On 12 January 2016 your Committee considered a proposal to make minor material amendments to planning permission for redevelopment of Sugar Quay including lowering of the first floor soffit level.

You agreed to grant planning permission subject to public access being provided to the Sugar Quay Jetty, the access and hours to be included in a deed of variation to the Section 106 agreement. You instructed that consideration of the S106 agreement be brought back to the Committee for approval.

The information supplied by the applicant demonstrates that the jetty is safe for public use and that it will be maintained to satisfy the terms of the PLA licence.

The applicant has agreed to 24 hours public access subject to a review after an initial period and there will be appropriate structures, barriers and lighting on the jetty.

Public access to the jetty would be for the life of the building, subject to the jetty remaining in situ. Whilst this cannot be guaranteed, the jetty would only be removed if required by the PLA for navigational or river regime reasons.

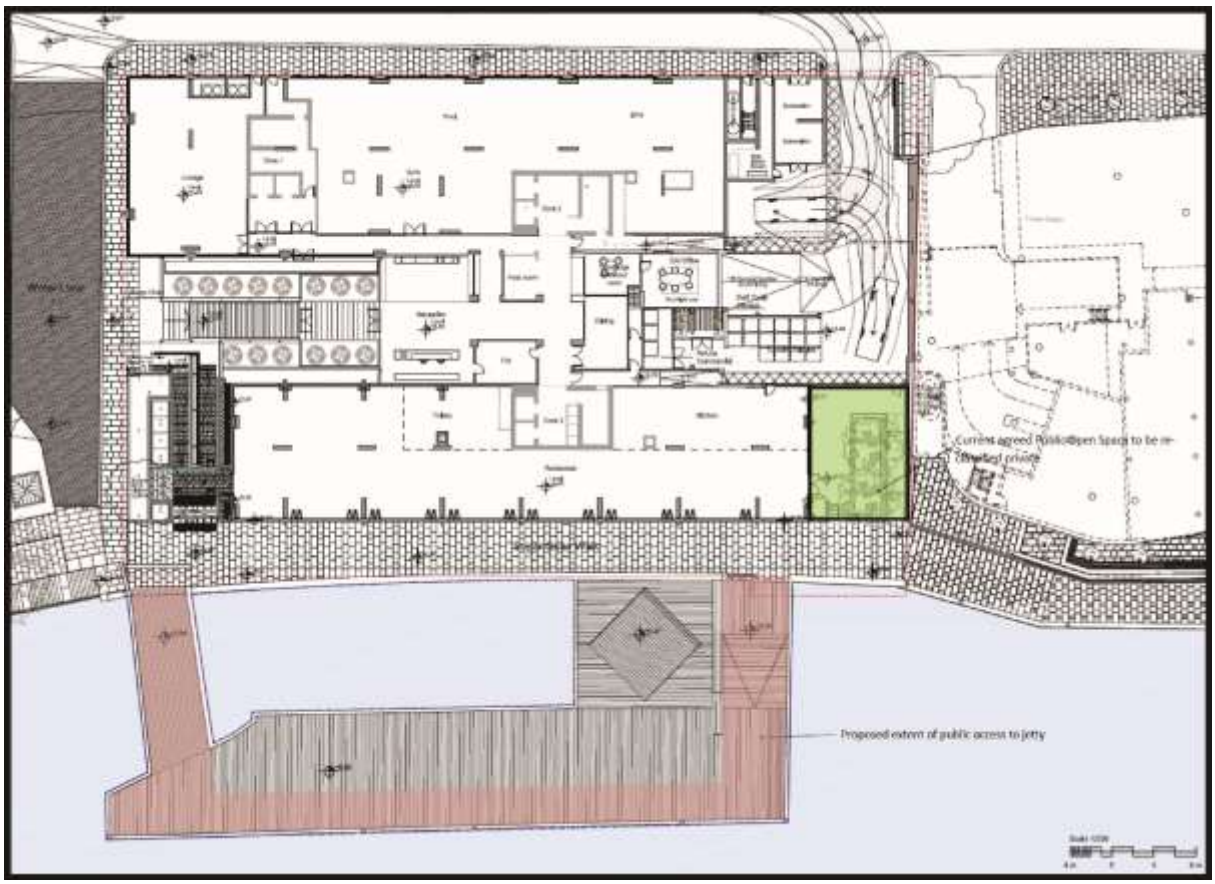
The information provided demonstrates that Section 106 agreement would make provision for adequate public access.

Recommendation

Members are asked to:

(a) Agree to enter into a deed of variation of the Section 106 agreement dated 16th September 2013 to provide 24 hour public access to the Sugar Quay jetty, the decision notice not to be issued until such obligations have been executed;

(b) Instruct your officers to negotiate and execute the deed of variation to the Section 106 agreement.



Main Report

Background

1. On 12 January 2016 your Committee considered the planning application 14/01006/FULMAJ.

2. You agreed to grant planning permission subject to public access being provided to the Sugar Quay Jetty, the access and hours to be included in a deed of variation to the Section 106 agreement. You instructed that consideration of the S106 agreement be brought back to the Committee for approval.

Current Position

3. The following issues were raised by Members on 12 January and have been considered by the applicant.

Hours of public access – Committee request for public access to be 24 hours a day

4. After considerable deliberation the applicant has agreed to 24 hour access. However, the applicant is very concerned about the prospect of the jetty being used throughout the night particularly in the early hours of the morning and suggests that the legal agreement makes provision for the 24 hour public access is reviewed after an initial period.

5. Your officers consider this is an appropriate measure as it will enable the hours to be reconsidered in the light of any antisocial behaviour or safety issues. In view of Members concern I suggest that any request for night-time closure be brought before your Committee.

The future use of the private area on the jetty

6. The applicant does not have any current proposals for the area excluded from the proposed public route on the jetty. Use of the “private” area is likely to require planning permission.

7. The applicant suggests that it might be helpful to identify the area shown on the plan as the minimum extent of public access. This would allow a greater area for public use if no other use is proposed for the “private” area.

Public access to the jetty for the life of the building

8. The river bed on which the jetty stands is mainly owned by the PLA; a very small area is owned by the Crown. The developer holds a licence from the PLA and Crown to keep the jetty in the river. This licence is subject to limitations and maintenance requirements.

9. Your officers have talked to the PLA about the possibility of the jetty remaining for the life of the proposed building. The PLA needs to retain the right to revoke the licence and require removal of the jetty but they point out that the grounds for doing so would be limited to navigation and river regime reasons connected with its statutory duties. Were the PLA to seek to revoke the licence then there is an appeals procedure to the Department of Trade.

10. The PLA advises that in practical terms revocation of a licence occurs very rarely. Two instances in last 10 years were cited. The first involved a jetty which had been badly damaged by fire and the second a mooring that was no longer capable of being used.

11. The risk of the jetty being removed appears to be low and I therefore recommend that the requirement in the legal agreement should be that public access for as long as the jetty and building both exist.

Structural condition and maintenance of the jetty

12. The jetty was substantially rebuilt about 11 years ago.

13. The applicant advises that Beckett Rankine, Marine Consulting Engineers, have undertaken an inspection of the jetty and they appointed Swantest to undertake load testing.

14. Swantest advised that the required loading was defined as 5kN/m2 which will allow for pedestrian access only loading on the jetty. Swantest's report concludes "following a series of load tests … the results show that there was no significant deflection or distress to the timber decking or the supporting structure. This shows that the jetty is fit for purpose and can safely support the test load of 5kN/m2."

15. The jetty was noted to be in generally good condition

16. The PLA licence for the jetty sets out maintenance requirements. Responsibility for maintenance of the jetty remains with the licence holder.

Structures, barriers and lighting

17. Photos will be displayed at the Committee meetings showing the existing decking, balustrades, lifesaving equipment and lighting on the jetty.

18. Beckett Rankine advise that steel handrails are intact and stable and follow requirements of ROSPA guidelines for band 4 which is the band required in order to deny access to the public because of the extreme danger (balustrading at least a metre high, curved railings to deter climbing etc).

19. There are four light fittings located at the front edge of the jetty in good condition and stable.

20. The legal agreement will include provisions for the developers to cleanse and maintain the jetty surfaces, provide and maintain lighting and provide any barriers/railings, seating and planters.

Flood risk

21. The jetty is currently at the same level as the Riverside Walk, which is circa 5.3m AOD. The statutory flood defence level is 5.28m AOD which is below the level of the jetty. The Thames Estuary 2100 Plan proposes raising this to 6.35m AOD. The site at Sugar Quay was assessed for flooding in the future and a flood defence plan was submitted as part of the planning application.

22. Access to the jetty is from the Riverside Walk. If flooding were to occur the Riverside Walk would be affected and the jetty would be inaccessible.

23. The legal agreement will include a requirement for the management team of the development to be responsible for closing the jetty in the event of a predicted flood risk. The Environment Agency releases regular information on potential flood events and this will be checked by the management team. If a warning is given for the Thames then the management company will lock the jetty and access will be prohibited until the risk has reduced and the flood warning for the Thames is removed.

Potential for vessels to moor

24. The jetty was originally constructed for offloading cargo from Thames Lighters; these vessels, with a capacity of circa 250-300 tonnes, were designed for use on drying berths such as Sugar Quay. More recently the jetty has been used for events with only occasional use for berthing a visiting Thames sailing barge. The duration of any visit by such a vessel is limited by the lack of water depth and the access stairs which do not extend down to low water.

25. The jetty licence from the PLA does not permit any vessel mooring nor does the Insurance.

26. The jetty is fixed in level and is therefore a tidal dependent berth. While the berth has previously been used as a drying berth this is only suitable for robustly constructed vessels designed for grounding. The wash generated by passing vessels such as Thames Clippers makes the berth unsuited for grounding by most vessels.

Public use of the small open space on the site if the jetty ceased to exist

27. The small open space would used in conjunction with the adjacent retail use on the ground floor. The applicant advises that the tenant would require certainty regarding the use of the space adjacent and that it would be impractical to enter into an Agreement which could require the possible provision of public access at some unspecified time in the future should the jetty cease to exist.

28. Access to the small open space would be of little real benefit to the public, especially when compared to the use of the jetty and the open area in front of the neighbouring Three Quays. Views from the open space would be limited and it might be regarded as more beneficial to continue to use this in conjunction with the proposed restaurant.

Conclusion

29. The information supplied by the applicant demonstrates that the jetty is safe for public use and that it will be maintained to satisfy the terms of the PLA licence. There is no real prospect of vessels being able to moor on the jetty because of the type of structure and its location.

30. The applicant has agreed to 24 hours public access subject to a review after an initial period and there will be appropriate structures, barriers and lighting on the jetty.

31. Public access to the jetty would be for the life of the building, subject to the jetty remaining in situ. Whilst this cannot be guaranteed, the jetty would only be removed if required by the PLA for navigational or river regime reasons.

32. It would be difficult to require the possible provision of public access to the small open space on the site at some unspecified time in the future because of the uncertainty that would cause to its use by the tenant of the retail space. In addition, would be limited benefit in public use of the small open space.

33. Public access to the proposed route over jetty is required to mitigate the reduction in amenity caused by reducing the headroom over the Riverside Walkway at Sugar Quay. This would be the only jetty in the City to which public access will have been secured.

34. The applicant has agreed make this provision and the information provided demonstrates that Section 106 agreement would make provision for adequate public access.

PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 23 February 2016

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 10.30 am

Present

Members:

Randall Anderson
Emma Edhem
Marianne Fredericks (Deputy Chairman)
George Gillon
Alderman Timothy Hailes
Deputy Brian Harris
Graeme Harrower
Gregory Jones QC
Deputy Henry Jones
Alderman Professor Michael Mainelli
Paul Martinelli
Brian Mooney
Sylvia Moys
Graham Packham
Judith Pleasance
Deputy Henry Pollard
Alderman William Russell
James de Sausmarez
Graeme Smith
Patrick Streeter
Deputy James Thomson
Michael Welbank (Chairman)

Officers:

Paul Beckett	-	Department of the Built Environment
Deborah Cluett	-	Comptroller and City Solicitor's Department
Carolyn Dwyer	-	Director of Built Environment
Annie Hampson	-	Department of the Built Environment
Ian Hughes	-	Department of the Built Environment
Alison Hurley	-	City Surveyor’s
Karen McHugh	-	Principal Legal Assistant
Simon Murrells	-	Assistant Town Clerk
Martin O'Regan	-	City of London Police
Simon Owen	-	Chamberlain's Department
Steve Presland	-	Department of the Built Environment
Amanda Thompson	-	Town Clerk's Department
Peter Young	-	City Surveyor's Department

1. **APOLOGIES**

Apologies for absence were received from Alex Bain-Stewart, Dennis Cotgrove, Revd Dr Martin Dudley, Deputy Bill Fraser and Christopher Hayward.

