



## Planning Applications Sub-Committee

**Date:** TUESDAY, 6 MAY 2025

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

**Venue:** OLD LIBRARY - GUILDHALL

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

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**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. **MINUTES OF THE MEETING HELD ON 31 JANUARY 2025**

To agree the public minutes of the Planning Applications Sub-Committee meeting held on 31 January 2025.

**For Decision**  
(Pages 5 - 26)

4. **MINUTES OF THE MEETING HELD ON 11 FEBRUARY 2025**

To agree the public minutes of the Planning Applications Sub-Committee meeting held on 11 February 2025.

**For Decision**  
(Pages 27 - 58)

5. **MONTCALM BREWERY**

Report of the Director of Planning & Development.

**For Decision**  
(Pages 59 - 308)

6. **\*VALID PLANNING APPLICATIONS RECEIVED BY ENVIRONMENT DEPARTMENT**

Report of the Chief Planning Officer & Development Director.

**For Information**

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

Report of the Chief Planning Officer & Development Director.

**For Information**

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

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



## PLANNING APPLICATIONS SUB-COMMITTEE

Friday, 31 January 2025

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Friday, 31 January 2025 at 10.30 am

### Present

#### Members:

Deputy Shravan Joshi MBE (Chairman)  
Graham Packham (Deputy Chairman)  
Deputy Randall Anderson  
Ian Bishop-Laggett  
Mary Durcan  
Deputy John Edwards  
Anthony David Fitzpatrick  
Deputy Marianne Fredericks  
Jaspreet Hodgson  
Amy Horscroft  
Deputy Brian Mooney BEM  
Deputy Alastair Moss  
Deborah Oliver  
Judith Pleasance  
Deputy Henry Pollard  
Hugh Selka  
William Upton KC  
Jacqui Webster  
Deputy Dawn Wright

#### Officers:

Baljit Bhandal	- Comptroller and City Solicitor's Department
Kerstin Kane	- Environment Department
Rob McNicol	- Environment Department
Gwyn Richards	- Environment Department
Amy Williams	- Environment Department
Polly Dunn	- Town Clerk's Department
Callum Southern	- Town Clerk's Department

### 1. APOLOGIES

Apologies were received by Deputy John Fletcher, Alderman Robert Hughes-Penney, Alderwoman Elizabeth Anne King BEM JP, Antony Manchester, Eamonn Mullally, Alderman Simon Pryke, Ian Seaton and Tom Sleigh.

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

The Deputy Chairman declared a non-pecuniary interest as a Friend of St. Paul's Cathedral.

3. **MINUTES OF THE MEETING HELD ON 6 DECEMBER 2024**

**RESOLVED** – That, the public minutes of the meeting held on 6 December 2024 be agreed as a correct record.

4. **MINUTES OF THE MEETING HELD ON 13 DECEMBER 2024**

A Member raised an issue in relation to the dating of the City of London Corporation's adoption of the international definition of anti-Semitism referred to on Page 52 and sought clarification over whether the date was correct or whether the speaker had misspoken. The Clerk confirmed he would clarify that.

**RESOLVED** – That, the public minutes of the meeting held on 13 December 2024 be agreed as a correct record, subject to clarification of point raised by Member.

5. **99 BISHOPSGATE**

The Sub-Committee received a report which sought planning permission for the partial demolition of the existing building, retention and partial extension of an existing basement and construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E) with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5- storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

The Chairman invited Officers to make a presentation to the Sub-Committee.

Officers presented the site location plan to the Sub-Committee and noted the site was on the junction of Bishopsgate and Wormwood Street which was an important nodal point at the gateway to the City Cluster from Liverpool Street.

Officers recapped with a presentation of the existing building from an aerial view from the north and stated that the building itself dated from 1976 which had been heavily re-clad following bomb damage in 1993 and was unremarkable in its appearance. Officers also showed an image, for context, of the Eastern Cluster from an aerial view which highlighted the gateway location.

Officers told the Sub-Committee that the site was not a designated heritage asset and did not lie in a Conservation Area, but noted that the St. Helen's

Place Conservation Area was a short distance to the east and did contain the Grade I-listed St. Ethelberga Centre for Reconciliation and Peace. Officers added that the Bishopsgate Conservation Area sat to the north of the site and contained the Grade I-listed St. Botolph Bishopsgate, as well as the closest residential properties to the development on the north side of Wormwood Street and the new Broad Street Conservation Area was to the northwest of the site which contained the Grade I-listed All Hallows on the Wall. Officers further noted that the site was not affected by any protected viewing corridors, but was part of the City Cluster which was visible in a range of LVMF views from river bridges.

The Sub-Committee was presented with an image which Officers stated highlighted the impermeability of the existing sites as the block formed a formidable barrier between surrounding permeable routes and wider connectivity corridors, including new routes to consented schemes as 55 Old Broad Street, and 55 Bishopsgate to the north and south of the site.

Officers presented photographs and a diagram of the existing building and stated it highlighted the non-descript design of the existing 28-storey tower, the lack of active frontage on the ground plane and noted the image to the right showed the structure of the existing building which was dominated by a rough foundation which accounted for 48% of the existing structure by mass.

A rendered view of the proposed scheme in context was presented to Members with an aerial view from the northwest and Officers told the Sub-Committee that the proposals before it would involve the demolition of the existing building, the retention of the raft piles and foundation and the construction of three new buildings on the site. Officers noted, firstly, that the tower would rise to 54-storeys and would deliver over 99,000m<sup>2</sup> of lettable best-in-class office floor space which would be a significant contribution towards the City's strategic economic objectives. Officers added a standalone pavilion building was also proposed that would rise to 6-storeys, plus plant which would provide 2.400sqm of cultural floor space and a public cycle hub.

Officers presented the ground level public realm plan and stated the proposals would create a new arrival experience for the City Cluster and would massively increase permeability across the site, with the city market at the base of the tower which would provide a unique food and beverage offer for people to arrive in, depart from and move through with ease. Officers added one could also appreciate the new pocket park at the southeast of the site at the junction with 55 Bishopsgate which was created around an existing, and retained, Gingko tree. Officers stated there was a tenfold increase in public space, with the overall space equating to around 80% of the size of Guildhall Yard.

Officers moved on to the layering of the public space across the site and stated that the new public realm and route through the building was created through the pulling back of the building line from the existing to create more generous pavements and significantly improved pedestrian comfort levels.

Officers presented an image of the proposed city market which they stated showed the amount of internally accessible public space available amongst the unique food and beverage offer. Officers added that public toilets, changing spaces and a drinking fountain had been provided. Officers also highlighted the lower floors of the pavilion cultural building which they stated showed the vibrancy and activity of the ground plane. Officers also drew attention to the public cycle hub and stated it included a green roof and a generous new public route through which brought the city walkway route down to the ground to be more inclusive. Officers showed an image of the public space overview to the Sub-Committee.

Officers presented CGIs of the 54-storey tower with views from Bishopsgate Junction and Bishopsgate Approach and stated that the proposal was of extraordinarily high architectural quality, with the tower expertly shaped to respond to townscape considerations, London-wide strategic views and microclimatic conditions. Additionally, the new gateway to the cluster would be of the highest aesthetic quality and heavily greened.

The Sub-Committee were presented with the east and west elevations of the tower proposal by Officers who stated that the height of the tower was just over 240m to commensurate with existing and consented neighbouring buildings, including 55 Bishopsgate and the Heron.

An image of the retention of the existing raft foundation was shown to the Sub-Committee and Officers stated that the existing raw foundations and pylons would be retained, and the building had been designed with excellent sustainability credentials around the retained foundation. This also meant that the basement was exceptionally constrained.

Officers presented the structure proposal and stated that the structure had been meticulously crafted to be as lean and efficient as possible, with an innate aesthetic quality where every element had a purpose, and the DNA of the building's architectural design was expertly designed with a seamless integration of structure and aesthetics.

The townscape consideration and the response to the cluster in key views was discussed by Officers who stated that the key influence on the appearance of the tower was the view from Waterloo Bridge and the massing had been sculpted to respond to the highly important view of St. Paul's Cathedral and to create a coherent new piece in the City Cluster.

Officers presented a diagram of the typical office floor from levels 4 to 53 and stated it would provide extensive office floor space designed to be adaptable and flexible to a range of occupied needs and each level had access to amenity. They further noted that it would be served by an offset primary soft core to maximise the floor plates and a secondary soft core containing fire escapes and W/Cs.

The Sub-Committee heard from Officers that the building offered a range of Grade A best-in-class office environments and would be rich in a variety of

office amenity spaces, including internal and external terrace areas and winter gardens that were heavily greened which would create a building that people wanted to work in, with the greening further softening its appearance.

Officers presented images of the external terrace looking north and south which they stated showed the raking back of the profile of the building to respond to long-range views and added that one could appreciate the sheer scale of the terraces.

The Sub-Committee was shown an image of the public realm from the view of Bishopsgate Junction by Officers who stated the scale of the colonnade would open up the pedestrian experience. Officers also presented images of the public realm seen from Wormwood Street and Bishopsgate which they stated showed the generous arcade from Wormwood Street and the new accessible route through the site. Officers presented more images of the public realm and arcade from Wormwood Street and Bishopsgate which showed one of the raised office entrances visible.

The proposed city market entrance from Wormwood Street was shown to the Sub-Committee and Officers stated that the site had a significant level change of 2.5m and, although there were some minimum steps, the design had worked hard to achieve level access through gentle slopes across the site and every part of the development could be inclusively accessed. Officers also presented another image of the city market within the colonnade which showed spill out seating areas. Officers added that the doors to the market would be open for the majority of the time and the gates would be akin to historic city markets and provided visibility across the ground plain.

Officers presented an image of the pocket park view toward St. Ethelburga's and stated it was the southern core of the tower at the junction with 55 Bishopsgate. They noted that the ground floor of the site had been realigned to create a new vista to St. Ethelburga's, the St. Helen's Conservation Area, and to create a new pocket park around the retained Ginkgo tree. Officers added that the opening up of the ground plain would create a new space around the retained tree and provide greater amenity to pedestrians through the pocket park.

Officers informed the Sub-Committee that the scheme had been extensively tested and designed to minimise microclimatic impacts and noted that objections to the proposals had raised concerns with the wind impact to St. Ethelburga's. However, they stated that, in all scenarios, there would be no additional material harmful impact to neighbouring properties and all areas around St. Ethelburga's would be suitable for their intended uses. Officers added that the proposals would have a beneficial impact on wind conditions to Camomile Street. Officers stated that, overall, the proposal would have acceptable impacts for all other microclimatic results, including daylight and sunlight impacts to surrounding properties.

Officers stated that the concept at the heart of the cultural offer was the idea of 'open gate' which drew inspiration from the site's position on the city wall

adjacent to the ancient Bishops Gate and was designed to welcome all into the city.

An image of the pavilion cultural building was presented to the Sub-Committee by Officers who stated that the six-storey building would be for both cultural production, consumption, and would be wrapped in a veil of the map of London. Officers added the pavilion building would bring vibrancy and activity to an important gateway, and the design outwardly denoted its function and would enrich the fringe of the City Cluster.

Officers presented the schematic layout of the glass gallery on the ground floor and first floor of the cultural building and stated there was free public access to exhibitions curated by the Cultural Anchor tenant and the London Museum, with the first-floor mezzanine being a space for smaller recitals and there was a drop-in space for school groups and a lobby for larger events.

CGIs of the glass gallery entrance were shown to the Sub-Committee by Officers who stated they showed high levels of visibility and activity which reinforced that it was a very public use and a location for art and artefacts for display.

Officers stated that the second and third floor levels of the cultural building included a multi-purpose hall, and the cultural audit had highlighted that a hall which could hold 200 people was what was needed in the city, and it was designed to be fully flexible for a range of events which were either free or affordably ticketed to the public. Officers also presented a CGI of the space and added it showed its generous size.

The Sub-Committee were shown images of the fourth and fifth level of the cultural building by Officers who stated it included the creative studios, with one level for the Cultural Anchor and the other as a flexible creative workspace for office or rehearsal space. Officers added the levels would be offered at affordable rates in line with the City's Small and Medium Enterprise (SME) Strategy.

Officers informed Members that the applicant, throughout the development of Open Gate, had been working in collaboration with Intermission Youth who were the intended operator and Cultural Anchor tenant of the cultural building. Officers added that Intermission Youth were a charity that was set up to help disadvantaged young people through access to theatre and full details would be worked up through a Section 106 agreement.