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

Alderman Timothy Hailes declared a personal interest in agenda item 12 – London Wall Car Park – by virtue of being a Managing Director of JP Morgan Chase.

3. **MINUTES**

RESOLVED – That the minutes of the meeting held on 2 February 2016 be approved subject to the addition of Deputy Henry Pollard's apologies being recorded.

Matters Arising

Contact Centre – The Town Clerk reported that staff in the Contact Centre had now been made aware who Members were and the manager had spoken to Revd Dr Martin Dudley to get the full details of his complaint. The member of staff concerned was new and although action was eventually taken this had been slower than usual.

The Deputy Chairman also raised a concern regarding the length of time it had recently taken for an important email sent to the Contact Centre for her attention to be forwarded onto her and the Town Clerk agreed to look into it.

Cycle Superhighway – The Director of the Built Environment reported that the Streets and Walkways Sub-Committee had recently approved the making of an experimental traffic order in relation to the proposed road closures.

4. **TOWN PLANNING AND DEVELOPMENT APPLICATIONS**

The Committee received a report of the Chief Planning Officer and Development Director in respect of development and advertisement applications dealt with under delegated authority.

RESOLVED – That the report be noted.

5. **VALID APPLICATIONS LIST FOR COMMITTEE**

The Committee received a report of the Chief Planning Officer and Development Director which provided details of valid planning applications received by the department since the last meeting.

RESOLVED – That the report be noted

6. REPORTS RELATIVE TO PLANNING APPLICATIONS

6.1 Sugar Quay, Lower Thames Street

The Committee received a report of the Chief Planning Officer in relation to the redevelopment of Sugar Quay and the issue of public access under Section 106 provision.

The Chief Planning officer reported that 24 hour access to the jetty had finally been secured subject to an initial period of review should any antisocial behaviour of safety issues become apparent. However the jetty licence from the PLA did not permit any vessel moorings because of the type of structure and its location.

In response to questions the Chief Planning officer advised that maintenance of the jetty was the responsibility of the licence holder, and the licence itself set out the maintenance requirements. The question of whether or not the jetty was suitable for moorings had been raised directly with PLA but the license did not permit this.

RESOLVED - That

a) a deed of variation of the Section 106 agreement dated 16th September 2013 be entered into to provide 24 hour public access to the Sugar Quay jetty, the decision notice not to be issued until such obligations have been executed; and

b) Officers be instructed to negotiate and execute the deed of variation to the Section 106 agreement.

6.2 20 Fenchurch Street - Skygarden

The Committee received a report of the Chief Planning Officer recommending approval of the Visitor Management Plan (VMP) setting out details of the access, ticketing and security arrangements applicable to the Sky Garden.

The Chief Planning Officer reported that following extensive discussions, and as a result of Members view that the initial arrangements were too restrictive, there had been quite a lot of changes to the VMP and adjustments to operational arrangements.

In response to questions the Chief Planning Officer advised that provision to enable walk-ins to cover no-shows would be a reasonable request to include within the review procedure, as would a procedure enabling City of London planning officers to conduct random visits although these could not be anonymous.

RESOLVED - That the Visitor Management Plan be approved

6.3 **Adoption of Fleet Street, Whitefriars and Chancery Lane Character Summaries and Management Strategies Supplementary Planning Documents**

The Committee received a report of the Chief Planning Officer detailing proposed amendments to the Supplementary Planning Documents (SPD) for the Fleet Street, Whitefriars and Chancery Lane conservation areas following the public consultation from October 2015 until January 2016.

RESOLVED – That

a) the amendments to the Fleet Street, Whitefriars and Chancery Lane Supplementary Planning Documents listed in Appendix C be agreed; and

b) Members adopt the amended Fleet Street Conservation Area, Whitefriars Conservation Area and Chancery Lane Conservation Area SPDs.

7. REPORTS OF THE DIRECTOR OF THE BUILT ENVIRONMENT

7.1 **Road Danger Reduction Plan 2016/17**

The Committee received a report detailing the progress made in reducing road traffic casualties on City Streets and setting out proposals for achieving further reductions in the future.

Members noted the proposal reflected an important emphasis on 6 key actions areas of enforcement, engineering, business engagement and behavioural change, reviewing and learning from the successes of others, reviewing staff location and strengthened working with TfL and the GLA.

Several Members commented that the risks taken by cyclists and pedestrians were increasing as well as those of motorists, and there was a need to encourage behavioural change and raise awareness of the dangers to all road users.

In response to a question concerning why a 10mph speed limit could not be imposed, the Director of the Built Environment advised that TfL were unlikely to agree to such a proposal.

Members also commented that the published target for reducing casualties should be zero.

RESOLVED that the Road Danger Reduction Programme be agreed.

7.2 **Department of the Built Environment - Business Plan Progress Report for Q3 2015/16**

The Committee received a report setting out the progress made during Q3 (October December) against the 2015/18 Business Plan showing what had been achieved together with the progress made against departmental objectives and key performance indicators.

Members asked that an alternative indicator to smiley faces be used in future when reporting road safety issues as these could be perceived to be insensitive.

In response to a question concerning DM2 the Chief Planning Officer agreed to report back.

RESOLVED that the report be noted.

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

Queen Hithe – In response to a question concerning a 12-14 minutes diversion which used to be a 1 minutes diversion, the Director of the Built environment advised that it would be possible to send an officer to a ward meeting which TfL should also be invited to.

Planning Presentation – In response to a question concerning why the planning presentation had not been emailed to Members in advance of the meeting, the Town Clerk agreed that this would be looked in to and circulated to Members.

9. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

The Committee received a tabled paper updating on the completion of lift repairs at London Wall West, Milennium Bridge Inclinator and Speed House (Silk Street).

Members were advised that completion of the repairs at London Wall West and Speed House had been delayed due to the impact of third parties beyond the control of the City Surveyor and appropriate steps had been identified to prevent any repeat delays.

Members expressed concern at the time taken to rectify the fault with the Milennium Bridge Inclinator as this was the only lift in the area with disabled access. Also users would not be aware the lift was out of service until they actually tried to use it.

10. **EXCLUSION OF THE PUBLIC**

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

11. **NON-PUBLIC MINUTES**

RESOLVED – That the non-public minutes of the meeting held on 2 February 2016 be approved subject to the addition of Deputy Henry Pollard's apologies being recorded.

12. **LONDON WALL CAR PARK - COLP ACCOMMODATION STRATEGY**

This report was deferred.

13. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

Noted.

14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

The meeting closed at 12.50 pm

Chairman

Contact Officer: Amanda Thompson
tel. no.: 020 7332 3414
amanda.thompson@cityoflondon.gov.uk

Planning Obligations Comments (City CIL, Mayoral CIL and S106)

Address: *Sugar Quay Jetty, Sugar Quay Walk, London*
Application Reference: *24/01196/FULL*
Case Officer: *Samuel James*
Description: *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.*

The development constitutes a change of use and does not propose an uplift in floor area. As a result, the development would not be liable for CIL.

It is the applicant's responsibility to notify the Local Planning Authority of any changes to the proposal and occupancy of the building as the development may become liable for Mayoral and City CIL.

Planning obligations would not apply in this instance as no uplift in floorspace is proposed.

Planning Obligations
11/12/2024 CE

From: Varma, Vimal <[redacted]>
Sent: 13 December 2024 23:58
To: James, Samuel <[redacted]
Cc: Turner, Lee <[redacted]
Subject: 24/01196/FULL - Sugar Quay Jetty Sugar Quay Walk

Hi Samuel,

The existing waste storage and collection facilities for the restaurant are adequate for this proposal and comply with our requirements. This Division will, therefore, raise no objections to this application.

They will need an additional 1 x 1100ltr wheelie bin or increased collections to cope with the waste that will be generated.

Thanks

Vimal

-----Original Message-----
From:[redacted]
Sent: 06 December 2024 10:02
To: Varma, Vimal <[redacted]; Turner, Lee
<[redacted]>
Subject: Planning Application Consultation: 24/01196/FULL

Dear Sir/Madam

Please see attached consultation for Sugar Quay Jetty Sugar Quay Walk London .
Reply with your comments to HYPERLINK "mailto:PLNComments@cityoflondon.gov.uk"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Samuel James
Environment Department
City of London

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone [redacted]
Email [redacted]

Date 19 December 2024
Our Ref DS/SUDS24/006X
Your Ref PT_SJ/24/01196/FULL
Subject Sugar Quay Jetty Sugar Quay Walk London

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has undertaken a review of the information provided in the above application and does not consider the proposed scheme to satisfy the requirements of planning policy in regard to flooding, the LLFA therefore recommends that the application be rejected. This is for the following reasons:

1. A Flood Warning and Evacuation Plan setting out safe egress and access routes has not be provided and as such it is not possible to agree routes. This needs to be provided before the application can be approved.
2. The proposal is not considered to fall within the 'Water-compatible development' category under the National Planning Policy Framework Annex 3: Flood risk vulnerability classification. As such in accordance with Table 2: Flood risk vulnerability and flood zone 'incompatibility' should not be permitted in Flood Zone 3b (which the proposal appears to be).

If you are aware of any aspect of the proposal that I may have missed that you would like me to have a look at please feel free to contact me.

Tim Munday

Tim Munday
Lead Local Flood Authority
(District Surveyor's Office)

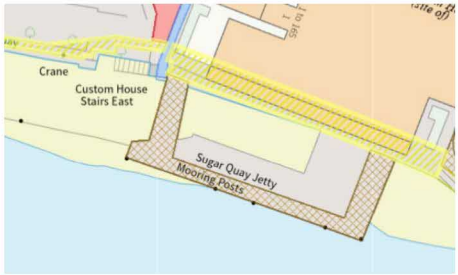
[redacted]

From: Minas, Aggie <[redacted]>
Sent: 13 March 2025 15:39
To: James, Samuel <[redacted]>; Brett, Peter <[redacted]>; Alexander-Newton, Kate <[redacted]>; Donal Rooney <[redacted]>
Cc: Pye, Rachel <[redacted]>; Hughes, Ian <[redacted]>; Begolli, Nora <[redacted]>; Breese, Robert <[redacted]>
Subject: RE: Sugar Quay Planning Application for tables and chairs on jetty 24/01196/FULL

Dear Sam,

Apologies for the delay in responding to you.

The proposed area appears to be private land:



From a licensing perspective, this would not require a pavement licence for the tables and chairs

as a ‘relevant highway’ under the Business and Planning Act 2020 does not include privately owned land.

However, the proposal for the bar on the jetty would require a premises licence under the Licensing Act 2003 for the sale of alcohol because the sale is licensable irrespective of where it takes place. An occupier can apply for one premises licence to incorporate the premises and the external area as indicated on their plan, and conditions can define how and when the internal and external areas can be used e.g. alcohol sales may be permitted internally until 11pm with off-sales only permitted on the City Walkway and a restriction on alcohol sales to an earlier hour on the jetty to mitigate resident concerns. Conditions can also be imposed to state that alcohol sales on the jetty can only be made by waiter service only and restricted to persons seated (so no standing on the jetty). The food sales/service and transportation of it across city walkway falls outside of my team’s remit.

An occupier can opt to have two separate premises licences; one for the internal space and one for the jetty space, and again, can be subject to conditions. Any application would be subject to a statutory consultation, and I am sure the same concerns would be raised in respect of noise. This would trigger a licensing subcommittee hearing.

My colleague, Rob Breese, had a pre-application site meeting with the landlord last year some time and would have relayed this information to them.

I am happy to attend a meeting with other stakeholders to discuss all the possible options in advance of the planning committee in May if it helps you.

Best regards
Aggie

Aggie Minas| Licensing Team Manager
Telephone: [redacted] Mobile: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] www.cityoflondon.gov.uk

Katie Stewart, Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

From: James, Samuel <[redacted]>
Sent: 05 March 2025 14:59
To: Brett, Peter <[redacted]>; Minas, Aggie <[redacted]>; Alexander-Newton, Kate <[redacted]>; Donal Rooney <[redacted]>
Cc: Pye, Rachel <[redacted]>; Hughes, Ian <[redacted]>; Begolli, Nora <[redacted]>
Subject: Sugar Quay Planning Application for tables and chairs on jetty 24/01196/FULL

Hi Peter and Aggie,

I don't believe we've met - I am one the City's planning officers and I'm working on the above planning application for: *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. I've attached a proposed site plan, and very basic draft operational management plan.*

The proposed use, if approved, would allow tables and chairs and a small bar/servery area in association with the restaurant bar/unit at ground floor of Sugar Quay, an operator has not yet been specified. Proposed plan attached showing the layout of the proposal on the jetty. The proposal would require the operator to cross City Walkway with food and beverages to get from the kitchen in the main building out to the terrace on the jetty.

There have been around 45 resident objections relating to noise etc. from the proposed use and the planning application is likely to go to committee for determination in May.

I've consulted Kate and Donal on this, and they also have quite a few concerns from a noise pollution and operational perspective. They mentioned that it would be useful to have some advice from the commercial/food safety teams, as well as possibly licensing to see what your concerns and requirements for a business of this nature would be.

For example - Peter, would you have health and safety concerns about food produce being transported across City Walkway onto the jetty from inside the building? Also are there health and safety concerns with regard to trolleys being used to transport meals, used plates and glasses etc. between Sugar Quay Jetty to the main restaurant building.

Aggie, could you also please check if your team have been approached yet with regard to this site, and let me know if you'd have any advice or comments at this stage?

@Alexander-Newton, Kate and @Donal Rooney - Please could you add any other thoughts you had that would be relevant for Peter and Aggie?

Please let me know if the above isn't clear or you'd like to discuss for more info on this. I am happy to set up a meeting for all to discuss.

Kind regards,

Sam

Samuel James | **Planning Officer (Development Management)**
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted]
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment



From: Brett, Peter <[redacted]>
Sent: 21 March 2025 16:35
To: James, Samuel <[redacted]>
Cc: Pye, Rachel <[redacted]>
Subject: RE: Sugar Quay Planning Application for tables and chairs on jetty 24/01196/FULL

Samuel

I've tried several times to contact you by phone without success.

I've spoken with my pollution colleague (Kate) and now with Rachel Pye too. Hopefully the information below is useful but please contact me if you need more detail.

In essence I don't think there's a significant case for objection to this proposal from a health and safety perspective alone, certainly not around transporting things across the City Walkway.

However, the walkway can be a very busy location and we would expect any business to consider the additional risk that might be posed from taking food and equipment to and from their premises to the Quay area. Risks such as manual handling to their staff, https://www.hse.gov.uk/pubns/cais24.htm These risks can be controlled by using equipment like trolleys; these would need to be selected carefully so they were fit for purpose, not just from a health and safety perspective but also to account for the potential additional noise such equipment might cause.

The other (harder to control) concern I would raise is around rat activity on the pier; this is

something that might be very difficult for any business to deal with. Rats are pretty omnipresent on the river front and have already caused previous problems at this location (accessing food in the refuse bins) If any food business was to operate on the Quay there would be an ongoing concern both from potential contamination to any food and food equipment but also an ongoing risk that they might be attracted to the area by food spillages. This is a much different potential to risks with existing fixed premises which front the river as these can be proofed to prevent access.

Dealing with some of these issues is not impossible but could have the affect of increasing noise potential, e.g. having to remove all equipment from the pier each night, jet washing the pier to remove food spillages.

I'd be happy to speak to you and expand on these points if it would assist.

Kind regards

Peter

From: Brett, Peter <[redacted]>
Sent: 20 March 2025 17:26
To: James, Samuel <[redacted]>
Subject: Re: Sugar Quay Planning Application for tables and chairs on jetty 24/01196/FULL

I tried calling earlier today. Are you around tomorrow for a quick call, after 1100?
Peter

Sent from Outlook for iOS

From: James, Samuel <[redacted]>
Sent: Thursday, March 20, 2025 11:44:17 AM
To: Alexander-Newton, Kate <[redacted]>; Donal Rooney <[redacted]>; Brett, Peter <[redacted]>
Cc: Pye, Rachel <[redacted]>; Hughes, Ian <[redacted]>; Begolli, Nora <[redacted]>; Breese, Robert <[redacted]>; Minas, Aggie <[redacted]>
Subject: Re: Sugar Quay Planning Application for tables and chairs on jetty 24/01196/FULL

Hi Aggie, thank you for the below response that's helpful. I may take you up on your offer of a meeting with all, but I'll let you know in due course.

@Brett, Peter - please let me know if you wanted to make any further observations or comments from your team's point of view, this would be appreciated.

@Alexander-Newton, Kate and @Donal Rooney - in light of Aggie's comments would you please be able to provide me with your formal observations and comments. I need

to feed these comments back to the applicant ASAP, so they have a chance to provide a response before the committee. You previously mentioned you had concerns with the submitted noise assessment, please could you include these in writing if the noise assessment is not acceptable. Would it also be possible to comment on the secondary noise assessment I sent you, which was submitted by a group of objectors to the scheme?

If the proposal is not acceptable from a noise perspective in your view, then that could be a reason to recommend refusal of the application, so it would be great if your response could be really clear on this. Would you recommend the noise reports be tested by a third party, if you aren't able to make this assessment yourselves?

Many thanks,

Sam

Samuel James | **Planning Officer (Development Management)**
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted]
www.cityoflondon.gov.uk

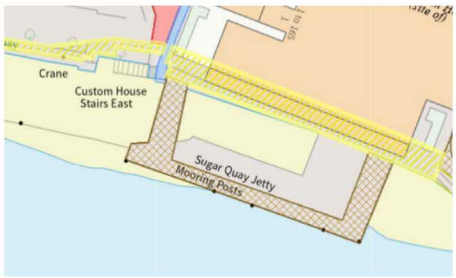
Katie Stewart – Executive Director Environment

From: Minas, Aggie <[redacted]>
Sent: 13 March 2025 15:39
To: James, Samuel <[redacted]>; Brett, Peter <[redacted]>; Alexander-Newton, Kate <[redacted]>; Donal Rooney <[redacted]>
Cc: Pye, Rachel <[redacted]>; Hughes, Ian <[redacted]>; Begolli, Nora <[redacted]>; Breese, Robert <[redacted]>
Subject: RE: Sugar Quay Planning Application for tables and chairs on jetty 24/01196/FULL

Dear Sam,

Apologies for the delay in responding to you.

The proposed area appears to be private land:



From a licensing perspective, this would not require a pavement licence for the tables and chairs as a 'relevant highway' under the Business and Planning Act 2020 does not include privately owned land.

However, the proposal for the bar on the jetty would require a premises licence under the Licensing Act 2003 for the sale of alcohol because the sale is licensable irrespective of where it takes place. An occupier can apply for one premises licence to incorporate the premises and the external area as indicated on their plan, and conditions can define how and when the internal and external areas can be used e.g. alcohol sales may be permitted internally until 11pm with off-sales only permitted on the City Walkway and a restriction on alcohol sales to an earlier hour on the jetty to mitigate resident concerns. Conditions can also be imposed to state that alcohol sales on the jetty can only be made by waiter service only and restricted to persons seated (so no standing on the jetty). The food sales/service and transportation of it across city walkway falls outside of my team's remit.

An occupier can opt to have two separate premises licences; one for the internal space and one for the jetty space, and again, can be subject to conditions. Any application would be subject to a statutory consultation, and I am sure the same concerns would be raised in respect of noise. This would trigger a licensing subcommittee hearing.

My colleague, Rob Breese, had a pre-application site meeting with the landlord last year some time and would have relayed this information to them.

I am happy to attend a meeting with other stakeholders to discuss all the possible options in advance of the planning committee in May if it helps you.

Best regards
Aggie

Aggie Minas| Licensing Team Manager
Telephone: [redacted] Mobile: [redacted]
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted] www.cityoflondon.gov.uk

Katie Stewart, Executive Director Environment

For further details about how and why we process your personal data, please see our Privacy Notice, available at www.cityoflondon.gov.uk/privacy

From: James, Samuel <[redacted]>
Sent: 05 March 2025 14:59
To: Brett, Peter <[redacted]>; Minas, Aggie <[redacted]>; Alexander-Newton, Kate <[redacted]>; Donal Rooney <[redacted]>
Cc: Pye, Rachel <[redacted]>; Hughes, Ian <[redacted]>; Begolli, Nora <[redacted]>
Subject: Sugar Quay Planning Application for tables and chairs on jetty 24/01196/FULL

Hi Peter and Aggie,

I don't believe we've met - I am one the City's planning officers and I'm working on the above planning application for: *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. I've attached a proposed site plan, and very basic draft operational management plan.*

The proposed use, if approved, would allow tables and chairs and a small bar/servery area in association with the restaurant bar/unit at ground floor of Sugar Quay, an operator has not yet been specified. Proposed plan attached showing the layout of the proposal on the jetty. The proposal would require the operator to cross City Walkway with food and beverages to get from the kitchen in the main building out to the terrace on the jetty.

There have been around 45 resident objections relating to noise etc. from the proposed use and the planning application is likely to go to committee for determination in May.

I've consulted Kate and Donal on this, and they also have quite a few concerns from a noise pollution and operational perspective. They mentioned that it would be useful to have some advice from the commercial/food safety teams, as well as possibly licensing to see what your concerns and requirements for a business of this nature would be.

For example - Peter, would you have health and safety concerns about food produce being transported across City Walkway onto the jetty from inside the building? Also are there health and safety concerns with regard to trolleys being used to transport meals, used plates and glasses etc. between Sugar Quay Jetty to the main restaurant building.

Aggie, could you also please check if your team have been approached yet with regard to this site, and let me know if you'd have any advice or comments at this stage?

@Alexander-Newton, Kate and @Donal Rooney - Please could you add any other thoughts you had that would be relevant for Peter and Aggie?

Please let me know if the above isn't clear or you'd like to discuss for more info on this. I am happy to set up a meeting for all to discuss.

Kind regards,

Sam

Samuel James | **Planning Officer (Development Management)**
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted]
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Memo

To Assistant Director (Development Management)
Environment
Email: plncomments@cityoflondon.gov.uk
Case Officer

From Kate Alexander-Newton
Environmental Health Officer
Telephone [redacted]
Email [redacted]

Date 26.03.2025.
Our Ref 24/07125/NPLN
Your Ref 24/01196/FULL
Subject 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. | Sugar Quay Jetty Sugar Quay Walk London

Pollution control concerns in relation to the application

This department raises a number of concerns in relation to the use of the Sugar Quay Jetty as a restaurant /drinking establishment under Sui Generis

1. **Operation activities generating noise.**

The proposed seven-day operation of a dining and drinking area on the jetty poses many operational issues, many of which would give rise to an increase in noise level in the area. Namely the set up and shut down of the bar each day which would involve the transportation of bottles, crockery etc across the public Thames Path. Trolleys would create noise by operation over the path and additional noise would be generated by goods housed in the trolleys generating 'rattling' noise when moved. Hot food and used cutlery/crockery glass wear etc, would also be constantly moving across the path to and from the kitchen in the main restaurant throughout the proposed operational hours.

2. **Impact on residents above jetty**

The application and both noise reports (applicant and objectors) indicate a "substantial impact" from noise on the residents in Quay House. Residents have balconies and can be expected to want to have windows or doors open particularly in the summer.

The majority of this noise will be from patrons and will be difficult to control. The operation is requested everyday. It is likely that this will be the dominant noise source.

3. Hours of use

Proposed operational hours of use of the jetty for the service of food and drink to the public are 09.00 to 21.00 hours. It must be decided if these are ‘operation hours’ or ‘trading hours’ as allowances need to be made for the cleaning and clearing of the jetty each evening and the setting up and opening each morning. These must not be noise generating activities if outside operational hours, which would be very difficult to manage and control given the nature operation, noted above in point one.

4. Safety and security of jetty outside of operation

It is unclear if the seating for the restaurant is fixed or moveable. There would be an issue with site safety and security if the furniture were to be moveable and left in situ overnight. There would also be a risk of break in/theft/vandalism if bar related items are stored outside overnight. If the furniture is to be left in situ this will attract the general public to use the area outside operational hours giving rise to an unmanaged noise source, how would this be controlled?