Cycle hub diagrams were presented to the Sub-Committee by Officers who explained that it was a three-storey building which would house the free short-stay cycle parking which was accessible to the public, with the possibility of cycle repair facilities and a concierge service.

Officers noted that while the three new buildings proposed would stand above ground, they would be serviced by a site-wide basement of which the proposal

provided 1,600 long-stay cycle parking spaces at basement levels which was heavily constrained by the existing raft.

An image of the existing and proposed basement access location was shown to the Sub-Committee by Officers who stated that the existing ramp to the servicing bay from Old Broad Street was to be re-used and the proposed servicing bay with a disabled parking bay was outlined. Officers added that the consolidation strategy meant that the number of daily servicing trips would be reduced from 219 as existed to 96 trips per day in the proposed scheme which would be undertaken overnight.

A diagram and image of the high-level city walkway that ran through the existing site was shown to Members by Officers who explained that the proposal would bring the route down to ground level which would improve its inclusive access and quality.

Officers presented images of the existing and proposed building from the north at Artillery Lane and stated that the building had a convincing presence in the proposed view which befitted its status as the gateway into the cluster with its height and scale commensurate to the existing and consented tall buildings in the cluster. Officers also presented images of the existing and proposed building from further south along the approach viewed north from Liverpool Street and stated that it showed the striking new gateway at an important junction which would come to ground successfully and increase the public realm in both quality and scale.

Officers showed the Sub-Committee images of the existing and proposed building from Gracechurch Street looking north by Officers who stated that the proposed image showed the principal south core and the way it related back to the cluster, but noted, in the cumulative scenario, that it would be obscured by 55 Bishopsgate. Officers also presented the view of the existing, proposed and cumulative development from St. Helen's Place looking south and noted that the cumulative development from that view would also be obscured by 55 Bishopsgate.

The view of the existing and proposed development from the north end of Waterloo Bridge at LVMF 15B.1 was presented to the Sub-Committee by Officers who noted it was the place from which the proposals impacted on the setting of St. Paul's Cathedral was at its greatest. They added that the proposed view showed how the proposal had been sculpted to be clearly and meaningfully deferential to the Cathedral through the significant raking profile at upper levels and the feathered edge from visible greening which, in turn, allowed it to form an elegant end-piece to the City Cluster when seen from the view presented. Officers further noted, nevertheless, that because of the proposal scale and visual proximity to the Cathedral, that Officers have concurred, with Historic England and St. Paul's Cathedral, that there was a degree of harm arising to the setting of the Cathedral in the view presented. Officers added that the cumulative scenario showed how the proposal would consolidate and tidy up the edge of the Cluster.

Officers presented existing, proposed and cumulative views of the Cluster from the middle of Waterloo Bridge and stated that one could see how the proposals would consolidate the cluster at its northern edge which moved away from the Cathedral as one moved south across Waterloo Bridge.

The view of the existing and proposed development from the south end of Waterloo Bridge at LVMF 15B.2 was shown to the Sub-Committee by Officers who stated that the proposed development would not only have a relatively fleeting impact, limited to a particular area of the bridge, but the proposal was over 1km away from the Cathedral and would be perceived as another layer of the City as part of the existing skyline features of the cluster. Officers also presented the cumulative view from LVMF 15B.2.

Officers presented some existing, proposed and cumulative nighttime views of the development from LVMF 15B.2 on Waterloo Bridge and stated that one could see how the lighting would be of the sensitivity and specification commensurate to others in the cluster which ensured that the Cathedral retained its primacy at nighttime and had all been secured by condition.

Views of the existing, proposed and cumulative daytime view of the development from LVMF 17B.1 on Hungerford Bridge were also shown by Officers who explained to the Sub-Committee that one could see the in foreground that the impacts on the proposal were similar. Views of the existing and proposed view of the development from LVMF 17B.2 further south on Hungerford Bridge were also shown to the Sub-Committee by Officers who added that the proposal was seen at a greater distance from the Cathedral visually and was a considerable physical distance away from it. They also presented the cumulative view to Members.

Officers also presented views of the existing and proposed development from LVMF16B.2 at Gabriel's Wharf and stated that St. Paul's Cathedral had additionally raised concerns about the impact of the scheme from the view. However, Officers stated that they had found no adverse impacts on the view would arise from the proposed development. The cumulative view was also shown to the Sub-Committee.

Officers provided an existing, proposed and cumulative view of the development from LVMF 26A.1 in St. James's Park and stated the proposed view had been the focus of objections from Historic England and had concurred in finding a degree of harm to the view.

An existing and proposed view from the Golden Gallery at St. Paul's Cathedral was also presented to the Sub-Committee by Officers who stated it showed the distance of the proposal from the Cathedral and the way it would form a convincing and dynamic northwestern end piece to the City Cluster.

The Sub-Committee was presented with an existing and proposed view of the development from London Wall by Officers who stated that the proposal would form a striking new piece of modern architecture, seen in conjunction with the



historic financial city and, as part of that, the characteristic contrast between ancient and modern, which was what was so special about the Square Mile.

Officers told the Sub-Committee that the building had been strategically sited within the heart of the cluster, which followed a plan-led approach to consolidating tall buildings and growth in a manner which would be the least impactful on strategic heritage assets and which was sustainably located. They continued that the proposal would deliver 8.3% of the required office floor space to meet the key strategic objectives of the adopted and emerging Local Plans which had optimised the capacity of the site and would make a significant contribution to maintaining the City's status as the world's leading financial centre. Officers added that the proposal resulted in a 1000% increase in high quality public realm across the site that would transform the permeability of the site at a critical arrival point in the cluster. They told the Sub-Committee that the City market would offer a significant new arrival experience and departure point to appeal to the City's 600,000 daily workers, visitors and residents and a significant new piece of public amenity at an important nodal location. Officers further added that the tower provided a structural quality which would step down from 55 Bishopsgate to provide a distinct and well-conceived addition to the emerging cluster and the proposal added to the existing rich mix of striking juxtapositions which had come to symbolise the continued success and evolution of the City. Officers also stated that the development was considered to be an exemplary architectural response to a complicated site that had been designed with sustainability, microclimate, streets, people, and spaces in mind, and presented an elegant design solution which made effective use of limited resources, as well as being heavily greened. Officers told the Sub-Committee that the pavilion cultural building would deliver a significant new contribution to the strategic cultural aspirations of the Destination City Initiative by providing free-to-enter multi-purpose events, with the venue being an incubator of creativity in a unique new landmark building with an outwardly facing permeable ecosystem. Officers added that the cycle hub contributed to active travel aspirations and, overall, the scheme provided significantly enhanced permeability which fed into wider aspirations for pedestrian movement. They further noted that the development would provide a unique and distinctive addition to the city cluster which would deliver significant public benefits which flowed from an enhanced public realm and the creation of a cultural attraction. Officers stated that, overall, the scheme would be of the highest architectural calibre and have a rare cohesiveness of structural and architectural finesse, and it reconciled structural microclimatic and function requirements in a solution of rare elegance by a world leading architect which would fit neatly into its local and strategic London-wide context. Officers concluded, that, for those reasons, the scheme would strike a compelling planning balance that would easily outweigh the limited and fleeting harmful impacts identified to the Cathedral and represented a major strategic contribution to the City's economic and cultural agenda. They recommended approval of the development as set out in the report.

The Town Clerk explained the procedure for speakers.

The Chairman invited the Supporters to address the Sub-Committee.

Mr. Scanlon of Brookfield Properties UK addressed the Sub-Committee and stated that Brookfield had a proud track record of investment, development and partnerships in the City having delivered over 3,000,000ft<sup>2</sup> of major office-led schemes in recent years which included developments such as London Wall Place, 100 Bishopsgate and 1 Leadenhall which he stated was not only of the highest architectural quality, but delivered transformational and lasting public benefit for workers, visitors and the City holistically. Mr. Scanlon stated all the schemes had been delivered sensitively and in close collaboration with neighbours protecting and seeking to celebrate the close-knit historic fabric which made the City so special, and included remnants of London Wall, the Grade I-listed St. Ethelburga's, St. Helen's Church, and the Grade II\*-listed Leadenhall Market. He added that the office space and amenity delivered had been appealing to occupiers and had supported employment growth within the City and noted that since 2013, Brookfield have secured 2,000,000ft<sup>2</sup> of pre-lets on their development pipeline and had completed over 5,000,000ft<sup>2</sup> of leasing transactions. Mr. Scanlon told the Sub-Committee that his firm was acutely aware of what it took to successfully deliver, lease and operate major schemes, and that expertise had shaped proposals for 99 Bishopsgate to ensure that it was deliverable, appealed to the future workforce and would provide transformational and lasting benefit for the wider community. He further stated that alongside 99,000m<sup>2</sup> of best-in-class essential office space, 99 Bishopsgate would provide vibrant and inclusive public and cultural facilities, including the city market, a new seven-day food and beverage destination and Open Gate, a unique standalone cultural building. Mr. Scanlon also noted that the development would contribute in excess of £40m through CIL and Section 106 obligations and create 7,500 new jobs. He explained to the Sub-Committee that the scheme prioritised sustainability, having retained and reused the existing foundations to reduce embodied carbon and the extent of demolition and vertical gardens an expansive terrace spaces would enhance employee wellbeing, foster biodiversity and provide visual amenity from afar, whilst urban greening initiatives at ground level would further enrich the visitor experience. The tenfold increase in accessible public realm would seamlessly connect with neighbouring consents and create new pedestrian routes which would connect Liverpool Street station to the heart of the cluster which met both the City's and the Eastern City's BID's ambitions. Mr. Scanlon stated that the site was of strategic importance and designated for tall buildings in both the adopted and emerging City policy and the developer's team, led by Graham Stirk of Rochester Carver and Partners, had shown great expertise and creativity, in shaping a scheme which balanced the many constraints and opportunities that the site presented. In collaboration with the City's design and planning Officers, and a wide range of stakeholders over the last three years, the scheme had evolved dramatically to address feedback. Mr. Scanlon informed the Sub-Committee that he was disappointed with St. Ethelburga's objections given the developer's long standing and positive relationship with the organisation and stated he believed that the applicant team had addressed key planning concerns and considered that the pocket park, a new vista of the church created by their proposals, would deliver a lasting benefit. He added that the developer remained in positive dialogue with St. Ethelburga's and was confident of reaching an agreement on neighbourly matters in the months ahead. Mr. Scanlon told the Sub-Committee that there was also disappointment

with the objections from Historic England and St. Paul's Cathedral. He concluded that the proposals for 99 Bishopsgate would be transformational and the wider scheme would change perceptions, attract new audiences and showcase the ambitions of the City's adopted and emerging Local Plan policies.

Mr. Sarralde of The Townscape Consultancy addressed the Sub-Committee and noted that since day-one of the design process, a large number of townscape views, including views of St. Paul's Cathedral as seen from Waterloo Bridge, had guided the design response. He stated that St. Paul's Cathedral was seen as a kinetic experience from the bridge, where the gap between the City Cluster and the Cathedral widened as the viewer moved south and added that the whole length of the bridge was important, not just its northern end. Mr. Sarralde informed the Sub-Committee that the proposed scheme sought to create a rationalised context, with massing sloping away from the sky gap at the same height as the top of Cathedral's dome, with a soft edge achieved by stark green terraces and slope glazing to reflect the sky and reduce its visual presence on the skyline. He added that the Greater London Authority (GLA), who were the authors and guardian of the LVMF, had confirmed the following position in the Stage 1 report, namely that the scheme responded appropriately to its position at the northern edge of the Cluster and maintained the clear sky backdrop to St. Paul's Cathedral. It also maintained the visual separation between the Cluster and St. Paul's through its sloping design and it had the benefit of obscuring a more complex group of buildings in the backdrop which provided a cleaner form to the edge of the Cluster that would have a more positive relationship with the Cathedral. Mr. Sarralde stated, therefore, that it was his assessment that the proposals fully complied with the LVMF management guidance for these views and considered that the scheme was of the highest architectural quality which would complete and complement the Cluster without negatively affecting the ability to appreciate St. Paul's Cathedral as an important strategic landmark on the skyline.