If the applicant proposed furniture to be taken in each night then this would need to be within the proposed hours of operation, this department would need details of where furniture would be stored prior to the main restaurant closing hours, which it is assumed would be later than the use of the jetty.

5. Mitigation

The submitted noise impact assessment conducted by *Quantum Acoustics on 11 November 2024* details suggestions that the sites proposed external seating area is acceptable in the context of *noise related national, citywide and local planning policy and industry standard good practice a guidance,* This document suggest mitigating conditions , such as limiting the maximum number of external patrons, operational hours via the premises license application and a Noise Management plan.

Such noise mitigation measures would not be possible to apply under a planning regime and would rely on control under the licensing. In this instance it would be very difficult to mitigate noise from persons. The operational hours alone would mean that there is no respite from the daily activities of the restaurant being a 7 day operation.

This information contradicts detail in the aforementioned RBA Acoustics report produced in January 2025

If committee/planning department choose to approve this application, the environmental Health Pollution team has the following comments and observations to make.

Waiter service restaurant only

The property (Jetty) must only be used as a seated venue. The bar area must only be used by waiter-service for seated guests within the restaurant.

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.

Music

No live or recorded music shall be played on the Jetty

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.

Hours of opening

I16D The Jetty area hereby permitted shall not be open to customers between the hours of (21:00) on one day and (09:00) on the following day.

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.

Hours of Servicing

I18C No servicing of the premises shall be carried out between the hours of 19:00 on one day and 09:00 on the following day from Monday to Saturday and between 19:00 on Saturday and 09:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

Promoted Events

I28 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 19:00 and 09:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

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.

Plant noise

M7D (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

M19C Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: ***In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.***

Lighting

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

REASON: *To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036*

Kate Alexander-Newton
Environmental Health Officer
Pollution Team – Environment

Mob: [redacted]

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone 020 7332 1949
Email tim.munday@cityoflondon.gov.uk

Date 21 May 2025
Our Ref DS/SUDS24/0065
Your Ref PT_SJ/24/01196/FULL
Subject Sugar Quay Jetty Sugar Quay Walk London

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the additional information supplied by the applicant and wishes to withdraw its previous objection as set out in our memo dated 19th December 2024.

The Lead Local Flood Authority has no further comment regarding the application.

Planning Obligations Comments (City CIL, Mayoral CIL and S106)

Application Reference: *24/01196/FULL*
Site: *Sugar Quay Jetty Sugar Quay Walk London*
Case Officer: *Samuel James*
Application 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*

CIL and Planning Obligations

1. The development constitutes a change of use and does not propose an uplift in floor area greater than 100sqm. As a result, the development would not be liable for CIL and would not require a legal agreement under Section 106 of the Town and Country Planning Act 1990.

It is the applicant's responsibility to notify the Local Planning Authority of any changes to the proposal and occupancy of the building as the development may become liable for Mayoral and City CIL. Should planning permission be granted an appropriate informative will be appended to the decision.

Informative – 005B

Informative 005B - CIL

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sqm
Retail £165 sqm
Hotel £140 sqm
All other uses £80 per sqm
These rates are applied to "chargeable development" over 100sqm (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sqm for offices, £150 per sqm for Riverside Residential, £95 per sqm for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or

apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: https://www.planningportal.co.uk/planning/policy-and-legislation/CIL/download-the-forms)

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

Planning Obligations

06/06/2025

EK

This page is intentionally left blank

From: [redacted]
To:
Cc:
Subject: Port of London Authority Response (DC 216) Plan ref: 24/01196/FULL Sugar Quay Jetty
Date: 20 December 2024 14:36:37

THIS IS AN EXTERNAL EMAIL

FAO: Samuel James

Dear Samuel

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned application, for the proposed works at part of Sugar Quay Jetty, Lower Thames Street. I have now had the opportunity to review the submitted documents and have the following comments to make. In principle the PLA has no objection to the proposed development, for the use of part of Sugar Quay Jetty in association with the restaurant and drinking establishment use located on the ground floor of the adjacent Sugar Quay, and the early engagement of the applicant with the PLA on the proposed works has been welcomed. As part of the application it is welcomed that the submitted Design and Access Statement in section 3.4 (Access Rights) states that the existing access/stairs between the jetty and the Tidal Thames (on the Southern elevation of the jetty) will be maintained, providing the opportunity for third party users to benefit from access to the river for river related uses.

This is linked with London Plan Policy SI 17 (Protecting and enhancing London's waterways) which states that development proposals into the waterways, including permanently moored vessels, should generally only be supported for water-related uses or to support enhancements of water-related uses, as well as the City of London's Core Strategic Policy CS9 (Thames and the Riverside) which states that the City will promote the functional uses of the River Thames and its environs for transport, navigation and recreation. Linked with this, the PLA consider that it would be appropriate for an associated planning condition to be included as part of any forthcoming planning permission on continuing to investigate the potential to utilise and promote the site for river related uses, including potential wording as follows:

"The potential to use the jetty for river related activities as part of the proposed development, or for another commercial use, shall be actively pursued, and a report demonstrating this work shall be prepared and submitted for approval in writing by Local Planning Authority, in consultation with the Port of London Authority. The report shall be submitted a maximum of one year after the commencement of the development and bi-annually thereafter demonstrating the steps which have been taken to achieve such river related use.

I hope these comments are of assistance.

Regards

Michael

Michael Atkins
Senior Planning Officer

Port of London Authority
[redacted]

[redacted]



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient, you are hereby notified that any use or dissemination of this communication is strictly prohibited, and asked to notify us immediately (by return email), then delete this email and your reply. Email transmissions cannot be guaranteed to be secure or error-free and Port of London Authority (PLA) does not accept any liability for any errors or omissions in the contents of this message. Any views or opinions presented are those of the author and do not necessarily represent those of PLA.

Samuel James
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/137711/01
Your ref: 24/01196/FULL

Date: 23 December 2024

Dear Samuel

Sugar Quay Jetty, Sugar Quay Walk, London.

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.

Thank you for consulting us on the above application on 9 December 2012. As part of the consultation we have reviewed the following document:

- Document titled 'LANDMARK HOUSE, SUGAR QUAY, LONDON - FLOOD RISK ASSESSMENT' prepared by Odyssey Development Journeys (ref:24-028, dated April 2024).

Environment Agency position

We have **no objections** to the proposed development.

The applicant has confirmed that the finished floor levels of the jetty will be above the Present Day Extreme Water Level and Future 2065-2100 Design Water Level in paragraph 5.2.9 of the FRA.

We are also satisfied that:
• The developer has assessed the risk from a breach in the Thames tidal flood defences using the latest modelled tidal breach data.
• The proposal does not include any sleeping accommodation below the modelled tidal breach flood level.

The proposal does not have a safe means of access and/or egress in the event of flooding from all new buildings to an area wholly outside the floodplain.

Advice to LPA:

Flood resistance and resilience
We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx

British Standard 85500 – Flood resistant and resilient construction
https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686

Flood risk issues not within our direct remit
The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Flood warning and emergency response
We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their

decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 173 of the NPPF and the guiding principles of the PPG.

Advice to applicant:

Signing up for flood warnings
The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit https://www.gov.uk/sign-up-for-flood-warnings. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit https://www.gov.uk/prepare-for-flooding

To get help during a flood, visit https://www.gov.uk/help-during-flood

For advice on what do after a flood, visit https://www.gov.uk/after-flood

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

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

Yours sincerely,

Demitry Lyons
Sustainable Places Planning Advisor

[redacted]

creating a better place
for people and wildlife

Environment Agency

Samuel James
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/137711/02
Your ref: 24/01196/FULL

Date: 22 May 2025

Dear Samuel

Sugar Quay Jetty, Sugar Quay Walk, London.

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.

Thank you for re-consulting us on the above application on 13 May 2025, following the submission of amended plans.

Environment Agency position:

The amendments do not affect our position. We therefore maintain a **no objections** response to the proposed development.

The applicant has confirmed that the finished floor levels of the jetty will be above the Present Day Extreme Water Level and Future 2065-2100 Design Water Level in paragraph 5.2.9 of the FRA.

We are also satisfied that:
• The developer has assessed the risk from a breach in the Thames tidal flood defences using the latest modelled tidal breach data.
• The proposal does not include any sleeping accommodation below the modelled tidal breach flood level.

The proposal does not have a safe means of access and/or egress in the event of flooding from all new buildings to an area wholly outside the floodplain.

Informative:

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

- on or within 8 metres of a main river (16 metres if tidal)

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

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

Advice to LPA:

Flood resistance and resilience
We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx

British Standard 85500 – Flood resistant and resilient construction
https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686

Flood risk issues not within our direct remit
The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures

- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Flood warning and emergency response
We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. Planning Practice Guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 of the National Planning Policy Framework and the guiding principles of the PPG.

Advice to applicant

Signing up for flood warnings
The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit https://www.gov.uk/sign-up-for-flood-warnings. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit https://www.gov.uk/prepare-for-flooding

To get help during a flood, visit https://www.gov.uk/help-during-flood

For advice on what do after a flood, visit https://www.gov.uk/after-flood

Final comments:

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

Yours sincerely,

Demitry Lyons
Sustainable Places Planning Advisor

Email: hnlsustainableplaces@environment-agency.gov.uk
Telephone: 020 7714 0578

From: [redacted]
To:
Cc:
Subject: Port of London Authority response (DC 216) Plan ref: 24/01196/FULL Sugar Quay Jetty
Date: 02 June 2025 10:16:22
Attachments: Port of London Authority Response (DC 216) Plan ref 2401196FULL Sugar Quay Jetty.msg

THIS IS AN EXTERNAL EMAIL

FAO: Samuel James

Dear Samuel

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned application, for the 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. I have now had the opportunity to review the submitted documents and can confirm the PLA have no further comments to make on the application, in addition to those made on the 20th December 2024, which remain valid and are attached above for information.

Regards

Michael

Michael Atkins
Senior Planning Officer

Port of London Authority
[redacted]

Follow us at @LondonPortAuth



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient, you are hereby notified that any use or dissemination of this communication is strictly prohibited, and asked to notify us immediately (by return email), then delete this email and your reply. Email transmissions cannot be guaranteed to be secure or error-free and Port of London Authority (PLA) does not accept any liability for any errors or omissions in the contents of this message. Any views or opinions presented are those of the author and do not necessarily represent those of PLA.

From: [redacted]
To:
Cc:
Subject: Port of London Authority Response (DC 216) Plan ref: 24/01196/FULL Sugar Quay Jetty

FAO: Samuel James

Dear Samuel

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned application, for the proposed works at part of Sugar Quay Jetty, Lower Thames Street. I have now had the opportunity to review the submitted documents and have the following comments to make. In principle the PLA has no objection to the proposed development, for the use of part of Sugar Quay Jetty in association with the restaurant and drinking establishment use located on the ground floor of the adjacent Sugar Quay, and the early engagement of the applicant with the PLA on the proposed works has been welcomed. As part of the application it is welcomed that the submitted Design and Access Statement in section 3.4 (Access Rights) states that the existing access/stairs between the jetty and the Tidal Thames (on the Southern elevation of the jetty) will be maintained, providing the opportunity for third party users to benefit from access to the river for river related uses.

This is linked with London Plan Policy SI 17 (Protecting and enhancing London's waterways) which states that development proposals into the waterways, including permanently moored vessels, should generally only be supported for water-related uses or to support enhancements of water-related uses, as well as the City of London's Core Strategic Policy CS9 (Thames and the Riverside) which states that the City will promote the functional uses of the River Thames and its environs for transport, navigation and recreation. Linked with this, the PLA consider that it would be appropriate for an associated planning condition to be included as part of any forthcoming planning permission on continuing to investigate the potential to utilise and promote the site for river related uses, including potential wording as follows:

"The potential to use the jetty for river related activities as part of the proposed development, or for another commercial use, shall be actively pursued, and a report demonstrating this work shall be prepared and submitted for approval in writing by Local Planning Authority, in consultation with the Port of London Authority. The report shall be submitted a maximum of one year after the commencement of the development and bi-annually thereafter demonstrating the steps which have been taken to achieve such river related use.

I hope these comments are of assistance.

Regards

Michael

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.
Case Officer: Samuel James

Customer Details

Name: Mr Gokhan Saygi
Address: 1 waterlane Flat121 London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This is a public area where London tower is viewed, public takes a rest.
There is a residential building where the residents settled and do not want a restaurant that will cause noise and smell of food 24/7.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Iain Reitze
Address: Flat 157 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:We have lived in Sugar Quay over 5yrs and look directly onto the Jetty. This Jetty is like our village green and it can be a real peaceful part of of living in The City of London.

Having restaurant seating out there with increase noise, smells, litter, broken glass, encourage drunkenness, rowdiness, vermin.

It will take away valuable public space in an iconic viewing area for tourisim and become dangerous as the jetty will become more congested.

This really is not conducive to have directly below residents rooms nor in keeping with this beautiful jetty out in the river.

Strongly object.

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.
Case Officer: Samuel James

Customer Details

Name: Dr Prasanna Sundaralingham
Address: 140 sugar quay London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I object to this proposal based on:

1) undue noise pollution to those living in the residential development as well as the hotel next door.
2) damage to the environment with risk of hygiene issues thereby attracting pests and vermin. This has previously been an issue causing damage to the jetty resulting in its temporary closure.
3) increased traffic in an area which is already busy due to tourists/buses/coaches/taxis
4) concerns regarding privacy as people will be able to see into apartments in the lower floors
5) offensive odours and food smells entering the apartment building which is undesirable
6) this will unduly affect the character of the area with a listed building next door which will affect its setting

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.
Case Officer: Samuel James

Customer Details

Name: Mr James Li
Address: Flat 102 Sugar Quay London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:As a long-term resident of Sugar Quay, we strongly object the planning application for a restaurant in our building and the jetty. While I appreciate the idea of new businesses, this proposal raises serious concerns for those of us living here.
1. Noise: A restaurant will bring late-night noise from customers, staff, and deliveries, disrupting the peace we value as residents.
2. Smells and Waste: Cooking odours, pest control and waste management could create unpleasant living conditions, especially in a shared building.
3. Traffic and Parking: Increased visitors and deliveries will strain parking and traffic in an already busy area.
4. Building Strain: More footfall could lead to extra wear and tear on communal areas and security concerns with people coming in and out.

We moved here for a peaceful, residential environment, and this proposal doesn't align with that. I hope you'll take our concerns into account and reject the application.

Thank you for your time and consideration.

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.
Case Officer: Samuel James

Customer Details

Name: Miss Antonia Osgood
Address: Flat 53 Sugar Quay 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:Overcrowding will be a serious issue. The area should be conserved, not used for carrying food to and from through a small pedestrianised area. Noise pollution will disturb myself and other residents. There will also be an increase in rats to the area due to food waste and spillages.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Alastair Macaulay
Address: 63 Sugar Quay 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:This area is a valuable public amenity as was recognized when permission to develop was granted. Changing its use and restricting access and egress not only deprives the community of this public space but also brings safety hazards in the event evacuation is needed whether from the jetty itself or from neighboring areas.

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.
Case Officer: Samuel James

Customer Details

Name: Ms Fiona Hazell
Address: Hamnvägen Stockholm

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The jetty is a space for sightseers to enjoy the views of tower bridge for free and should not be commercialized.

Contact the City

Reference: CTC 674165041

Date : 30/12/2024 16:30:46

Customer details

First Name	Patrick
Last Name	Goldrick
Customer Email Address	[redacted]
Telephone	[redacted]

Enquiry

Service Area	Planning
Enquiry	Consultation/Public objection
Enquiry type	Consultation/Public objection
statictext2	
Address	

FLAT 123 SUGAR QUAY, 1 WATER LANE LONDON EC3R 6AP

United Kingdom

Details Of Enquiry	SUGAR QUAY JETTY

End of email

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.
Case Officer: Samuel James

Customer Details

Name: Mrs Ting Qin
Address: Flat 107, Sugar Quay 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I strongly object to the proposed use of Sugar Quay Jetty for restaurant and drinking establishment purposes due to the following reasons:
1. Loss of Public Space: The jetty is a vital public amenity offering unobstructed access to the river. Privatizing this space for commercial use diminishes accessibility and sets a harmful precedent prioritizing private enterprises over public benefit.
2. Noise and Disturbance: Outdoor seating and service for a drinking establishment will result in significant noise pollution, particularly in the evenings, disturbing residents and visitors who seek the jetty for peace and tranquility.
3. Visual and Environmental Impact: Commercial furniture and planters will alter the jetty's natural riverside character, while increased activity risks littering and environmental degradation.
4. Congestion and Safety: The limited space on the jetty cannot handle increased footfall and service activities, raising safety concerns and obstructing pedestrian access.
5. Precedent for Commercialization: Approving this proposal risks encouraging further commercialization of public spaces, undermining the communal and open nature of London's riverside.

I urge the planning authority to reject this proposal to preserve the jetty as a valuable public resource.

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.
Case Officer: Samuel James

Customer Details

Name: Mrs Ting Qin
Address: Flat 107, Sugar Quay 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I strongly object to the proposed use of Sugar Quay Jetty for restaurant and drinking establishment purposes due to the following reasons:
1. Loss of Public Space: The jetty is a vital public amenity offering unobstructed access to the river. Privatizing this space for commercial use diminishes accessibility and sets a harmful precedent prioritizing private enterprises over public benefit.
2. Noise and Disturbance: Outdoor seating and service for a drinking establishment will result in significant noise pollution, particularly in the evenings, disturbing residents and visitors who seek the jetty for peace and tranquility.
3. Visual and Environmental Impact: Commercial furniture and planters will alter the jetty's natural riverside character, while increased activity risks littering and environmental degradation.
4. Congestion and Safety: The limited space on the jetty cannot handle increased footfall and service activities, raising safety concerns and obstructing pedestrian access.
5. Precedent for Commercialization: Approving this proposal risks encouraging further commercialization of public spaces, undermining the communal and open nature of London's riverside.

I urge the planning authority to reject this proposal to preserve the jetty as a valuable public resource.

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.
Case Officer: Samuel James

Customer Details

Name: Mr PAT GOLDRICK
Address: SUGAR QUAY 1 WATER LANE

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Sugar Quay Jetty is a public open space, with free accessible access 365 days /year.
It is utilised by hundreds of people from:
-Neighbouring communities, visitors, tourists, tour guide operators, accompanied schoolchildren & sutdents on educational tours, city & local workers, residents for walks.
- Frequently utilised platform to take pictures of iconic backgrounds (Tower Bridge, HMS Belfast, Shard).
- To watch, listen, video & photograph on Royal occasions, Canon salutes from Tower of London & HMS Belfast. Admire & capture the wonder of Tower Bridge opening/closing too.
- Exercising groups, performers, dancers to pracise their skills, children playing, families of all ages & abilities having fun

Sugar Quay Leaseholders pay 100% of the Jetty cost (circa. £100k p.a.) which includes Port London Authority, Licence, Lighting, Insurance, Housekeeping, Firtport management & fees.
These costs & fees are included in our 999 year leaseholders agreement.
My wife & I, both in our mid-seventies, have lived at Sugar Quay since 2018 with no recollection of noise disturbance, excessive smoke pollution or smells. We love our river facing home.
The Jetty is the only open space available to the Sugar Quay residents nearby.
In its current use, it forms the ambience & cornerstone of our community. We will be stripped of our regular daily walks which benefits our wellbeing.
I strongly object to the above planning permission.
Pat Goldrick

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.
Case Officer: Samuel James

Customer Details

Name: Mrs Ros Goldrick
Address: Sugar Quay-Flat123 Water Lane

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:Sugar Quay Jetty is a public open space, with free accessible access 365 days /year.
It is utilised by hundreds of people from:
-Neighbouring communities, visitors, tourists, tour guide operators, accompanied schoolchildren & students on educational tours, city & local workers, residents for walks.
- Frequently utilised platform to take pictures of iconic backgrounds (Tower Bridge, HMS Belfast, Shard).
- To watch, listen, video & photograph on Royal occasions, Canon salutes from Tower of London & HMS Belfast. Admire & capture the wonder of Tower Bridge opening/closing too.
- Exercising groups, performers, dancers to pracise their skills, children playing, families of all ages & abilities having fun

Sugar Quay Leaseholders pay 100% of the Jetty cost (circa. £100k p.a.) which includes Port London Authority, Licence, Lighting, Insurance, Housekeeping, Firstport management & fees. These costs & fees are included in our 999 year leaseholders agreement.
My husband & I, both in our mid-seventies, have lived at Sugar Quay since 2018 with no recollection of noise disturbance, excessive smoke pollution or smells. We love our river facing home.
The Jetty is the only open space available to the Sugar Quay residents nearby.
In its current use, it forms the ambience & cornerstone of our community. We will be stripped of

our regular daily walks which benefits our wellbeing.
I strongly object to the above planning permission.
Ros Goldrick

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.
Case Officer: Samuel James

Customer Details

Name: Miss Evie Watson
Address: The Bourne, Kingston Lane Uxbridge

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:
The jetty should not be commercialised because it is a place where tourists and locals go to see the stunning views of London City.

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.
Case Officer: Samuel James

Customer Details

Name: Jon Goldrick
Address: 168 West End road Ruislip

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This public space is highly valued by locals and tourists and is used by many as an outdoor exercise and wellbeing location. The proposed application will severely impact the enjoyment of this space by locals and visitors as well as significantly limit the use for any kind of exercise and wellbeing.

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.
Case Officer: Samuel James

Customer Details

Name: Mrs Joanna Watson
Address: The Bourne Kingston Lane Uxbridge

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This public space is highly used daily by local communities and tourists alike for well being, exercise and education about the many iconic London buildings and surrounding areas you can see from the jetty.
Changing it to commercial use will deprive the locals and tourists now and for many generations to come, the freedom to use this open space.

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.
Case Officer: Samuel James

Customer Details

Name: Miss Sophie Hill
Address: Sugar Quay, Apartment 83 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity
- Traffic or Highways

Comment:We have been residents of Sugar Quay since 2019 and strongly object to the proposals for the ground floor of the Sugar Quay building and the jetty.

Having a restaurant / drinks establishment on the ground floor will increase noise pollution and congestion within and surrounding the building, which will inevitably disrupt residents in their homes during early hours and late nights. We are particularly concerned at how this will encourage drunkenness and rowdiness in the area, and how this will compromise the security and atmosphere of Sugar Quay, with customers lingering around or attempting to gain access to the building entrance, which is located in close proximity to the ground floor / restaurant doors, and the jetty. We are dissatisfied with the disregard for the privacy and safety of residents.

Residents of Sugar Quay pay 100% of the costs surrounding the upkeep of the Jetty and we anticipate an increase in waste, broken glass, cigarette disposals, and litter and are dissatisfied with the prospect of continuing to pay such fees for it to become commercialised as a drinking and food establishment.

The jetty has been enjoyed all year round by communities and tourists alike for many years as a place to view iconic aspects of London (Tower and London Bridge, the Shard, etc) and to exercise, read, sit in the sun and relax. Being in close proximity to the Tower of London, it is

constantly occupied by tourists. We object to its privatisation as we feel this will deprive locals and tourists of the pleasure of an open and free space.

Sugar Quay has been a safe, peaceful and happy home for many years and we are apprehensive of the proposed plans.

Thank you for your consideration.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Wayne Watson
Address: The Bourne Kingston Lane Uxbridge

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:The Jetty is a space to be enjoyed by residents and tourists alike. It is used all year round and should not be for a commercial venture.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Kyle Watson
Address: The Bourne Kingston Lane Uxbridge

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I object to the proposal to enable the commercial use of the Sugar Quay jetty. Many residents and tourists alike use the space to enjoy the views that can be enjoyed from the space. The planned changes will have a detrimental impact on a multi-purpose jetty and create unnecessary noise pollution for local residents.

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.
Case Officer: Samuel James

Customer Details

Name: Stella Sutcliffe
Address: Cobwebs 108 Ebury Road Rickmansworth

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is a beautiful spot where people walk by and collectively enjoy the area without needing to pay to do so.

I have enjoyed this spot for years and would not want to see so much space taken up for commercial purposes.

It's a great place to exercise and now there may be people using it as a smoking area?

Isn't this a public place? - How can this be allowed?

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.
Case Officer: Samuel James

Customer Details

Name: Mr Mikael Olsson
Address: Flat 164, Sugar Quay 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:Sugar Quay Jetty is a public open space, with free accessible access 365 days /year. It is utilised by people of all kinds, residents, tourists people from neighbouring communities, schoolchildren & students local workers etc.
It has a free view to iconic landmarks as the Tower Bridge, HMS Belfast, the Shard etc and it is a safe, non commercial place for public use as photography, people exercising or just enjoying bathe neighbourhood.