Ms. Dobbin of SRD Culture addressed the Sub-Committee and stated SRD Culture had worked with partners in July 2023 to audit the City of London's cultural provision to identify potential opportunities, and had found that there was a need for smaller culture centres where young creators could develop and showcase their work. Following that, SRD Culture, in November 2023, held round tables and co-design workshops with 18- to 25-year-olds and the architects to inform the vision, connect to place identify and provide indicative uses as was seen in the submitted cultural plan. The result of that was a mission to reinstate Bishopsgate as a cultural gateway and fulfilled the Destination City agenda to welcome all. Ms. Dobbin added that the developer team prioritised a new offer to the City, a gateway that invited underrepresented voices to take residence and sought an organisation that already existed but was in need of a home and wanted to grow to operate the six floors of the gallery hall and studios with 90 creative desk spaces and one that would deliver an authentic interest to reach out to the community. She further noted that the developer team was introduced to Intermission Youth and their need for a new home by the Mayor of London's team and their purpose, connection to quality

presentation and a desire to be embedded in a community matched Brookfield Properties' ambition for the cultural building.

Ms. Dobbin read out a speech from Darren Raymond, the Artistic Director of Intermission Youth: Intermission Youth is a registered charity that helps to transform the lives of young Londoners aged 11 to 30 plus through theatre, film, whole person support and community empowerment. Since 2008, we've worked with over 8000 young people to improve their life opportunities. Our productions include, but are not limited to, collaborations with Shakespeare's original language and contemporary and contemporary language that's been devised with the young people to align specific and universal stories of life as Shakespeare's original presence was here in the City, it seems a rightful place for intermission youth, to encourage young people to bring their cultural and contemporary perspectives into conversation with the histories of their city, we developed the name Open Gate in response to the original suggestion of Fourth Gate in the spirit of this mashup. The young people that attend our programmes are highly motivated, passionate and come from across all boroughs of London. We have strong links with national and local arts organisations such as Shakespeare's Globe, Royal Academy of Dramatic Art (RADA), BBC and Guildhall's School of Music and Drama. This can be our permanent home that we share and we reach out and embed in our community. We've been on a 15-month process of collaborative discussions with Brookfield Properties and our trustees about the spaces that it provides. We believe that we can help improve the City of London as dynamic and diverse and bring new opportunity to young people to see the City as relevant and supportive to them. So, we look forward to progressing our discussions with Intermission Youth and bringing forward a cultural implementation plan through the Section 106 to deliver these joint ambitions. Open Gate is an incredible opportunity to gain a unique vibrant cultural hub that provides a home for diverse creatives and draws new audiences to the City of London.

The Chairman moved the meeting to questions to the Supporters.

The Chairman welcomed the pedestrian capillaries that would be created and sought an explanation how cycle flows would operate in practicality for pedestrians who needed to be kept safe. A Supporter stated he expected the vast majority of cyclists would enter the site by the existing vehicular ramp from Old Broad Street and also expected that the travel plan locked into any planning permission would require tenants to encourage their employees to access on bikes via that means of access. He added that those cyclists accessing via Bishopsgate would need to dismount and, therefore, walk with their cycle bikes to the cycle entrance across the footway and noted there was no anticipation of conflict with pedestrians. The Supporter added, as a result, that the developers would work with City and dockless bike operators to ensure appropriate position parking zones were established and maintained to avoid clutter and conflict with pedestrians.

A Member stated that she felt that not showing the cycle parking on visuals could be misleading and expecting cyclists to dismount and wheel their bikes to the cycle hub was unrealistic given the weight of the electric bikes. The

Member also queried the accessibility of the scheme given the inclusion of steps in the visuals leading up to the pedestrian area which did not seem to include any handrails, and was not clear on how pedestrians with limited accessibility would make their way into the market space. The Supporter stated that, even though there was a change in level, it had been designed in close consultation with Andy Sturgeon Landscape Architects to ensure there was no need for a rail or steps, and people were able to freely access the site. The Member responded that for those accessing steps, the inclusion of a handrail was helpful to ensure accessibility had been covered.

The Member stated she applauded the choice of Intermission Youth as a partner for the cultural space and sought information on what guidance had been received by the developer from Officers on the choice of cultural amenity as she was not aware of the cultural strategy being worked on in the City. A Supporter explained to the Sub-Committee that they were encouraged to seize the opportunity to create a unique offer in that particular part of the City and knew there were a lot of higher-level public viewing galleries. As the location of the site, and its relationship with Liverpool Street and the significant number of pedestrians that would be moving around Old Broad Street, it was felt it would be fantastic to create a building in its own right that could offer different things to different groups within the wider community. Another Supporter confirmed there was a thorough audit of what cultural offers existed in the City, and what schemes had been consented to take a look at the balance of cultural offers there were, and a gap had been identified. The Supporter added that, following the audit, the development team felt the best thing to do was reach out to artists through workshops with 18- to 25-year-olds, and realised from the exercise that they did not stick to one art form. Therefore, that was why the proposed building offered a gallery and a hall that was flexible, and studios, which could accommodate the fact that the artists did not stick to one art form and a space where digital work could be carried out. The Supporter further added that the artists wanted a space where they could present and exhibit, so the development team worked on developing the cultural framework, as well as with the proposed City Plan, to ensure the proposal stayed current with adjustments that were coming up and complemented other offers in the area.

The Member followed-up on the question as to whether the developers had received guidance from Officers on cultural amenities. The Supporter responded that they did receive guidance in regard to the collaborative planning meetings and, through those sessions, put forward concepts and received feedback from them, carried out the workshops with potential users for more specificity and brought that feedback to Officers who were worked with to refine those suggestions.

The Member questioned how cultural offerings were selected and whether developers were assisted by being presented with a framework from Officers, and suggested the audit carried out by the development team on cultural offerings could be used to inform work being done at the Corporation.

A question was posed by a Member on what further design measures could be employed to reduce and mitigate further the impacts on heritage assets and St.

Paul's Cathedral in particular given the developer had the benefits of a study setting collated by St. Paul's Chapter. The Supporter stated that St. Paul's Cathedral had been consulted through the application process and noted their letter had praised the quality of the engagement, the material presented and the positive collaboration. He added that, as part of the consultation process with St. Paul's and Historic England, the development team embedded mitigation measures in the design which included the sloping of the building to reflect the sky in a different way to the body of the upright elements of the facades which meant that, at certain times of the day and with certain light conditions from testing done with CGIs, a much more lightweight presence and appearance would be presented compared to the body of the building which meant that there was a mitigation through the design of the development that would reduce its impact. He further noted St. Paul's focused a lot on the view from the northern end of Waterloo Bridge which was the narrowest possible gap between the cluster and the cathedral, but most people experienced that relationship in a kinetic way and one could see from the images it was the worst case scenario. He added that, from that view, the effect would not be perceived as such.

The Chairman opened questions to the Officers.

The Chairman queried whether there was any point at which, on the views from Waterloo Bridge, the proposed development was in the backdrop of St. Paul's and whether it was out of sync with current Local Plan policies as he did not understand the strength of the language in the objection with regard to that issue. Officers stated it related to LVMF 15B.1 at the northern end of the Waterloo Bridge which was where the acutest impact could be found on the Cathedral which was momentary. They added it was a visual impact rather than physical and the Cathedral and the development site were situated about 1km apart. Officers also stated that they had found a slight degree of harm from that view, and even less so, but again slightly, with the view from Hungerford Bridge too in relation to the reduction in sky space which formed some of the setting of the Cathedral so that it was very slightly narrowed. However, there was still a large amount of sky scape that was preserved, albeit with a slight reduction. Officers added that in none of the views, there would be no backdropping or direct encroachment on the silhouette and, in all the views, the Cathedral remained recognisable, commanding and clearly distinct from the City Cluster.

The Chairman requested, in relation to the traffic management plan for the scheme, that it was ensured there was clear signage on cycle dismounting and where trail lines were supposed to be located for cyclists to get to the cycle hub in the conditions. Officers confirmed that would be done.

A Member queried whether the setting corridors were available that went across St. Paul's Cathedral to see how it impacted upon the site. Officers stated that the setting corridors were only related to the panoramic views that were available from Primrose Hill, Alexandra Palace and Greenwich Park. They added, in relation to the river bridge views, that they were a kinetic experience as one moved between LVMF 15B.1 and further along the bridge, so there was no viewing corridor that one could see for the panoramic views.

Another Member drew attention to the emerging development Local Plan and asked when a level of harm was identified by Officers, and agree upon, whether any building within the City Cluster 'jelly mould' would be described in such a manner and then other policies would be applied, or was there specifically something about the proposed scheme to indicate they had gone beyond what was anticipated so there was a level of harm beyond what was assessed. Officers explained that the City Cluster contour lines were shaped to minimise the possibility of harm occurring to the three strategic landmarks: St. Paul's Cathedral, the Tower of London, and the Monument, so it did not expressly state that no harm would be caused as, in a place as complex and significant as the City, that was an unachievable goal at the macro-strategic planning policy level. Officers added that the contour lines were shaped in response to these views and minimised, in the Officer view, the possibility of harm being caused and the scheme fit entirely within those contour lines. Officers noted they considered that the scheme minimised the harm to a very acceptable level, and it was a fleeting moment of impact. While there was a degree of harm, it was entirely within the spirit of the contour lines in the City Plan.

The Deputy Chairman, in reference to LVMF 15B.1 view from Waterloo Bridge, suggested that the trees in the image diminished the prominence of the dome more than the buildings and queried whether trees would be cut if they continued to grow. Officers confirmed that the trees were pollarded.

A Member sought clarity around accessibility for pedestrians in relation to the scheme. Officers stated Condition 76 was included in the scheme, in relation to inclusion and accessibility, and Part F included an element with regard to public realm that would raise aspects such as handrails that were needed for steps. They added there was also an access management plan under Condition 77 and, in addition, there would be a public realm management plan within the Section 106 agreement that would ensure that the Mayor's Public Charter would be picked up in relation to inclusion and access. Officers further added that access Officers had reviewed the scheme and indicated they were happy with it.

Another Member queried whether there was any guidance on cultural offerings as they sought assurance there was an overall approach and noted it was an issue that the Culture, Heritage and Libraries Committee had discussed. The Chairman suggested the issue raised was better suited to be considered at the grand committee and stated that the Local Plan for 2040 had a chapter dedicated to culture in it. The Member agreed it should be considered at grand committee.

The Deputy Chairman expressed concerns about the proposal to mix cyclists and pedestrians as he had found it did not work due to a minority of irresponsible cyclists. He recognised that the scheme proposed a ramp entrance for cyclists to get access to the cycle hub and queried whether, if it did not operate well, whether it would be possible to mandate that cycles must go in via the cycle hub. Officers responded that the short-stay cycle hub would be impossible to access through the delivery bay service entrance. However, something could be secured via the travel plan which was secured by condition.

A Member also expressed concern in relation to the mixing of cyclists and pedestrians due to current issues with work on Leadenhall Street as some cyclists had been riding onto the pavement with disregard for pedestrians and was particularly concerned about those with mobility issues. The Member also stated there seemed to be no image from the northern end of Waterloo Bridge at night as it would be helpful to see. Officers told the Sub-Committee that the only nighttime image from Waterloo Bridge of St. Paul's Cathedral was the view from the south in the presentation and added that lighting conditions were included at the end of the pack which would ensure that the lighting was focused, and any public lighting was at the ground floor and needed to meet the City of London lighting strategy. The Member expressed disappointment that the image was not included in the presentation pack given daytime photographs had been included as it was an area of concern. The Chairman stated the need to ensure that conditions on the night light impact were properly conditioned through the lighting strategies that had been approved by the grand committee.

The Chairman sought assurances on cyclist behaviour. Officers confirmed that the report, on paragraph 909, stated that appropriate signage would be provided for the cycle hub for the benefit of office workers, visitors and members of the public, and stated, as an assurance, that there would be signs to encourage cyclists to dismount. Officers added that the public realm was technically private land for the developer and could enforce against cyclists if they wished, but further stated they would recommend that on-site facilities management and security staff ask those who do cycle to dismount to ensure the safety of pedestrians and other use of the area.