Sugar Quay Leaseholders pay 100% of the Jetty cost (circa. £100k p.a.) which includes Port London Authority, Licence, Lighting, Insurance, Housekeeping, Firtport management & fees. These costs & fees are included in our 999 year leaseholders agreement.
My wife & I, both in our sixties, have lived at Sugar Quay since 2018 with no major noise disturbance (however the noise of party boats and exercising groups on the jetty is very audible however for short moments only), excessive smoke pollution or smells.
We love our river facing home.
The Jetty is the only open space available to the Sugar Quay residents nearby.
In its current use, it forms the ambience & cornerstone of our community. We will be stripped of our regular daily walks which benefits our wellbeing.
Any commercial use would limit public access and add very much noise, litter as well as other disturbances to this beautiful addition to the Thames area.

I strongly object to the above planning permission.
Kind regards
Mikael Olsson

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.
Case Officer: Samuel James

Customer Details

Name: Mrs Sonja Katarina Olsson
Address: Flat 164, Sugar Quay 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:
Sugar Quay Jetty is a public open space, with free accessible access 365 days /year.
It is utilised by hundreds of visitors, tourists, schoolchildren city & local workers and residents as well as exercising groups, performers, dancers, photographers.

Sugar Quay Leaseholders pay 100% of the Jetty cost (circa. £100k p.a.) which includes Port London Authority, Licence, Lighting, Insurance, Housekeeping, Firtport management & fees.
These costs & fees are included in our 999 year leaseholders agreement.
My wife & I, both in our sixties have lived at Sugar Quay since 2018 with no recollection of any major noise disturbance (except the noise from party boats and loud exercising groups, however it is only for a few minutes), excessive smoke, pollution or smells.
We love our river facing home.

In its current use it is a great addition to the riverfront. This would dramatically change to the worse with commercial use of part of the jetty in terms of view, access, noise, litter etc.
A change would be against the very fundamental reason why the jetty was built, why people like it so much.
I strongly object to the above planning permission.
Katarina Olsson

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.
Case Officer: Samuel James

Customer Details

Name: Mr james Maguire
Address: 11 Beacon Close Uxbridge Middlesex

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This area should be open to the public at all times and not restricted by being used by a private venture.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Scott Hayward
Address: 8 Ivyhouse Rd Uxbridge

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Traffic or Highways

Comment:It should be open to all

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.
Case Officer: Samuel James

Customer Details

Name: Miss Sarah Bruton
Address: 3 Brackley Close Aston Clinton Aylesbury

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The walk way should be open to the public to freely pass

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.
Case Officer: Samuel James

Customer Details

Name: Mr Daniel Burke
Address: Bloemfontein road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This area should be remain open to the public at all times and not restricted.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Damian Finnegan
Address: 22 Derwent Close Watford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:This is not good for friends who live there. They don't want a restaurant in there back garden. Noise & cooking smells would be atrocious and an eyesore for the area. This cannot go ahead

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.
Case Officer: Samuel James

Customer Details

Name: Ms Troo Heath-Crew
Address: Flat 154 Sugar Quay 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:We have been residents of SQ since 2020 and have always known of the restaurant option on the ground floor. However this new proposal to convert the public jetty into a majorly private dining terrace gives rise to some serious concerns:
1. Our apartment faces east with our terrace overlooking the internal quadrangle with an 'opening' to the Thames. This opening (where the restaurant door will be) creates a kind of acoustic cone so noise from the party boats for example is massively amplified. We have to raise our voices to be heard when the terrace doors are even ajar. Clattering trolleys with crockery & glassware 12 hours a day is a horrifying prospect.
2. Much is made of the buildings' Comfort Cooling (not air conditioning) & MVHR systems in the application. In practice however, their functionality is limited at best, and we should not be forced to close our terrace doors (the only means of acquiring fresh air as no windows open) & live in a hermetically sealed unit so as to shut out the noise & disturbance.
3. Retaining the jetty for public use was a stipulation in the original planning when the development of SQ was approved. This change of use to severely limit public access contravenes this, taking a public amenity away for commercial gain.
4. The selective data provided in the various 'reports' suggests that typically 20 people use the jetty at any given time. We wholly dispute this. It is contrary to our lived experience when we typically see numbers in excess of 40 people on the jetty during dry days & in excess of 80 during warm days at any given time.

5. The jetty is very exposed to the elements, and strong winds gust along the river. There has been no mention of sunshades to protect diners from the strong sun, nor how other furniture will be secured, and items such as glasses and napkins not strewn around. This impacts residents & the public alike.
6. Many more objections incl security (garage/side entrance) but limited space for comments doesn't allow

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.
Case Officer: Samuel James

Customer Details

Name: Mr Gokhan Saygi
Address: 1 waterlane SugarQuay apt 121 London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:
Sugar Quay Jetty is a public open space, with free access through out the year.It is utilized by residents, tourists, schoolchildren, students local workers etc.
It has a free view to iconic landmarks as the Tower Bridge, HMS Belfast, the Shard etc and it is a safe, non commercial place for public use as photography, people exercising or just enjoying neighborhood. Sugar Quay Leaseholders have been paying the cost of Jetty for years which includes Port London Authority, Licence, Lighting, Insurance, Housekeeping, Firtport management & fees. These costs & fees are included in our 999 year leaseholders agreement.
We purchased the SugarQuay apt for a peaceful retirement life in London away from all kinds of pollution (noise, car, smoke and smell)..
The Jetty is the only open space available to the Sugar Quay residents. Any commercial use would limit public access and add a lot of noise, litter, smell as well as other disturbances to this beautiful addition to the Thames area.I strongly object to the above planning permission.
Best regards

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.
Case Officer: Samuel James

Customer Details

Name: Mr Peter Egner
Address: 111 New Crane Wharf 11 New Crane Place London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity

Comment:Loss of public amenity

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.
Case Officer: Samuel James

Customer Details

Name: Miss liana zhao
Address: flat 144 sugar quay london

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:i hate human around me including denial of public access.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Julian Keller
Address: Flat 104, 1 Water Lane Sugar Quay London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:Against the privatization of the jetty. The public and especially residents of the building should be to use it without restrictions.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Iain Reitze
Address: Flat 157 Sugar Quay London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:As a resident of Sugar Quay I very strongly object to this outdoor seating application for numerous reasons.

This is a lovely, quiet area on the river away from The City, as a resident it feels like our village green.

It is enjoyed by many many tourists watching the river and and the bridges.

Having a large seated restaurant will certainly take this away making the area smaller & congested.

It will increase noise levels for residents with people drinking, eating, it will increase the odours into our homes and no doubt increase the chance of vermin because of dropped food.

I would also like to know the impact on marine life with food, drink, cigarettes being dropped through into the water and the smoke travelling into apartments.

The local council and The Port Authority really do have an obligation to look after our riverside and our residents.

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.
Case Officer: Samuel James

Customer Details

Name: Jackie Alexander
Address: 157 Sugar Quay, 1 Water Lane London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:As a resident of Sugar Quay I very strongly object to this outdoor seating application for numerous reasons.
This is a lovely, quiet area on the river. You can easily forget you are in london and we sit on our balcony enjoying the tranquility and peacefulness of the river before us.
There is a constant stream of people and tourists enjoying the stunning views from the pier. We also regularly enjoy walking our dogs around there too..
Having a large seated restaurant will certainly take this away making the area smaller & congested.
It will increase noise levels for residents with people drinking, eating, it will increase the odours into our homes and no doubt increase the chance of vermin because of dropped food.
The constant crossing on the walkway to deliver food and drinks will be restrictive, noisy and will make it very difficult to walk our dogs outside the home where we live.
I would also like to know the impact on marine life with food, drink, cigarettes being dropped through into the water and the smoke travelling into apartments. The issues with drinking and people lingering into the night. Not to mention the increase in litter which is a regular occurrence outside coppa.
We support a restaurant within the building but the area outside should remain a safe and pleasant space for all to enjoy.

The local council and The Port Authority really do have an obligation to look after our riverside and

our residents.

This area should be enjoyed by the many and not just the few who book to eat and drink there.

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.
Case Officer: Samuel James

Customer Details

Name: Miss Jeanette Growney
Address: 80 Tan House Drive Wigan

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:This would spoil a lovely area there is already a restaurant 2 mins walk away at Copa so I don't see the need for this to be built

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.
Case Officer: Samuel James

Customer Details

Name: Lord Jeff Williams
Address: 7 Weybourne Drive Wigan

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I am a frequent visitor to this area of London, I have friends who live in the apartments above the proposed area to be changed into a restaurant. This area should remain 'an open public access area' as the noise, smells and general disturbance will massively affect the residents who live above, if a restaurant was to open there.

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.
Case Officer: Samuel James

Customer Details

Name: Mrs Julie Williams
Address: 7 Weybourne Drive Goose Green Wigan

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Having spent a significant amount of time visiting friends living in Sugar Quay I feel that the planned takeover of The jetty is unnecessary and will actually spoil the entire vibe of the waterfront and will certainly cause disruption to the residences.
Noise, food smells and litter would not be acceptable and given its proximity to a major London landmark (the Tower) with its ample eateries and bars is an unnecessary addition.
Please bear this in mind when making your decision.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Jason Robins
Address: Monks Hall, Parsonage Farm, Abridge Road Theydon Bois

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:Our friends have a luxury apartment overlooking the jetty. The smells and noises emanating from the "private" food venture coupled with the noise from the external air conditioning would be unacceptable to them.

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.
Case Officer: Samuel James

Customer Details

Name: Mrs Susan Catterall
Address: 64 Almond Green Avenue Standish Wigan

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:Too many restaurants in area already. Increase in noise and smells will detract from a pleasant pedestrianised thoroughfare.

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.
Case Officer: Samuel James

Customer Details

Name: Mr John Catterall
Address: 64 Almond Green Avenue Wigan

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity

Comment:With open spaces such a limited commodity these days, such a beautiful area as Sugar Quay should be
kept as such. Eating establishments are already in place, there is no requirement to further extend this restaurant other than pure greed.

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.
Case Officer: Samuel James

Customer Details

Name: Danielle Pointing
Address: 58 Heronway Brentwood

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Another unnecessary establishment. I used to live next door and the noise from party boats was bad enough. This will be highly disruptive, noisy, smelly and likely unsightly amongst an area of history.

RIVER RESIDENTS GROUP

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

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

Samuel.James@cityoflondon.gov.uk; plncomments@cityoflondon.gov.uk

December 28 2024, modified January 14 2024

Dear Sirs,

THE RIVER RESIDENTS GROUP

The River Residents Group (RRG) is made up of people who live, work and travel on or by the Thames and/or are concerned with its conservancy The RRG is unincorporated, self-funding and run by a volunteer steering group guided by our constitution. We publish regular newsletters. Working with communities in six riparian boroughs, we respond to Planning and Licensing applications on the Thames, working with riparian Environmental Health, Licensing and Planning officers and the London Port Health Authority (LPHA), arranging public and virtual meetings. We liaise with councillors and MPs to raise the concerns of our communities. We have developed a Google Tool to document and analyse excessive noise from vessels, recording 2600 incidents in the last three years.

OUR OBJECTION TO 24/01196/FULL: A SUMMARY

We object to this application on the grounds that it will cause Significant Observed Adverse Effect on the residents of 164 adjacent apartments, who will suffer their quality of life diminished due to a major change in the acoustic character of their area as well as the loss of amenity space that has contributed to their health and well-being for years.

The applicants have commissioned an acoustic report that quotes national and local policy on noise nuisance – but have failed to offer actual design mitigations – such as a roof – or any workable, enforceable conditions to protect residential amenity. The applicants' case is that double glazing and air-conditioning in adjacent apartments mean that any noise nuisance will be inflicted **by the residents choice** – if they choose to open their windows. We contend that, as the Agent of Change, it is not for the applicants to dictate that longstanding residents may no longer be allowed fresh air

except in exchange for the noise of 169 drinkers, bottling and servicing under their homes fourteen hours a day, seven days a week.

We also lament the colonisation, commercialisation and narrowing of a very large area that is currently offered as public space on one of the busiest stretches[1] of the Thameside walkway – for a scheme that will create private profit at the cost of loss of amenity to residents and non-paying visitors alike.

In all the foregoing, this scheme fails to comply with national or local Planning policy.

In detail:

DISINGENUOUS APPLICATION WORDING

The D & A characterises this as "sui generis restaurant/bar". That is not an entity under the new planning classifications established under the 2020 Business and Planning Act. While restaurants (former A3) are now Class E, former class A4 drinking establishments such as a public houses, wine bar or other drinking establishments are now classified as 'sui generis' which means they are a use beyond classification and do not benefit from any permitted development right to move to any other use. "Sui generis" in this case signals a bar, not a restaurant. The designs do not feature a kitchen: they appear to demonstrate that this is just a bar, maybe with cold or microwaved bar snacks. There is just "storage" and a "Services area".

And what exactly do the italicised words mean here: "The Jetty would be use as a sui generis restaurant/bar seating area ***serving the existing A3/A4 uses of Ground Floor retail unit of Sugar Quay***"?

How does that assertion work in conjunction with the words, "*The staff will be serving tables from the Services area provided in the jetty which will store food and drinks*"? This appears to state that the proposed new bar is self-contained and **not** "serving" the existing uses in Sugar Quay. It is an entirely new bar area: **there will be no need for the drinkers to proceed to take a meal with food inside the building.**

If the applicants are going to insist that this is not just a bar, and that food is being cooked inside Sugar Quay, then hot food is going to be shuttled across what is left of

[1] According to The City of London's RIVERSIDE WALK ENHANCEMENT STRATEGY 2014

the reduced footway? How would that work in terms of public safety? See below for our concerns about the open space colonisation.

Clarification is required: would the patrons use this bar without taking a meal inside Sugar Quay? The very blurring of the terminology might be seen to suggest that this may well be the intention.

If the plan is in fact to set up a large bar of "sui generis", that usage would affect the kind of conditions – as well as design mitigations – that would need to be added to any consented scheme.

PUBLIC NUISANCE

This is an enormous bar – 436m2 with 169 covers proposed in the Operational Management Plan.

Interestingly, the heavily illustrated D & A avoids showing any representation of the bar with people in it.

A seating plan is merely 'indicative' meaning that vertical drinking is not ruled out.

People who drink without eating make more noise. The river transmits noise very efficiently in all directions. Above the proposed premises are multiple residents and opposite the proposed premises lies the London Bridge Hospital, which has rooms for patients on the river.

While the Noise Impact Report suggests no external amplified music, we see nothing of this specified in the D & A. No noise mitigations are proposed in the D & A. No design mitigations are proposed to stop the principle escape of loud human voice noise – no roof.

The 'Template OMP" – which should offer binding measures to mitigate noise management and dispersal – basically limits those undertakings to a sign asking people to leave quietly. It does not take on board most of the extremely detailed suggestions of the applicants' own Noise Impact Report.

Apart from the noise of 169 drinkers, plus their comings and goings, it appears from the OMP that the noisiest process – moving of bottles (across the footpath) – will be happening at night up till 10pm. Up to 169 drinkers, how many sittings? – this is going to be a significant migration of bottles. What of the bottles being dumped all through the

day into waste areas? The residents are being asked to put up with a large noisy bar and a continuous bottling operation for fourteen hours a day, seven days a week. The reason that no serious mitigation has been offered is because it is impossible and the problem with this application is exemplified here: the size of this enterprise is exaggerated beyond what is reasonable for a site with residents upstairs and a hospital nearby.

The proposed hours are not late. But this is deceptive. Doubtless, the applicants will seek an off sales licence. As they recommend their project for exemplary public seating by the river, the drinkers will simply prolong their nights' consumption at the places conveniently provided, and then those drinkers will be the problem not of the applicants, who have sold them the liquor, but of the residents and the hospital.

While we understand that acousticians work with templates, we would request that they update them when new policy documents are implemented. This Noise Impact Assessment quotes outdated version of the NPPF and London Plan.

The proposed plans do not conform with the London Plan (2021) **Policy D13 Agent of Change.** The Agent of Change principle places the responsibility for mitigating impacts on the entity that is proposing a change.

> *C New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.*
>
> *D Development proposals should manage noise and other potential nuisances by:*
>
> *1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area*
>
> *2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations*
>
> *3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.*

E Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed

The City Plan 2040 endorses this policy:

"4.5.2 *The 'Agent of Change' principle makes developers responsible for addressing at the design stage the environmental and other impacts of development on existing neighbouring occupiers. Applicants for development near to existing residential properties should identify potential impacts on residential amenity and set out measures to mitigate those impacts within their Design and Access Statements or other supporting application documents."*

City Plan 2040 Strategic Policy S3: Housing states

"*The City Corporation will protect existing housing and amenity … by …* 4. *Ensuring that other new land uses within identified residential areas are compatible with residential amenity."*

By this reasoning, the Committee should not permit a bar without a roof or concrete enforceable conditions embodied ideally in a credible OMP.

The Noise Impact Assessment refers to the City of London Plan 2015 rather than the upcoming City Plan 2040. But the latest plan notes that more residents will be populating the City in the future, and preserves the same rights of residents, providing that planners should resist schemes which would cause undue noise likely to generate disturbance to residents; also requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact as well as managing the impact of tourist attractions in the area to minimise disturbance to workers and residents and reducing residential exposure to air and noise pollution.

City Plan 2040 3.13.0 notes

"*The City increasingly operates on a seven day a week basis, with an increase in evening and night-time uses. This will result in an increase in pedestrian movements within the City as patrons enter and exit public houses, bars, night-clubs and restaurants. Anti-social behaviour, including noise, disturbance and odours arising from the operation of the premises can be disruptive to City*



residents and occupiers and proposals should seek to mitigate any negative impacts that may arise, incorporating the Agent of Change principle."

This section of Plan notes that servicing can cause significant noise, as can departing patrons. No concrete or workable or substantial mitigations are proposed in this application.

This application offers none of the above.

In fact, the Noise Impact Assessment states complacently that Sugar Quay has high quality double glazing and air-conditioning so this proposal will not be a problem as the residents can breathe without opening their windows. The applicants draw the quite astonishing conclusion that if this huge bar causes noise to residents, ***it will be by the residents' choice*:**

(4.19) "*Notwithstanding this, apartments have openable windows to balconies that are openable at user choice and/or to assist with ventilative night-time cooling of the properties (with an obvious corollary that openable windows will give rise to increased noise intrusion, but such noise increased ingress is allowed by user choice*)."

The Noise Impact team proposes a whole list of management offers which, troublingly, do not appear in the OMP. Perhaps this is because these measures are largely utterly unenforceable. When you have 169 customers at capacity, no one is going to be able to enact, supervise or ensure such finessing as "*used glass bottles to be placed carefully in recycling bins*" or "*Stock to be unloaded carefully using good lifting techniques to avoid impact type noises from dropping items*". Also, we note "*Stock to be transferred between the jetty and restaurant using plastic contained / trolleys*" – when it is noisy wheels grinding over hard services that causes noise rather than food, which tends to be silent.

The long list of dream-scenario provisions are also at odds with the OMP which says that all the bottles will be moved at the end of service. This Noise Impact Assessment provides for, "*Avoiding the transfer of recyclable waste (e.g. bottles) during the later evening period*".

In fact, these unrealistic, contradictory and unenforceable suggestions – and their absence from the OMP – gravely undermine a report that is based on them.

The elephant in the room here is that there is no design measure taken to mitigate noise … i.e. adding acoustically effective roofing or walls. Of course that would cost money, but it is the only way to make sure that this development would confirm with NPPF and local planning policy.

The importance of preserving and protecting open air spaces for City residents is stressed in the City Plan 2040, with a special mention given to the riverside:

> "3.1.6 3.1.7 *Outdoor spaces and the public realm provide places for relaxation, amenity and leisure. The location and nature of the City means that perceptions of tranquillity and quieter areas are often based on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels. The City Corporation's Noise Strategy 2016-2026 supports the creation of tranquil areas in the City and* ***promotes awareness of the importance of protecting and enhancing these locations where possible. Examples of quieter areas in the City are open spaces, parts of the Riverside Walk,*** *churchyards and housing estates. Research on traffic noise has found that* ***long-term exposure to noise above a certain level can have negative impacts on physical and mental health. It is therefore important to protect the relative tranquillity of some of the City's open spaces to confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels, and assisting in the restoration and recovery from sensory overload****."*[2]

1. Apart from costing them peace, this application may also cost the residents money. We wish to draw the Committee's attention to a difficult potential consequence of consenting this scheme. The Jetty is subject to a River Works Licence (RWL) of 2014 (with a variation in 2019) with fees paid annually to the Port of London Authority (PLA). We understand that the residents are obliged to contribute to those fees. If the Jetty is commercialised as a bar, the PLA is likely to require a revised RWL with added fees. This means that the City's tax-paying residents would likely have to pay more for the very River Works Licence that would mean they may not be able to open their windows or use their balconies fourteen hours a day, seven days a week and would also be deprived of their valued (and paid for) private amenity space.

[2] The words in bold are selected by me

The 2014 RWL contains a clause prohibiting nuisance: 14. "*Not to do or allow to remain upon in under or at the Works anything which may constitute a nuisance or which may cause damage or inconvenience to the PLA or anyone on the Thames or to the riverbed or anything in or on the river and not use the Works for any illegal or immoral purpose*." Setting up a bar in this space seems very likely to violate this provision against nuisance. However, the PLA does not take responsibility for noise pollution[3], so the duty of care rests with the City of London in this case, and this has been reinforced in our correspondence with the PLA. In an email on January 9 2025, James Trimmer of the PLA stated, '*Whilst there's a general condition on nuisance (Sect 3, Para 14), as you know CoLC is EHO for the purposes of noise and would principally enforce around this area*.'

The PLA also confirmed to us 9.1.25[4] that a new RWL would be required for this current application: "*There will need to be a new RWL granted as there has been a change of ownership, notwithstanding any potential change of use*". James Trimmer at the PLA was also kind enough to supply (redacted) copies of the two RWLs currently in place for the jetty, one from 24 April 2014 and the other a variation from 16 August 2019. The variation provides for the landscaping, decking and benching of the 'private area', with a private entrance (interestingly entitled "the Ecological works" … but it also specifies that the landscaped area may be used for nothing other than private amenity space for the residents:

[3] At West India Pier, the residents protested the granting of a River Works Licence to the *Oceandiva* consortium, which wanted to set up a charging and servicing station in front of their homes. The PLA allowed the 750 residents affected only a "non-statutory consultation" and limited comments
to navigation and flora, fauna, historic sites as per Section 48A of the Harbours Act 1964.

[4] Email from James Trimmer, PLA, to Michelle Lovric

1.3.2 the addition of a new paragraph 13.3:

"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.

13.4 not to use the area of the Jetty reserved for public use other than as public amenity space and not to hold any events or private parties within this area.

Clearly this application betrays the intention of this RWL by commercializing the space and depriving the residents of their amenity space, (whether public or private).

We note also a paragraph about the Highways implication in the 2014 RWL. It would appear that there is work to be done on this issue to satisfy the PLA's RWL requirements and that the applicants' attested intention to keep the southern riverside area as part of the Public Highway may be in contravention of their RWL unless conditioned appropriately?

Highway and Walkway

25. Not to allow any walkway created on the Works to be dedicated as a highway under the provisions of the Highways Act 1980 nor agree to it being declared a walkway under the provisions of the Greater London Council (General Powers) Act 1969 without a prior agreement being entered into between the walkway authority the Commissioners and the PLA covering removal of the walkway on revocation or termination of this Licence and indemnification of the Commissioners and the PLA against future maintenance repair provision of support and replacement of the walkway and other claims arising from the existence state or use of the walkway and to ensure that upon termination of this Licence any rights to use the walkway terminate."

COLONISATION OF RIVERSIDE OPEN SPACE FOR NEGATIVELY IMPACTFUL PRIVATE PROFIT

The RRG is uneasy about any privatisation and colonisation of precious riverside outdoor space. We need more public places, not fewer. The riverside walk at this site is already congested with walkers, especially during the summer.

Yes, a sliver of footpath remains on either side of the bar, but the area accessible to the non-drinking/non-paying public is seriously diminished. This creates a precedent that worries us. We've already seen what happened at nearby Coppa: there's a permanent bottleneck there since Coppa's owners were permitted to extend the dining area.

The London Plan resists any attempt to diminish access to healthy streets and walkable areas.