A Member stated that the images did not show dockless e-bikes which she suggested would be an impediment to pedestrian access given there had been issues on Wormwood Street with rows of dockless e-bikes and asked Officers if there were plans for people who dumped their dockless e-bike. Officers responded that the TfL bikes would have to be removed as part of the construction process and may, or may not, return to the same place. However, there were wider aspirations for the area as part of the London Wall Corridor study which meant the new location for TfL bikes would have to be agreed with TfL at a later stage in conjunction with the wider project. Officers added that the issue of the dockless e-bikes was one that was being addressed.

Another Member stated the pedestrian comfort around the site was important and was not clear if the pavements would be widened but added that pedestrian comfort was reduced when advertising boards and dumped bikes were an issue. The Member further added that the area was a very busy corner and whatever was implemented had to include a clear thoroughfare all the way around the development with obstructions removed quickly. The Member highlighted that the setting of St. Paul's Cathedral and its contribution to heritage significant was included in Historic England's objection and queried whether a briefing session could be organised on heritage as it would help inform the Sub-Committee on perceived concerns. The Member also questioned, having noted the number of conditions, what tweaks they would ask the applicant to undertaken to reduce the harm to the heritage asset as



much as possible, especially given that 122 Leadenhall Street (The Cheesegrater) was designed specifically to ensure there was no impact on the viewing corridor. Officers stated there was a significant raking profile of the tower was shaped directly in response to the Waterloo Bridge views and was a significant chunk of the scheme which stretched for 16-storeys from the position where it raked to the top and the position where it started to rake was set below the Cathedral's ball and cross to below the overall height of it. Officers noted they considered it was clearly deferential to the Cathedral. Officers further added that the raking of the building conceded Grade A office floor space that was needed, from around 100,000m<sup>2</sup> to the 99,000<sup>2</sup> that was proposed and noted there was a balancing act between growth and heritage.

The Chairman agreed it would be useful to have a Member briefing session on heritage so it was clear what was considered policy and the strains with the heritage lobby could be identified and addressed.

The Deputy Chairman suggested that the only way to reduce the harm would be to reduce the massing of the building and queried whether that would have wider implications, especially in relation to the offer of the cultural building as it would no longer be viable or affordable. Officers stated while they did not want to comment on a hypothetical scenario, it would have resulted in a very different scheme to the one before the Sub-Committee.

The Chairman moved the meeting to a debate.

A Member drew attention to an email that was received the night before from a representative of the Chapter of St. Paul's Cathedral in regard to their desire to speak at the Sub-Committee, but could not as they had missed the deadline for speaking outlined in the Planning Protocol and suggested more flexibility was needed around speaking as she did not believe it would have had a major impact had the representative been able to speak and it would have improved the transparency around the meeting. The Member also noted that the Town Clerk's Department received reports two clear weeks before a Committee meeting as per corporate policy and Members received the reports five working days before the meeting. The Member queried whether the reports could be made available earlier so reports could be digested as it would be a great help to the Sub-Committee.

The Member told the Sub-Committee she believed it was a great scheme in regard to the cultural offering, but agreed with a previous comment that the City needed to have a formed view of what offerings it already had, what it needed and what was lacking. She added that some developers, if they could not include viewing platforms, were moving to include cultural offerings, which could be next to a cultural offering that already existed and cautioned against having too many cultural offerings as the City had lost retail units and there was a need for a framework that provided a dynamic mix of users.

The Member expressed concerns that were highlighted by the heritage lobby and stated had the Sub-Committee seen the framework that informed the thinking around heritage assets, it would have helped to understand the lobby's

concerns and hoped, before it was constructed, that any impact could be reduced as much as possible.

The Chairman stated that matters of the Planning Protocol were not for the Sub-Committee to decide on and suggested the matter be taken away for discussion.

A Member suggested that the new lighting system that was to be used to light up St. Paul's Cathedral at night would significantly change its image in the images shown and transform the look of the dome to look more vivid and, further indicated, that it would provide the Sub-Committee with a much more comfortable feeling about the night view from Waterloo Bridge.

It was stated, by a Member, that she welcomed the confirmation of the anchor tenant Intermission Youth and was heartened to read how the relationship had developed with the developer directly as it was fairly unique in her experience and added she was keen to see how the relationship would develop further, including, potentially, with support with a home fit-out with running costs outside of whether the application was granted or not as it felt like meaningful social value. The Member also highlighted research undertaken by the YMCA that there had been a 73% cut in youth services since 2010.

The Chairman stated that the building itself was offering 99,000<sup>2</sup>ft of prime office space which was desperately needed in the City and, on that basis, the desire to have such a building was really vital for economic growth in the Square Mile. He added that the ground floor plain tenfold increase in public realm, with the cultural offering next door, could not be realised without the office building in place. He also drew attention to the issue of embodied carbon as a lot of work had been carried out to retain as much as possible. The Chairman indicated he was happy to support the application on that basis.

The Chairman moved the meeting to a vote on the application.

The Sub-Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 17

OPPOSED – 0

There were two abstentions.

The recommendations were therefore carried.

**RESOLVED** – That, Members approved the following recommendations:

- 1) That 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 subject to:
  - a. The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application

himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);

- 2) 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 agreement under Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;
- 3) That Members note that the proposal will require the rescission of the City Walkway through the Site and that should the development proceed, a report will be taken to the Planning and Transportation Committee seeking authority to rescind the necessary parts of the City Walkway; and
- 4) That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

6. **\* VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT**

The Sub-Committee received a report which detailed development applications received by the Department of the Built Environment since the report to the last meeting.

**RESOLVED** – That, Members:

- Noted the report and its contents.

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

The Sub-Committee received a report which detailed development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since the report to the last meeting.

**RESOLVED** – That, Members:

- Noted the report and its contents.

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

A Member sought assurance that all of those present for the vote on the Bury Street item that went to the 13 December 2024 meeting of the Planning Applications Sub-Committee would get an opportunity to participate in a discussion and determination of the reasons as to why the Bury Street application was refused. The Chairman indicated it was important for the minutes of that meeting to be approved and stated it would have been unfair to

call on Members to immediately vote on the reasons for refusal following immediately after that. Therefore, it was decided to move the Reasons for Refusal item to the next meeting of the Sub-Committee so Members had a chance to ensure the minutes were digested before a decision was made.

The Member sought clarification that Members would be allowed their own input into the reasons for refusal of the Bury Street application and opportunity to question whether they were satisfied with those reasons as the Member felt the refusal was not done solely on planning considerations. The Chairman responded that the Sub-Committee had tasked Officers at the end of the 13 December 2024 meeting to formulate reasons for refusal on planning grounds based on the discussion in the meeting and the report that would come to the 11 February 2025 meeting of the Sub-Committee would be the planning grounds for refusal. Officers confirmed that the report would be published in the next few days and stated they had reflected on the level of consensus on certain grounds in the report recommendations.

The Member queried whether Members would have an opportunity to amend the reasons for refusal report at the 11 February 2025 meeting. Officers confirmed they would.

The Town Clerk confirmed that the reasons for refusal report, along with the papers for the next Sub-Committee meeting, would be published on 03 February 2025.

A Member sought confirmation that only those Members who were present at the 13 December 2024 meeting for the Bury Street item could vote on the reasons for refusal. The Chairman confirmed that only those Members who were present at the determination of the Bury Street item could participate in the discussion and vote on the reasons for refusal.

The Member also sought confirmation that the grand committee would get the opportunity to receive a briefing in relation to the St. Paul's Cathedral setting and whether the prospect of getting papers to Members earlier than the five working days deadline would be reviewed. The Member also suggested a draft timetable would be useful for when applications were due to come before the Sub-Committee as it allowed Members and other stakeholders to be aware when reports would be published and what deadlines were associated with the meeting such as deadlines to speak. The Member also drew attention to a meeting on 28<sup>th</sup> May 2025 which fell during the School Holidays as there was concern that people could be away for the Bank Holiday as well. Officers responded that the letters that set out the timescale in which people were required to notify the planning department of the intention to speak was explicit, but indicated they would look at the letter to see if it could be made more obvious. Officers added, in relation to trying to give certainty as to when schemes would come forward, they would be keen to provide that as planning was volatile and big applications were particularly complex. They added that it could be a double-sided sword as people could be notified something was due to appear at Sub-Committee only for a deferment to occur which made it counterproductive. Officers further noted that when they were in a position

where they were as certain as they could be, they would highlight dates as they agreed it was important that people got as much notice in advance as possible.

The Member suggested a speaking protocol or guide would be helpful for those who registered to speak at Sub-Committee. Officers indicated the letters sent out did explain the speaking protocol.

The Chairman stated that the current timeframe for registering to speak was set so that if one speaker, either an objector or an applicant, they had time to coordinate the time amongst them as that was an important factor in determinations.

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

There was no other business that the Chairman considered urgent.

**The meeting ended at 11.46 am**

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Chairman

**Contact Officer: Callum Southern**  
**Callum.Southern@cityoflondon.gov.uk**

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## PLANNING APPLICATIONS SUB-COMMITTEE

Tuesday, 11 February 2025

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 11 February 2025 at 9.00 am

### Present

#### Members:

Deputy Shravan Joshi MBE (Chairman)  
Graham Packham (Deputy Chairman)  
Deputy Randall Anderson  
Mary Durcan  
Deputy John Edwards  
Deputy John Fletcher  
Deputy Marianne Fredericks  
Jaspreet Hodgson  
Alderswoman Elizabeth Anne King, BEM JP  
Deputy Natasha Maria Cabrera Lloyd-Owen  
Deputy Brian Mooney BEM  
Eamonn Mullally  
Deborah Oliver  
Alderman Simon Pryke  
Ian Seaton  
Hugh Selka  
William Upton KC  
Jacqui Webster  
Deputy Dawn Wright

#### Officers:

Fleur Francis	- Comptroller and City Solicitor's Department
Phil Carroll	- Environment Department
David Horkan	- Environment Department
Kieran McCallum	- Environment Department
Rob McNicol	- Environment Department
Tom Nancollas	- Environment Department
Gwyn Richards	- Environment Department
Kerstin Kane	- Environment Department
Anna Tastsoglou	- Environment Department
Amy Williams	- Environment Department
Peter Wilson	- Environment Department
Katie Stewart	- Executive Director, Environment
Polly Dunn	- Town Clerk's Department
Callum Southern	- Town Clerk's Department

1. **APOLOGIES**

Apologies were received from Ian Bishop-Laggett, Amy Horscroft, Charles Edward Lord OBE, JP, Alderwoman Jennette Newman, Deputy Henry Pollard, Tom Sleigh and Shailendra Kumar Kantilal Umradia.

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

Deputy Randall Anderson declared an interest in Item 5 as the Investment Committee was the proponent of the project and indicated he would not vote on that item.

Eamonn Mullally indicated he would not take part in the debate or vote on Item 4.

3. **BURY HOUSE 1 - 4, 31 - 34 BURY STREET LONDON EC3A 5AR**

The Committee received a report which recommended Reasons for Refusal to reflect the Committee's resolution of 13 December 2024.

The Chairman clarified that only those who were present during the consideration of Items 4 and 5 at the Planning Applications Sub-Committee on 13 December 2024 would be able to vote on this item.

A Member queried whether only those who voted against the application could consider the Reasons for Refusal. Officers confirmed it was a decision of the Sub-Committee and, therefore, those Members who had been in attendance for Items 4 and 5 at Planning Applications Sub-Committee on 13 December 2024 would be able to vote on the Reasons for Refusal.

Officers stated that the report related to two applications, an EIA application that proposed an office-led development through the demolition of Bury House and the erection of a new building which would comprise of four basement levels, ground floor plus 43 storeys, part demolition of Holland House and restoration of the existing Renown House. The application also included the erection of a four-storey extension at Holland House, a three-storey extension to Renown House and the interconnection of the three buildings. Officers added that the Listed Building Consent application related to restoration works to Holland House, including partial demolition to facilitate interconnection with the neighbouring proposed new buildings and construction of a four-storey roof extension. Officers indicated that Members took a different view to Officers at that meeting and resolved not to grant planning permission or listed building consent. Officers stated they had gone through a rigorous assessment of the debate at that meeting and, for that reason, recommended three reasons for refusal.

A Member expressed concerns that one or two Members had raised the issue of the impact on the Tower of London during the debate as it was part of their decision making around the application, but had not been taken into account in



the recommendations as a majority of the Committee had not raised it in their contributions and stated it was in direct conflict with the guidance given not to repeat points already made. The Member added that, in normal circumstances, the reasoning and rationale of those who made the decision to refuse was what the Committee was looking to understand and that was the basis of the decision. The Member further stated they hoped Members would think about what it was that those who decided to refuse considered to be material as that would properly reflect the decision that was made rather than whether they thought it was legitimate. She further added that, for those who voted in favour, they clearly did not think any of the reasons for refusal were legitimate and noted she did not see the three reasons as being the rationale for her refusal as one of the majority who voted against the scheme. The Member stated she understood that the reasons for refusal were important as they were a material consideration moving forwards and, therefore, if the reasons for refusal recommended did not reflect the actual decision making of the Committee, that would be wrong.

Another Member concurred with the previous comments and drew attention to Paragraph 5 which noted there were other matters raised as grounds for refusal. The Member stated that while not every Member may have echoed those grounds, there were also a number of Members who voted against the proposals who did not speak and, therefore, the Committee could not be aware what their views were and suggested that some may not have spoken as they felt their views had been covered. The Member added the grounds included those highlighted in Paragraph 3 and other points raised in Paragraph 5, which included the character of the Creechurch Conservation Area, the impact on the World Heritage Site, and the failure to protect the historic architectural interest of Holland House which, the Member felt, were all views voiced as grounds for refusal and should be included as grounds to refuse.

A Member suggested there was a danger of reopening the debate and, if the debate was to be reopened, those who supported the application would want to weigh in with additional points and asked the Chairman to provide a direction as, if it was the case that the debate was to be reopened, he was happy to weigh in with further arguments in favour of the application but, if not, suggested deciding on the basis of the three recommendations given.

The Chairman stated, from his understanding, that the minutes, which were approved at the last meeting of the Planning Applications Sub-Committee, were the reflection of the debate and the decision that was taken on that day, and the paper before Members was a translation of the minutes into valid planning grounds for refusal so there was a legal basis for refusing the scheme.

A Member stated it was not the done thing to repeat points already made, but to deduce that it meant there was no support for other points raised not included in the recommendation was inappropriate and queried how difficult it would have been for Officers to reach out to Members to ascertain the reasons for refusal. The Member added that he supported six of the areas and believed that other Members who had voted against did too. The Chairman stated that decisions were made in the room and needed to be abided by as coming back

with a survey following the meeting was not the way decisions were made. The Chairman further added that further items were raised and did not feel they were being ignored as they were on paper under Paragraph 5 and stated his understanding was Officers did not feel there was substantial agreement amongst the Committee or clarity that there was agreement for them being included as Reasons for Refusal.

A Member suggested a discussion of the three additional grounds highlighted in Paragraph 5 followed by a vote on each ground. The Chairman agreed and indicated his willingness to second the Motion.

**MOTION:** That the three additional grounds highlighted in Paragraph 5 of the Officer report be included in the recommendations, with all grounds being voted on individually.

The Chairman seconded the Motion.

Another Member suggested that given those who voted in favour of the proposal were seeking to reflect the decision making of those who voted against, it would be helpful if they were going to vote against a ground being included making clear they were someone who voted in favour of the application. The Chairman stated he did not see the relevance.

It was stated by a Member that the Sub-Committee needed to have faith in its fellow Members and what was being debated was not the substantive planning application, it was a reflection of what was said at the meeting. He added he trusted those who voted for against to reflect on what they heard was said and vote accordingly.

A Member indicated she would support the Motion and stated she understood the minutes constituted a correct record of the meeting if the application went to appeal and noted there was a video and transcript available that an appeal inspector could request to see. The Member added that the issue of the Conservation Area was reflected in the minutes as it had been highlighted in relation to the New National Planning Policy Framework by another Member. The Member further stated that the minutes reflected the grounds raised by Officers in Paragraph 5 and she did not hear anyone who spoke against the application indicate that they did not support any of the grounds that had been raised by Members who wanted to refuse the application.

The Chairman moved the meeting to a vote on the proposed Motion.

The Sub-Committee proceeded to vote on the Motion before them.

Votes were cast as follows: IN FAVOUR – 13

OPPOSED – 0

There were no abstentions.

The Motion was therefore carried.

**RESOLVED** – That, Members agreed the three additional grounds highlighted in Paragraph 5 be included in the recommendations, with all grounds being voted on individually.

The Chairman moved the meeting to a vote on the reasons for refusal:

The Sub-Committee voted whether to include the overbearing and overshadowing impact of the development on the courtyard as a Reason for Refusal as outlined in Recommendation 1.

Votes were cast as follows: IN FAVOUR – 16  
OPPOSED – 1  
There were no abstentions.

The vote was carried.

**RESOLVED** – That, Members agreed to include the overbearing and overshadowing impact of the development on the courtyard as a Reason for Refusal.

The Sub-Committee voted whether to include the loss of daylight and sunlight within the Bevis Marks Synagogue as a Reason for Refusal as outlined in Recommendation 2.

Votes were cast as follows: IN FAVOUR – 15  
OPPOSED – 2  
There were no abstentions.

The vote was carried.

**RESOLVED** – That, Members agreed to include the loss of daylight and sunlight within the Bevis Marks Synagogue as a Reason for Refusal.

The Sub-Committee voted whether to include the reduced ability to view the moon in the night sky from the Bevis Marks Synagogue courtyard as a Reason for Refusal as outlined in Recommendation 3.

Votes were cast as follows: IN FAVOUR – 13  
OPPOSED – 4  
There were no abstentions.

The vote was carried.

**RESOLVED** – That, Members agreed to include the reduced ability to view the moon in the night sky from the Bevis Marks Synagogue courtyard as a Reason for Refusal.

The Sub-Committee voted whether to include the failure to preserve the character and appearance of the Creechurch Conservation Area as a Reason for Refusal.

Votes were cast as follows: IN FAVOUR – 10  
OPPOSED – 7  
There were no abstentions.

The vote was carried.

**RESOLVED** – That, Members agreed to include the failure to preserve the character and appearance of the Creechurch Conservation Area as a Reason for Refusal.

The Sub-Committee voted whether to include the adverse impact on the setting and Outstanding Universal Value (OUV) of the Tower of London World Heritage Site as experienced in LVMF view 10A.1 from the North Bastion of Tower Bridge as a Reason for Refusal.

Votes were cast as follows: IN FAVOUR – 11  
OPPOSED – 6  
There were no abstentions.

The vote was carried.

**RESOLVED** – That, Members agreed to include the adverse impact on the setting and Outstanding Universal Value (OUV) of the Tower of London World Heritage Site as experienced in LVMF view 10A.1 from the North Bastion of Tower Bridge as a Reason for Refusal.

The Sub-Committee voted whether to include the failure to preserve the special architecture and historic interest of Holland House Grade II\* listed building, by reason of the massing, height and bulk of the proposed extensions.

Votes were cast as follows: IN FAVOUR – 7  
OPPOSED – 7  
There were three abstentions.

As there was a tie, the Chairman held the casting vote. The Chairman voted against the ground for refusal.

The vote, therefore, fell.

**RESOLVED** – That, Members of the Planning Applications Sub-Committee on 13 December 2024 decided to refuse the application for the following Reasons for Refusal (subject to notification to the Mayor of London and the Mayor of London being content for the City to determine the applications):

1. The development would, by reason its overbearing and overshadowing impact on the courtyard of the Synagogue, result in less than substantial harm to the setting and significance of the Grade I listed Bevis Marks Synagogue. The harm would not be outweighed by the public benefits. The development would be unacceptable and contrary to Local Plan

Policies CS 12, DM 12.1, DM 12.3; Emerging City Plan Policies S11 and DE7; London Plan Policy D9 C (1; d) and HC1 and the National Planning Policy Framework.

2. The development would, by reason of the loss of daylight and sunlight within the Bevis Marks Synagogue, adversely affect the ability of worshippers to carry out religious traditions and practices and manifest their religion in worship, being as such unacceptable and contrary to Local Plan Policy CS10 (1); Emerging City Plan Policies DE7 and the National Planning Policy Framework.
3. The development would, by reason of its position, height and massing, reduce the ability to view the moon in the night sky from the Bevis Marks Synagogue courtyard to the detriment of the ability of the worshippers to carry out important religious traditions and practices and manifest their religion in worship, contrary to Local Plan Policy CS10 (1); Emerging City Plan Policy HL1; London Plan Policy GG1 and the National Planning Policy Framework.
4. That, Members agreed to include the failure to preserve the character and appearance of the Creechurch Conservation Area as a Reason for Refusal.
5. That, Members agreed to include the adverse impact on the setting and Outstanding Universal Value (OUV) of the Tower of London World Heritage Site as experienced in LVMF view 10A.1 from the North Bastion of Tower Bridge as a Reason for Refusal.
6. The proposed development at Holland House, by reason of its inability to be carried out in the absence of an approved planning permission of the associated development as proposed under the terms of application 24/00021/FULEIA, would result in an incomplete and unsatisfactory appearance of the listed building, which would fail to preserve the special architectural and historic interest of and result in harm to the Grade II\* listed building. The harm would not be outweighed by public benefits. The development would be unacceptable and contrary to Local Plan Policies CS 12, DM 12.1, DM12.3; Emerging City Plan Policies S11; London Plan Policy HC1 and the National Planning Policy Framework.

#### **4. XL HOUSE, 70 GRACECHURCH STREET, LONDON, EC3V 0HR**

The Sub-Committee received a report which sought planning permission for the partial demolition of the existing building, partial infilling of the existing basements, refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public

realm including street market with associated highway works and other works associated with the development.

Officers presented the report to the Sub-Committee and noted the application site was located toward the southern edge of the city cluster. They stated that Leadenhall Market, Swan Tavern pub and the Pedestrian Alley Ship Tavern passage sat directly to the North with Gracechurch Street, Fenchurch Street and Lime Street located around the site.

Officers presented an image of the existing site and stated that the site's immediate context was predominantly commercial office buildings with retail or ground floor level with 20 Fenchurch Street across the road to the southeast and the existing building was completed in 2001. Officers added that the existing building was ordinary in its appearance, had roughly 7,700m<sup>2</sup> of retail space, roughly 20,000<sup>2</sup> of office floor space.

Officers presented the planning context to Members and stated that the building was not listed, nor was it a non-designated heritage asset. They noted that the building was not in a Conservation Area, but the Leadenhall Market Conservation Area, which contained the Grade II listed Leadenhall Market, was located directly to the north and part of the application red line boundary extended into the Leadenhall Market Conservation Area. However, this was the result of some below ground works to the basement and no works have proposed at ground floor level within the Conservation Area. Officers added that the Eastcheap and Bank Conservation Areas were in close proximity and the areas defined in the City of London Local Plan 2015, and the emerging City Plan 2040 was suitable for tall buildings. They also told the Sub-Committee that the site was not protected by any LVMF protected viewing corridors, but was part of the City Cluster which was visible in a range of LVMF views, including from bridges over the river.

The Sub-Committee was presented with more images of the existing context by Officers who stated that the entrance to the retail space was on the southwest corner, with the rest of the retail frontage being blank while the entrance to the office accommodation faced northwest onto Gracechurch Street and Ship Tavern Passage. Officers added that the building had quite a large footprint and was relatively self-contained and defensive in appearance despite being publicly accessible.

An image of the Leadenhall Market Conservation Area and Ship Tavern Passage was shown to the Sub-Committee by Officers who stated that, in the surrounding area, there were more historic lower rise buildings at street level with commercial office building which raised above. Officers further noted that residential properties sat to the north of the site and objection had been received from residents relating to a number of points; including the need for office floor space, overshadowing impacts, and noise and pollution.

The Officers presented images of the previous consent that was granted in 2021 and noted that the permission would expire in 2026 for a scheme which was very similar. They told the Sub-Committee that the applicants had decided

to bring forward new proposals for a design which would make the building more attractive to potential tenants by improving the sustainability credentials and increasing the quality of office accommodation. Officers informed Members that the current proposals would deliver approximately a 9% increase in office floor space when compared to the previous application and the previous permission proposed the full demolition of the building.