The City Plan 2040 states

> *12.1.0 12.1.1 The City is densely built up and most of its open space provision consists of small spaces at street level. Open spaces are vital to the City, offering residents, workers and visitors outside spaces in which to spend time, relax, and encounter nature, and play a crucial role in providing opportunities for play, exercise and recreation, and social interaction. Open spaces are also inclusive, providing free access for everyone. They are important havens for wildlife and enrich the City's biodiversity, and help to mitigate the effects of climate change, improve air quality and benefit wellbeing, and physical and mental health.*

It also recommends (Strategic Policy S17: Thames Policy Area)

> *d. refusing development on or over the River Thames, except for structures that specifically require a waterside location for river related uses;*

A private bar is not a river-related use.

The same policy asserts that any riverside terraces only in places where "*they do not impact adversely on protected views, the amenity of occupiers or nearby residents"*

It also provides for

a. protecting and enhancing permanent public access and river views along the Riverside Walk;

b. improving access to the River Thames by enhancing north-south routes and the widening of the Riverside Walk;

c. maximising opportunities for public open space along the riverfront and seeking public realm improvements and increased permeability to the north of the Riverside Walk;

This scheme reduces the public walkway, making it less permeable and blocking views – it does everything that the City Plan 2040 seeks to resist.

The City of London's RIVERSIDE WALK ENHANCEMENT STRATEGY 2014 listed Sugar Quay as one of its high priority projects to "*Open up private walkway to allow public access*". The project was that the "*existing walkway will be widened and enhanced … There is an aspiration to make this area publically* [sic] *accessible as an additional public space along the Riverside*." [5]That has been achieved. Why should it now be reversed or diminished?

It is not just residents who will suffer a reduced amenity as a result of this scheme. Visitors, those taking exercise, commuters – will all suffer reduced access to the riverside pathway. The RIVERSIDE WALK ENHANCEMENT STRATEGY noted that this area had heavy traffic: "*London Bridge was the main point of entry with the heaviest flow of people heading east towards Custom House/Sugar Quay*."[6] Section 5.6 on Current and Future Movement notes that the walk is used by local works, residents, children, joggers, tourists, families, those heading to places of food and entertainment. It notices that "*significant*" numbers of joggers are using the path. It lists one of the constraints of the Riverside Walk as "*Not enough green spaces or places to rest / play*".

Should this scheme be consented, the remaining northern sliver of public walkway at Sugar Quay will, it seems, be compromised by heavy traffic of trolleys, waiters, hot food (perhaps), drinkers going to and returning from the toilets inside cutting across those who wish to proceed along the walkway: the D & A states, "*The kitchen, toilets and staff areas are located inside the restaurant, in the Ground Floor retail unit of Sugar Quay, with existing consented A3/A4 uses*." So it is disingenuous to claim that the northern

[5]8.3.2.10 Sugar Quay and Sugar Quay Jetty
[6] 6.1 Assessment of users of the Riverside Walk

part of the walkway is actually retained for public use – unless the riverside bar is run completely as a self-contained bar with no real or substantial food.

As for the riverside section of open space – the new public seating (which take up several pages of the D & A) do not take into account how people will stick out their legs, place their bags, gather in groups facing the benches for socializing, further reducing the space for access.

PUBLIC SAFETY

We note that a structural test on the Jetty was conducted by Beckett Rankine in 2015/16[7]. They appointed Swantest to undertake load testing. Swantest advised that the required loading was defined as 5kN/m2 which will allow for pedestrian access only loading on the jetty. But what workings exist to show that

a. The jetty structure can support the weight all the bars, table, chairs, umbrellas, planters and benches proposed?
b. The jetty structure can also support 169 people plus staff in the bar PLUS those walking on the remaining public realm either side?

CONCLUSION

This scheme does not comply with the national and local policy for residential amenity and permeable public spaces, particularly on the Thames riverfront. It contains insufficient mitigations to avoid public nuisance.

We urge the applicants to come up with design mitigations and a set of workable enforceable Planning Conditions that would allow residents to open their windows – and to discuss them with the residents affected by their plans.

Failing that, we urge the Committee to reject this application.

Finally, on the subject of resident amenity and public nuisance, we note the timing of this application, at Christmas, when many people are away or otherwise occupied and have not had an opportunity to see any notices. Had the application become visible at a

[7]Notes of Planning and Transportation Committee, January 12 2016 re Sugar Quay, Lower Thames Street, London EC3R 6EA Public use of the Sugar Quay jetty. Related to an application under Section 73 to make minor material amendments to planning permission dated 16th September 2013 (12/01104/FULMAJ) including lowering of the first floor soffit level and repositioning of the two north cores, rationalisation of restaurant deliveries and refuse collection, facade and landscaping improvements, changes to the internal configuration of residential units and associated works.

different time, there would doubtless have been more objections from those who would be affected by the granting of this application.

A petition against the scheme has, at the time of writing, gained nearly 700 signatures. The petition is not, of course, Planning currency, but it is indicative of the public dissatisfaction with yet another piece of open space lost to the public and instead grabbed for private profit generated in a way that will impact negatively on City residents, workers and visitors alike.

Yours sincerely

Michelle Lovric, Vice-Chair, RRG

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

Our Ref: dd/lb/Sugar Quay

Your Ref:

18th January 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 Application no: 24/01196/FULL

We write with reference to the above 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.

The proposed use will cause a substantial interference with the residents' ordinary use and enjoyment of their existing homes and external spaces, including their balconies, and will cause visual intrusion, and therefore result in a public and/or statutory nuisance and/or a significant adverse impact on residents.

The question the planning authority ought to ask is whether the applicants' use of land will cause a substantial noise change and interference with the ordinary use of the residents' homes[1].

The outdoor use of this proposed licensed premises will involve noise from a large number of people, amplified music, and the carrying on of various activities including eating, drinking and smoking, which will necessitate the ingress and egress of many hundreds of people. These activities will lead to the transfer of substantial sound and cause a public nuisance (internal and external noise), a loss of residential amenity, and is likely to lead to anti-social behaviour.

[1] Fearn and others v Board of Trustees of the Tate Gallery, [2023] UKSC 4, 2023 WL 01424017.

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.

The LEGAL 500 UNITED KINGDOM LEADING FIRM

We believe by the standard of an ordinary or average person that the proposed activities would cause them substantial adverse harm, and there is no rule that such a nuisance can be committed simply because an area can sometimes be busy with people walking past or gathering nearby at various times of the day, week, or month.[2] The proposed activities will be a permanent change to the residential area and public walk ways.

The principle of "live and let live" Fearn, ¶¶28, 37, 71. The Applicants will say, there is no nuisance committed where acts are necessary for the common and ordinary use and occupation of land. We say, there is no defence in, however, of making reasonable use of one's land (Fearn, ¶29, ¶¶54-56).

We understand in previous applications and leases, the city planners and developers had due consideration to future occupiers and residents of Sugar Quay, 1 Water Lane, EC3R 6AJ, and imposed the following noise criteria in relation to the Ground Floor Commercial Unit and this formed part of the tenant's agreement for lease.

> "1 Ensure noise levels emanating from the demised premises measured at the external façade of the nearest residential unit to the demised premises do not exceed 45 dB LAeq,15minutes by reference to the code of practise of sound insulation and noise reduction in buildings BS 8233 and in case of noise emanating from any fixed or mobile plant used in or in connection with demised premises ensure it does not exceed 10 dBA below background noise levels measured at the same point of the aforesaid." And
>
> "2 Activity noise, either airborne or structure-borne, from any commercial unit must not exceed the following NR criteria in any adjacent residential unit: NR20 L1 – daytime (07:00 – 23:00 hours)

The above conditions are consistent with The City Corporation's Noise Strategy, which seeks to protect residents from public nuisance from licensed premises, through the planning and decision making process. The proposed use does not comply with the aforementioned conditions, therefore is contrary to planning policy.

We are aware of the city's policy about good acoustic design, which places constraints on activities and limits on hours of operation, to overcome the nuisance and loss of amenity. However, having read the report provided by the applicant, we are concerned that they have created an artificially low acoustically ambient noise level and have used Australasian standards of modelling noise outcomes rather than ISO 3382-3:2012. Notwithstanding the aforementioned, we do not believe that any

[2] Ibid, Fearn, ¶¶ 38-41

constraints on the proposed activities could overcome the substantial noise harm and loss of residential amenity.

The residents have therefore sought to instruct their own expert to undertake a noise assessment and report to them accordingly; we ask the planning department to consider this report and its finding.

The residents' expert report concludes that the proposal to change of use to a 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 will lead to substantial noise change, harm and lead to a 'Significant Adverse Impact' to the existing residential amenity.

It is respectfully submitted, that the proposals should therefore not be considered acceptable on the grounds of noise nuisance and the loss of residential amenity, given the close proximity of the proposal to the residents' homes.

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

Yours faithfully

[redacted]

David Dadds, Barrister
Solicitor-Advocate
DADDS LLP

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

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.
Case Officer: Samuel James

Customer Details

Name: Mr Francisco Baeza
Address: 125 Buckler Court London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Residential Amenity

Comment:We ask the planning authority to resist this application for a change of use in this public area that we use every weekend to enjoy the outdoors next to such iconic spaces. We also work in the area and found ourselves often enjoying our lunch breaks in this public space. It would be shameful to loose such an opportunity to enjoy such a privileged public space and constrain it to a mere walkway. There are already so many commercial outlets around the river side, that we do not think there is any more need.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Paul Snow
Address: 54 Englefield Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity

Comment:Please ensure that access to the jetty by the general public is not limited if this application is granted.

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.
Case Officer: Samuel James

Customer Details

Name: Mr David Linnell
Address: 20 Eleven Acre Rise Loughton

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:Sugar Quay Jetty is a public open space, with free access through out the year. It is used by residents and visitors.

I gather that Sugar Quay Leaseholders have been paying the cost of the Jetty for years (including the Port London Authority Licence, lighting, insurance etc) through their leaseholder agreements

Any commercial use would limit public access and add a lot of noise, litter, smell as well as other disturbances to this rare open space.

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.
Case Officer: Samuel James

Customer Details

Name: Mrs Alicia Williams
Address: 23 crofts street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity

Comment:I am writing to formally object to the proposed privatization of a public walkway for the benefit of a restaurant. This walkway is not just a path-it is an essential part of the Wapping community, providing residents and visitors with a valuable space to walk, exercise, and enjoy the riverfront.

Public access to the Thames is already being eroded, with several areas along the river having been privatized for commercial gain. Each of these losses diminishes the accessibility of the riverfront for the public, gradually turning what should be a shared community resource into exclusive spaces for private profit. Small public areas like this are vital to preserving the character and accessibility of Wapping, and once they are lost, they are rarely regained. The walkway in question serves multiple purposes beyond leisure. It is used daily by joggers, walkers, families, and those seeking a moment of peace by the water. It enhances the well-being of residents and fosters a sense of community by providing an open, shared space that is not tied to commercial interests. The Thames Path and its accessibility should be protected, not sold off piece by piece to businesses looking to expand their footprint.

If this privatization is approved, it sets a dangerous precedent for further restrictions on public land. The interests of local residents and the wider community must be prioritized over the commercial ambitions of a single business. Public spaces should remain public, ensuring that everyone-regardless of their financial means-can continue to enjoy the benefits of Wapping's historic and scenic riverfront.

I urge you to reject this application and preserve this walkway for the community.

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.
Case Officer: Samuel James

Customer Details

Name: Mr Roger Mchardy
Address: 2 Elder Oak Close London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Areas like this, freely accessible to the general public should be retained as such. Access should not be restricted so businesses can make money from them.

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.
Case Officer: Samuel James

Customer Details

Name: Miss Victoria Jenkins
Address: 69 Salisbury Road Moseley Birmingham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:To keep the local community "on side", and thereby minimise anti-social behaviour, it would be wise to foster a sense of community. When a space is "OURS" as opposed to "YOURS, and not for the enjoyment of us", there is a sense of ownership and wanting not to deface it. If this space is no longer "OURS", why would locals take good care of it. I recommend that the restaurant works with the community to see the jetty as a shared amenity. It could go even further and involve the community in its "offer" to the restaurant's patrons - perhaps by getting local children to display their art work in the retail areas and by using their art work in the signage on the jetty. That way you would get whole families committing to the conservation principles that we should all be working towards.

This page is intentionally left blank