A diagram and image of the development was shown to the Sub-Committee and Officers stated that the proposals before the Sub-Committee were more sustainable, had been adapted to the most up-to-date sustainability standards, and the proposals included the retention and re-use of the existing office building. Officers added that a new tall building of 32 storeys would be constructed, resting above the podium block, and it was predominantly to be office accommodation which would contribute 4% toward the City's projected office floor space. They further noted there were positive changes to the ground floor layout, the cultural spaces, the elevated public space and the proposed architecture. Historic England had objected to the previous application, but not the current application and, in their response, Officers stated that they had welcomed the changes to the proposed buildings design. Officers drew attention to a diagram that showed the disposition of uses and how they would be arranged at the site, with the active public facing uses at ground floor level with public access on the upper most floors of the building in the form of an external and internal viewing gallery with office accommodation in between.

Officers stated that 60% of the building would be retained and reused and the proposals would target a WELL gold rating and a NABERS 5-star rating. They added that the previous consented scheme was not developed to seek Well and NABERS accreditation and the current proposals targeted a BREEAM 'Excellent' rating, the same as the previously consented scheme and 120 tonnes of structural steel extracted from the existing building would be reused for the structural columns on the uppermost floors of the building and the Jura limestone on the existing façade would be reused on the base of the proposals

The Sub-Committee were shown a diagram of the proposed ground floor plan by Officers who stated the proposals have resulted in a loss of retail space similar to the previous permission which was a material consideration that the application accepted the principle of the loss of retail. Officers noted that the ground floor plan would also have a pedestrian route through the building to facilitate pedestrian movement from Gracechurch Street to Leadenhall Market, as well as active ground floor uses which included a retail use and a cultural space positioned toward the west of the site. They added that a digital curated art wall would be positioned towards the northern end of the pedestrian route and cycle access would be positioned to the east of the site in a sensitive and appropriate location to minimise conflicts between pedestrians and cyclists. The existing servicing bay would be replaced by a flexible market space and servicing bay similar to the previous proposals for the site and the office lobby would be positioned on the south elevation set back from the street line behind columns.

Officers presented a CGI of the proposed pedestrian route with the office lobby, art wall and cultural entrance to the Sub-Committee and informed Members

that the facades would be finished in dark metal with the route being safe and attractive. Appropriate lighting would be built into the software of the room and details of the proposed materials, lighting and management of the space would be agreed through condition and a Section 106 agreement.

Officers also presented the layout of publicly accessible uses of the lower ground floor, the ground floor and level 32 and informed the Sub-Committee that a substantial amount of cultural space would be provided and there would be an increase in the quality and quantity of the space in comparison to the previous permission. The cultural space would be neighboured by a food and beverage service which would provide additional amenity to visitors. Officers added that the lower ground floor level would be a curated cultural space designed as a sensory rich environment with interactive displays and details of it were to be established through the culture plan. Officers stated that the elevated public space at level 32 would benefit from having both an internal and external area.

The Sub-Committee was shown diagrams of the connected public levels and Officers stated that the uses were distributed vertically across the building.

An image of the ground floor plan and the arrival point in the western part of the building was shown by Officers to the Sub-Committee who stated that the centre of the space would be a spiral staircase and lifts to take visitors down to an exhibition area at the lower ground floor level. Officers noted there would be lifts at the lower ground floor level to take visitors up to level 32 in under a minute, with security and queuing accommodated comfortably in the area. Officers drew attention to an area highlighted in red with a blue arrow on the ground floor plan which they stated showed how visitors would exit the building onto Ship Tavern Passage at the ground floor level.

Officers presented a diagram of the viewing gallery at level 32 to Members and stated that the space would have the flexibility of an internal and external area, and both of the spaces benefitted from great views of London on arrival. They told Members that visitors would enter a large lobby with dramatic views northwards over the rest of the City Cluster. The internal space would be curated and programmed through the culture plan and the layout of the terrace had been designed to maximise the ability of views westward whilst creating spaces which were comfortable for dwelling and socialising. Officers added that both the external and internal space would have spectacular views and presented an example of the views to the Sub-Committee and a CGI of the proposed landscaping of the external terrace. The proposed ground floor was also presented to the Sub-Committee.

Officers stated that the proposed loading bay and the pop-up market location in the southeast corner of the building, the diagrams of which were presented to the Sub-Committee, were similar to the consented scheme, with servicing taking place overnight between the hours of 10:00pm and 6:00pm. They added that the area would be used as a market at the loading bay during the day and the details of the management and operation of the servicing and market space would be agreed through management plans in the Section 106 agreement.



Officers further added that the servicing was the key difference between the consented scheme and the current proposals as the previous scheme had included service lifts within the basement which took up a significant amount of area.

The cycle access was presented to the Sub-Committee by Officers who stated that it was located to the north of the loading bay and the route to the cycle parking facilities which complied with the City's policy.

The scope of the Section 278 works was shown to the Sub-Committee. Officers informed Members that there would be a separately highway works agreement with Transport for London (TfL) on Gracechurch Street and pedestrian comfort levels had been assessed to be compliant with standards. They added that the existing steps at Ship Tavern Passage would be removed to create an accessible route into Leadenhall Market which was a key benefit of the proposals. Officers also noted that the carriageway would be resurfaced on Lime Street, Fenchurch Street and Philpot Lane.

In relation to office floor space provision, Officers reported to the Sub-Committee that occupants would enter the space on its southern elevation and the proposals delivered an increase in quality and quantity of office space compared to both the previous consent and the existing site. The core would be positioned to the north of the building and would create a generous, flexible floorspace which would be attractive to a range of potential tenants.

Officers presented a representative view of the Grade A office floor space that they stated would be provided and the views that offices would benefit from. They added that level floor 7 would include amenity space for the tenants and floor level 1 would include affordable workspaces which would have a dedicated entrance at Ship Tavern Passage.

An image of the proposed southern elevation was shown to the Sub-Committee by Officers who informed Members that the building's form had been carefully shaped with its skyline presence and environmental impact in mind and the proposed tower was to be an elegant addition to the City skyline. They added that the scheme had been thoroughly tested for microclimate impact which were acceptable with on-site investigation measures in place and complied with the City of London's guidance as set out in the report.

The proposed massing was presented to the Sub-Committee by Officers who informed Members that it had been sculpted to be a simple but symmetrical form in response to its context and the proposed tower would appear well on the sky and the site was located in the location suitable for tall buildings. They further stated that it would accord with all design heritage and tall buildings policy and the north elevation would be set back on the upper most floors to ensure there was no intervisibility between St. Pauls Cathedral and the processional room. Officers reminded the Sub-Committee that Historic England had not objected to the application and stated they had praised the design in comparison to the previous consent.

The Sub-Committee were presented with the existing and proposed east and west elevations of the proposed development. Officers told the Sub-Committee that the proposals would result in some daylight and sunlight impacts and two objections had been received which cited the issue as a concern. Officers stated, however, that the application performed better than the consented scheme and the proposals complied with BRE guidelines.

Officers informed Members that the applicant had undertaken a rigorous exercise to ensure the proposed building would have no intervisibility with the Cathedral from Fleet Street.

An image of the proposed development viewed from Gracechurch Street south was shown to the Sub-Committee by Officers who stated that one could appreciate the proposed architecture and explained that the tower would be broken into three volumes with strong vertical breaks and a repeating horizontal order. They added that the horizontal branding across the tower would work well with the overarching massing approach and the tower was an attractive, yet distinct element disassociated from the more traditional townscape below. Officers further noted that the base would have a simple gridded rectilinear which would be finished with reused materials from the existing building and would have an appearance coherent with its neighbours at the uppermost floors of the building. The facades pinched inwards which Officers told the Sub-Committee it created an interesting and dynamic roofscape.

A view of the proposed development from Fenchurch Street down Lime Street from the Eastcheap Conservation Area was shown to the Sub-Committee by Officers who stated that architecture of the of the proposed tower could be readily appreciated and the tower would be set back from the Conservation Area and replicated an appearance similar to the existing context. Officers also presented the Sub-Committee with an image of the proposed development from the corner of Gracechurch Street and Fenchurch Street.

Officers presented images of the existing and cumulative view of the development from the north end of Tower Bridge and stated that the proposal would appear behind, and to the right, of 20 Fenchurch Street and it was the view where the proposals would be most visible in relation to the Tower of London. Officers added that in most views of the Tower of London, the proposal would be obscured by 20 Fenchurch Street.

Officers also presented images of the existing and cumulative view of the development from LVMF 10A.1 on Tower Bridge and from South Bank at the London Bridge City Pier. Officers stated that 70 Gracechurch Street would appear as a high-quality addition to the city cluster and, in the cumulative scenario, would be screened by 60 Gracechurch Street which had a resolution to grant permission.

The Sub-Committee were also presented with images of the existing and cumulative view from King William Street of the proposed development by Officers.

Images of the existing and proposed view of the development from Lime Street were shown to Members by Officers who stated that the view was from within the Leadenhall Market Conservation Area, but the proposed building sat outside the Conservation Area. They added that a key characteristic of the Conservation Area was the proximity of tall buildings beyond its extent.

Officers presented images of the existing and cumulative view of the proposed development from Leadenhall Street looking south toward Leadenhall Market, from Bishopsgate looking south from 1-3 Bishopsgate.

The Sub-Committee were shown images of the existing and cumulative views from Southwark Bridge looking northeast toward the proposed development by Officers who stated that the scheme would appear behind 60 Gracechurch Street.

Images of the view from Waterloo Bridge of the existing and cumulative view of the development were shown to the Sub-Committee by Officers who stated that the proposal would appear a significant distance behind and away from St Paul's Cathedral and caused no harm to it. Officers added that the scheme would play a key role in the City skyline and would help to unify the overall shape and silhouette of the City Cluster.

Officers explained to the Sub-Committee that the building was strategically sited in the city cluster which followed a plan-led approach to consolidating tall buildings and growth in a manner which would be the least impactful and stated that the proposals sought to deliver 4.2% of the required office floor space demand to meet the key strategic objectives of the adopted and emerging City Plan. Officers added that the development would make a significant contribution to maintaining the City's status of as the world-leading financial centre. Officers suggested it was worth bearing in mind the previous consent for the site and stated they believed that the proposals before the Sub-Committee were an improvement on the previous permission, specifically in terms of sustainability, design and the proposed cultural offer. Officers added that the retention and reuse strategy and the approach to minimising operational carbon were a step forward the proposals in comparison to the previous consent. Officers further stated that the architecture would be a welcome addition to the emerging cluster, and it was considered to be a convincing architectural response. Officers told the Sub-Committee that the development would base footfall in the surrounding area and would form a positive relationship with Leadenhall Market and contribute to its long-term success whilst it added a new visitor attraction and destination in the form of an elevated public space on its doorstep. Officers concluded that the development represented a major strategic contribution to the City's economic and cultural objectives and, for the reasons outlined, recommended planning permission as stated in the report.

The Chairman invited the Objector to address the meeting and asked the Town Clerk to outline the speaking procedure. The Town Clerk explained the speaking procedure as outlined in the Planning Protocol.

Mr. Vergan addressed the Sub-Committee and stated he was the owner of a property in Bullhead Passage and had been for the last ten years. He told the Sub-Committee that he was very worried about what was going to happen 60ft away from his property and expressed concern about the light impact, the dust from construction, the noise, the hours of construction, and the years of construction expected. He also added he was extremely concerned about the Leadenhall Market Conservation Area as the market was getting boxed in and one could see on the corner of Fenchurch Street and Gracechurch Street that there was going to be a new building with a skyscraper. The building at 85 Gracechurch Street was in the middle of the market and there was also another completed building at Leadenhall Street and Gracechurch Street. Mr. Vergan further added that one of the reasons he had moved to the area was for the old Conservation Area and felt it was being completely disregarded what was happening to that area of the City. He stated he believed that the skyscrapers were not what Leadenhall Market needed and was extremely worried that no one had approached him and felt it had been brushed off like it was not a big issue. Mr. Vergan noted that he lived at the property and had a family in his condo, and another resident worked from home, so the construction of the skyscrapers around the area was a big concern, especially the one proposed.

The Chairman invited Members to ask questions of the Objector.

The Objector was asked by a Member whether consideration had been given to regular contact, even meetings, between the developers and residents as he had found from experience that such processes went much more smoothly when that happened and acknowledged the Objector's concerns about noise, dust and all the issues that came with development. The Objector stated it had been considered and noted his concern was especially in relation to the hours of construction. The Objector added he had lived in the City of London for 10 years and loved construction and big skyscrapers, but suggested that sometimes the envelope was pushed a bit too far, especially when one looked at what had happened to Leadenhall Market as it had been swamped with skyscrapers around it. The Objector stated he felt that the historic character, and the whole point of being in the City of London, was being lost.

The Chairman invited Supporters to address the Sub-Committee.

The Town Clerk explained the speaking procedure to the Supporters.

Mr. Nick Jarman of Stanhope addressed the Sub-Committee and stated that the site had been acquired in Spring 2022 with Stanhope's joint venture partner, Ontario Teachers Pension Plan. Mr. Jarman told Members that the 70 Gracechurch Street site benefitted from the existing planning permission being granted in September 2021 and had been working hard in the last two years to design a new transformation scheme that responded to the long-term sustainability requirements of the modern day office occupier and accorded with the aspirations of Destination City and the emerging City Plan 2040. He added, since the previously consented scheme in Autumn 2021, there had been a quantum shift in how buildings were measured and responded to long-term sustainability requirements and a scheme was presented before the Sub-

Committee that was well positioned in retaining 60% of the existing structure by volume and reused as much of the existing fabric as possible. The objective that had guided the Stanhope team through the transformation was to create a market leading sustainable building for the long-term which optimised and balanced commercial and social value for the minimal environmental footprint. He further informed the Sub-Committee that the scheme represented at least a 30% improvement on the previous consent in whole life carbon terms under a much more stringent method of calculation that now needed to be abided to and the site and existing building typology represented a significant opportunity to leverage the previous structure and drive the embodied carbon to the most efficient reuse arrangement possible. Mr. Jarman stated Stanhope was focused on continuing to monitor opportunity through the delivery of the scheme to ensure it was exemplar in sustainable development and noted that the proposals would provide over 80,000m<sup>2</sup> of much needed best-in-class office space with both public and office access to amenity. Stanhope had collaborated with the City of London planning team, Leadenhall Market, Eastern City BID and the wider community to provide an application that sought to take full advantage of its outstanding location and what it could offer to the Square Mile in a rejuvenated form. Mr. Jarman further added that, like the consented scheme, the proposals would provide a high level public viewing experience at level 32 which comprised of an indoor gallery, as well as a new outdoor garden terrace and a public pedestrian route was also proposed to run through the site which would create a new southwest gateway through to Leadenhall Market and would act as a catalyst for its future prosperity. It would be complimented by a varied range of retail and cultural spaces at the base of the building with a new pop-up market space on the junction of Fenchurch Street and Lime Street. Mr. Jarman further noted that the scheme had been curated for the public and in accordance with public need, in partnership with consultants Hatch and KPF, who aimed to create a journey experience for the public offer that was created around the social calendar and a series of exhibition spaces, with the apex of the experience being a view over a protected and special part of the London skyline which ensured it would not just be another viewing gallery, but a public cultural experience with a view. Mr. Jarman stated he acknowledged and recognised the comments made by the Objector and had sought to minimise the impact of the scheme on local receptors. He added, from the outset, that the developer had sought to engage with neighbours in a collaborative manner and had undertaken a comprehensive consultation on the proposals by posting 2,000 newsletters, holding four public exhibitions which were attended by 48 people, had hosted a project website which had been viewed by 3,000 people, and had delivered a social media campaign which reached over 400,000 people. He told the Sub-Committee that the submitted environmental impact assessment demonstrated that the impacts of the scheme on neighbouring properties were similar to the consented scheme and, notwithstanding that, the transformed scheme would result in significantly less demolition and a quicker overall construction programme which he hoped would contribute toward the minimisation of any temporary disruption. Mr. Jarman concluded that if Members resolved to grant planning permission for the new scheme, the development team would continue to engage proactively with neighbours to ensure that any impacts on amenity were minimised.

Mr. John Bushell of Kohn Peterson Fox Architects (KPF) addressed the Sub-Committee and told Members that the existing consent established a successful vision for the site with a design responsive to a complex context and provided an open and active ground floor, created a southern anchor and gateway for Leadenhall Market. He added that in wanting to make a change in the environmental performance by investing and keeping the existing structure, it had also provided an opportunity to positively evolve the design on other fronts. Mr. Bushell noted that KPF welcomed the Officer conclusion that the revised scheme was of a high-quality design, Historic England's comment that the new scheme was a calmer design which helped to reduce its visual impact, and that Historic Royal Palaces and St. Paul's Cathedral had no objection to the scheme. He added that the design represented an improvement over the previously approved scheme in relation to sustainability, the proposed public amenity and relationship to Leadenhall Market, the architectural design and the office product itself and, in terms of sustainability, it was a big step change. He explained that the entire basement would be kept, as well as the slabs, including the superstructure slabs and the concrete structure and would make a huge reduction in the impact of construction over the consented scheme as the building of a new basement and superstructure was avoided in the podium which represented a highly significant reduction in the impact on neighbours. Mr. Bushell told Members that KPF had spent two years adding a tower that threaded through the retained space and the retrofit approach that had been taken was both carbon guardianship while allowing for vigorous growth which he believed was part of the future of the City. He further added that the stone would be reused, which he stated KPF had proved could be done elsewhere, and there were significant improvements in the performance of the scheme, especially in relation to operational carbon which would be entirely transformed in the revised proposal and the development team had committed to monitoring the carbon performance over 10 years via the NABERS Scheme. In relation to public realm, Mr. Bushell added that the development team's research of other cities had highlighted the critical importance of a very active ground floor and had responded to that with an increased intensity of public uses at the base of the building and created a more direct and visible public route through the site which presented a clear gateway to the market, an arcade that was animated by the frontage and a curated digital art wall. He reminded Members that the delivery area would be a pop-up market during the day and noted that the destination space at the top of the building was both internal and external which made a unique offer in the City at height with views to the north of the cluster and long views to the west, and great care had been taken to ensure that queues did not detract from retail activity on the ground floor of the building. The development team's urban green proposals consolidated the green roofs to large terraces that were accessible by the public and users of the office at the top of the podium and the top of the tower. Mr. Bushell stated that KPF had lots of success in accessible places, including tops of buildings, and had kept within all Fleet Street views while strengthening each element of the building composition which had been part of a good dialogue with the City's planning Officers. The base had been refined and incorporation of the reused stone would give it character and a patina with the top celebrated with a greater architectural articulation which was more clearly defined and seen very positively by KPF. He further stated that the three elements had been

reconfigured to emphasise the long views to the southwest, some approvals immediately to the south and to increase the visibility of the tripod design from a distance. The entire building interiors had been redesigned and over two years had been spent optimising the efficiency of the scheme to maximise the performance of the office. Mr. Bushell further stated to Members that ten tenants would benefit from an active and curated base proposed by Hatch, and KPF were very proud of the existing consent and the way in which it had been allowed to evolve in dialogue with the City and overall, a new owner and development manager had driven impressive improvements to the building to make sure it was fit as possible a contribution to the future of the City. He concluded that 70 Gracechurch Street aimed to be best-in-class on all counts and on completion of the building, not as it was designed, and would be a robust, relevant and refined place to work and enjoy.

The Chairman invited Members to ask questions of the Supporters.

A Member sought clarification from the Supporters as to whether they had engaged with the wider community as the Objector had cited that there had been no engagement or dialogue with them at all. Mr. Richard Ward, from DP9 Planning Consultants, stated that consultation was extremely comprehensive and there were multiple attempts to approach all neighbours, including residents of Bulls Head Passage and added that the position taken early on was that nothing could be done to change the position of those who lived on that street as they had expressed concerns over the previous scheme which was granted. While the development team had reached out on four or five separate occasions, the position from residents was that they did not see the point in meeting with the development team as their position would not change. Mr. Ward added that if planning permission was granted, there would definitely be an attempt at further consultation to ensure that any disruption was minimised and a key point with the transformation scheme was that the development team believed the construction programme could be reduced by up to two years.

Another Member asked the Supporters to provide further clarity in relation to docked and dockless bikes as she was concerned about the safety of pedestrians. A Supporter stated that the access was just off Lime Street and was confident that there would not be any conflicts between cyclists and pedestrians as it was a small distance and expected that cyclists would dismount their bikes before they entered the basement. The Supporter added that the new pedestrian route would be a managed space to ensure people did not make a decision to ride their bike through the space and believed it could be controlled through the relevant access management plan secured by the Section 106 agreement.

The issue of vacant buildings was raised by a Member as he stated they were a real problem and it was an issue that needed to be addressed. He added that the building, at least from the outside, had appeared to be vacant for some time and, if consent was to be granted, queried how quickly construction could be started and what consideration had been given to meanwhile uses between the meeting and the actual start of construction. A Supporter informed the Sub-

Committee that Marks & Spencers (M&S) had closed their stall on the southwest corner of the site as they had not seen the store as profitable within their operation model which had not been motivated by the owner of the development. He added they had been in dialogue with M&S about what they wished to do with the space as they were currently still in occupation and the development team had, as part of the application and consultation, looked at a number of meanwhile uses and as the opportunity to be able to take discussions further, the development team would look at the potential for reactivating the southwest corner of the site.

A question was raised by a Member as to whether the Applicants could confirm that there were toilets available to the public at both the round floor and the viewing area, and asked the Applicants to confirm the opening hours for the public. The Supporter confirmed that there would be public toilets available to the public at the base of the building, and at Level 32, and the public viewing space would be open to the public from dawn until dusk.

The Chairman questioned whether the applicants would be willing, if it were proposed, to set up a group to give residents impacted by the construction regular updates and coordinate with them to ensure there was cooperation and coordinate around the development. The Supporters they were.

The Chairman moved the meeting to questions of Officers.

A Member requested whether some appropriate signage could be provided at Ships Passage, as it was currently a blank wall, to direct pedestrians to Leadenhall Market. Officers confirmed there were wayfinding and signage conditions attached and would work with the applicants on that.

Another Member sought clarity and a comparison in relation to the impact of total whole life carbon emissions on the consented scheme against the proposed scheme. Officers explained that the consented scheme had 1,774kg CO<sub>2</sub>/sqm of embodied carbon emissions in comparison to the proposed scheme which had 1,293kg CO<sub>2</sub>/sqm of embodied carbon emissions. The Member asked for the total number. Officers explained that they could not compare the total numbers as the consented scheme was calculated by the previous applicants on significantly less floor space for an unknown reason. However, the total embodied carbon emissions of the proposed scheme were around 103,000,000kg CO<sub>2</sub> and the total embodied carbon emissions of the consented scheme based on the GIA of the proposed scheme (to make the 2 schemes comparable) would be 139,000,000kg CO<sub>2</sub> which was roughly an improvement of a third on total carbon emissions. Officers indicated that multiplying the per square meter carbon emissions of the consented scheme and the proposed scheme by the same amount of floorspace was the best way to compare the 2 schemes. The Member further queried whether the method to work out the total carbon emissions figure was to take the total of the previously consented scheme and multiply it by the square metres of the proposed floor space. Officers stated that the consented scheme figures were not quoted in the planning report relating to the consented scheme, and the consultants of that scheme had used a smaller total floor space figure for the consented



scheme as what was approved which Officers did not know as to why that had been done, but the square metre figure was what counted which indicated an improvement for the proposed scheme of a quarter on the consented scheme. The Member stated she had a very different view as to what the important figure was as the total carbon emissions was what impacted upon the environment and queried whether it was wrong that one could not say with accuracy what the previously consented scheme's total carbon emissions were and the assertion from the applicants that it had considerably improved was one that could not be established.

The Member also questioned whether the inclusion of a pop-up market could detract from Leadenhall Market and what would be done to mitigate that. Officers stated they were of the view that it would be a positive addition to the wider area and was relatively small in comparison to the market. They added it would contain a couple of food stores and suggested it was worth bearing in mind how much footfall the proposed office building would add to the wider area.

The Member also sought clarity on Historic England's position as she stated they had acknowledged it was a change for the better, but a limited one and that broadly the development was the same in terms of its height and scope when compared to the previously consented scheme and the Officer presentation and the Supporters had given the impression it was an endorsement from Historic England. Officers responded that Historic England had raised concerns about the consented scheme on heritage grounds, but also raised concerns specifically about the quality of the design and the effect of the designs on the setting of the World Heritage Sign, so the comments on the last application were very design focused which was why Officers had taken the view of their response to the proposed scheme that the changes to the design and its quieter quality was welcomed and the knock-on impact on the heritage setting was a shift in position. However, Officers acknowledged that Historic England did still have some concerns as reflected in the report.

The Deputy Chairman enquired whether the proposed scheme was more environmentally friendly than the already consented scheme as the carbon burden per square metre was better and indicated he disagreed with previous comments that had been made as to the importance of the carbon burden per square metre. He added it was an important metric, and if a smaller building was consented on the site, it meant that another building needed to be built elsewhere to ensure the office floor space was provided. Officers suggested that while it could not be compared accurately at the moment as the previous applicants had used a different square metreage than was proposed for the consented scheme, in square metre terms it was a significant improvement for embodied carbon emissions, particularly in relation to the upfront carbon and the advantage of the scheme was that a significant amount of basement structure and superstructure would be retained which was so far unseen in such developments where a smaller development was replaced by a tower structure. Officers added that the way the applicant had designed the façade to be lightweight and the strengthening works to the existing structure were innovative and was an interesting attempt of a retrofit combined with a new

element and presented opportunities to improve the public realm, integrate a lot of urban greening and achieved a much healthier building than the previously consented scheme.

The Deputy Chairman questioned whether it would be a reasonable assumption to assume that, as a result of retention of much more substructure and superstructure, it was obvious that the proposed development was a more environmentally friendly building. Officers confirmed it was correct that it was more environmentally friendly and a lot of the façade materials and structural elements were not just retained, but would be reused in the new structure which was evident in the design of the building.

A Member stated she appreciated there would be space for pop-up stores, but there had been a significant loss of decent-sized retail units due to recent application consents and schemes that were being built which raised concern as she felt she could not see a plan in place to replace retail units and queried why retail units could not be put on the first and second floors of the proposed development if there was no space to accommodate them on the ground floor, and what plan was in place to ensure large retail units were being replaced. Officers responded that retail and office use were in the same use class and the developer could move freely between those uses without planning permission. Therefore, Officers had no control over whether the M&S was still open, or if it wanted to change to offices. Officers added they had already resolved to lose the retail in the space, but took the point made by the Member about the loss of large format retail. Officers stated they considered the pop-up market and the active frontage provided at ground floor, not only the public uses through the route, would provide an improved level of active frontage across the site and would draw visitors up to level 32 as well. Officers added it was important to remember that the City's primary function was office floor space as its business function which was why office floor space was being prioritised. Officers stated that the scheme offered major improvements to enhance the Leadenhall Market area, including the routes going through it, the food and beverage offer and their evidence showed that the Leadenhall Market area was one of the areas of lowest demand for increased growth in retail over the next 15 years which was much smaller than the area around Liverpool Street Station. They further noted that M&S could have retained their space in the building, but had decided to move away and, while they acknowledged that other retailers may have wanted the space, on the whole the option to support small retail food and beverage offers to enhance the routes through to Leadenhall Market would be key to delivering the scheme and key to the enhancement of the area. Officers further added they had also explored work with the Business Improvement District (BID) in the area to see what could be done to address issues around retail, but stated there was a judgement to be made on the appropriate retail to be delivered as part of the scheme.

The Member indicated she understood the concerns raised by the Objector and sought assurance that the recently approved developments in the area would not begin construction at the same time and residents would be protected as there had been issues with previous applications with not reaching out to residents. The Member also sought assurance that the applicants would reach

out to residents to reduce the disruption. Officers responded that construction would have to be coordinated across all the sites where consent had been granted or had received a resolution to grant across Gracechurch Street which would come through demolition plans, logistics plans, construction plans and scheme protective works. Officers added that scheme protective works conditions encouraged developers to liaise with and engage meaningfully with the residents throughout the construction period and there was a construction monitoring clause within the Section 106. The cumulative impact of the construction had also been assessed thoroughly within the report and took into account noise vibration, both from the proposed development and other cumulative schemes across the street.

Another Member indicated he agreed with a previous statement that the development was a substantially more environmentally friendly building, but sought clarification on a comment by Officers that the previous carbon study for the consented scheme was based on the wrong square footage and the actual square footage of the consented scheme was different as there seemed to be a suggestion that the proposed scheme was a much larger building despite seemingly being a similar sized building. The Member emphasised the need to understand what was previously approved in relation to the square footage of the previous building to establish whether the carbon study was based on incorrect figures. Officers responded that the per square metre figures for the proposed scheme were correct. However, Officers had only just discovered that the overall floor space of the consented scheme was smaller for the carbon calculations, but not for the overall scheme on the day of the meeting. They added that they were not clear as to why the consultant of the consented scheme had used a different square metre figure GIA, but it was important that the square metre figures for the proposed scheme were correct. Officers further noted that they had calculated the consented scheme's per square metre figure and multiplied it by the floor space for the proposed scheme to make it comparable, and the consented scheme had higher whole life cycle carbon emissions than the proposed scheme before the Sub-Committee.

The Chairman moved the meeting to a debate.

A Member stated he wished to compliment the Officers and structural engineers of the site for what they had done and noted there had been a move to reusing material, not just in basements but in above ground structures as well and added that it explained how 30% less carbon was able to be used.

Concern was expressed by a Member that the Officer presentation described a tall building as being a key characteristic of a Conservation Area and stated that it fundamentally misunderstood the meaning of a Conservation Area. The Member also raised the issue of retail and noted that while Officers were working with BIDs to improve the situation, they had also stated their analysis suggested it was not needed. She added that she hoped there would be opportunity at the grand committee meeting to raise questions that were more systemic in nature. The Member also stated that while she appreciated efforts made by Officers in relation to the environmental impact, she felt that the

details around carbon figures were not a sufficient priority given figures around office floor space had been provided.

Another Member indicated she did not support the previous consented scheme, but appreciated that the design had been refined and the height of the structure had been cut down somewhat. However, there was still an impact on the Conservation Area, Leadenhall Market itself and Historic England still had concerns about the impact upon St Paul's Cathedral and the Tower of London. She added she was surprised with a response from Officer in regard to retail not being required in the area given the tall buildings being constructed in the area and those working in those buildings would want access to retail facilities. The Member told the Sub-Committee that the City needed to be doing what it could to provide large usable retail space if it wanted to be a 24/7 city as pop-up and coffee shops were not sufficient, and was split on her decision as she was concerned about the impact on listed buildings and the Conservation Area. She further added that she felt for the residents and everything needed to be done to ensure the construction phase was carried out as smoothly as possible. The Member noted there was a five-year timespan on the application rather than three, and suggested she preferred three as it encouraged developers to begin development quickly and ran the risk of the scheme being returned in five years, or the scheme beginning development in five years with an out-of-date Section 106 agreement. She told Members that she hoped five-year consents were not going to become the norm.

The Chairman drew the debate to a close and stated he felt that the scheme had merit and was a definitely improvement on the previously approved scheme. He told the Sub-Committee that instinctively, the carbon story seemed to be a positive one and added that the development would make a huge improvement to the London skyline as there were gaps in the City frontage that the development would help smooth with building the eastern city cluster out and make it a much more beautiful vista from the various vantage points along the River Thames. The Chairman added that he believed the key retail site was the Leadenhall Market, and any development needed to work around the ecosystem of the Market as a retail offering. He noted he took on board the criticism in relation to retail in the unit, but felt that the flowthrough encouraged visitors to come through the building to the major sale anchors in Leadenhall Market which was critical and something that had been paid attention to by Officers.

The Chairman moved the item to a vote.

The Sub-Committee proceeded to vote on the recommendations as detailed in the Officer report.

Votes were cast as follows: IN FAVOUR – 14

OPPOSED – 0

There were two abstentions.

Therefore, the recommendations were carried.

**RESOLVED – That, Members agreed:**

- 1) That 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 subject to:
  - a. The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);
- 2) 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 agreement under Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed; and
- 3) That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations

**5. RIVER FORESHORE ADJACENT TO RIVERBANK HOUSE SWAN LANE EC4R 3BF**

The Committee received a report which sought planning permission for the proposed removal/cutting down to bed level of the existing campshed timbers; removal of gabion baskets and steel tie rods between the existing campshed and anchor posts; installation of new sloped revetment formed from imported granular fill and rock mattresses; installation of Rock Bags in the gap that has formed between the two of the sheet pile campshed retaining walls at the western end of the site; and reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.

Officers presented the existing plan to the Sub-Committee and informed Members that the foreshore had been covered by a flood defence for the flood wall itself which was known as a campshed. The existing plan showed the extent of the campshed which was subject to the application on the eastern side and the blue ingress showed the material that had been lost and the damage done to the flood defence as a result of failed timber piling and retaining walls which the repair and replacement of was subject to the proposal.

The existing section of the retaining wall was shown to the Sub-Committee by Officers who stated that the distance between the existing wall and the riverbed itself here showed the level of material that had been lost; the second diagram was taken from slightly further west and showed the different in area in the campshed across the site.

The demolition plan was presented to Members by Officers who informed the Sub-Committee that the proposed works concerned the failed gabion baskets

which were damaged and added that the main site of the material had been removed due to the failure of the retaining wall.

The Sub-Committee were presented with an image of the proposed plan by Officers who told Members that the image showed a rock mattress that would be installed to replace the campshed to bring it back up to line, a new existing wall, the dolphins would be retained and some localised repair would be carried out on the west area.

Officers presented the proposed section to the Sub-Committee and stated that the rock mattressing would be placed with low loose soil, or loose material on top of it, to more appropriately mirror a typical riverbed. While it was not possible across the entirety of the rock mattress, it could be done across most of it. Officers added that the image showed that there was no material on top of the western section.

Another image of the proposed section was presented to the Sub-Committee by Officers who stated which showed that the material laid underneath the rock mattress would not be lost.

Officers informed the Sub-Committee that a number of objections had been received, principally related to the archaeological value of the site, noise and disturbance and the impact on the natural habitat. Officers presented an image to the Sub-Committee and stated it showed the progression of the river since the Roman period and showed the area to the north of the river wall was relatively new, so the area of the riverbed was not immediately adjacent to Roman London. Officers added that a desk-based assessment had been undertaken and submitted with the application which had been considered appropriate, supported by the statutory consultees Historic England and GLAAS and, further to that, a written scheme of investigation was recommended via condition to further the archaeological understanding of the area. In relation to noise and disturbance, Officers stated that it was principally about the construction impact and, therefore, the impacts were temporary. Nevertheless, a scheme for protecting neighbouring residents was required by condition with a construction management plan. With regard to the impact on the natural environment, Officers noted that the campshed itself was a man-made structure so there had been interventions in the area already, and the proposal triggered the need for a biodiversity net gain (BNG), which was a national requirement, and, in this circumstance, there would be a 20% increase in BNG as secured by condition and was demonstrated as achievable in the application material.

Site photographs were shown to Members by Officers who stated they showed the scale of the material that had been lost in front of the dolphins and also showed the failure of the timber pilings and the sorry state of repair they were in. Officers added the proposals were considered appropriate in the context of development plan policies, the National Planning Policy Framework, the draft City Plan, and necessary and, given the conditions attached related to archaeology, disturbance to neighbours and the ecology of the site, the

proposals were also considered acceptable and Officers recommended approval.

The Chairman stated there were no Objectors speaking against the application.

The Chairman added there was one supporter who was present for questions.

A Member stated he understood the need to repair the defence, but could not understand the replacement of the tidal Thames which was currently wood, sediment and sand, with rock as it seemed out of keeping with what was in place at the Thames bank and sought an explanation as to why rock bags were to be used. Ms. Trina De Silva, of the City of London Corporation, stated that the designers had gone for rock bags in the area due to the London Underground tunnels being directly beneath the site which they wished to avoid doing any work near to avoid any piling or excavation on the foreshore. She added that the rock bags would not cover the entire area and was looking to install 0.4m of loose material on top of the rock bags where possible. However, in areas where the gradient was too steep, the material was likely to be washed away which meant those rock bags would be exposed.

The Deputy Chairman requested the use of gabian baskets or wire mesh be used on the rock bags to eliminate the use of plastic as he was concerned microplastics would get into the river as, while it was a small impact, it would be good to make a start on eliminating the use of plastics on the river. Ms. De Silva responded that the proposal sought to use plastic mesh with the rock mattress and indicated she would have to discuss with the designers to see if wire could be used instead.

A Member noted that the Thames Estuary Partnership, on such projects, advocated the activation of the river wall by the installation of horizontal ledges between high and low tide to allow for it to be colonised by shellfish and seaweed to create a marine wall which was self-irrigating and suggested it should be added to the proposal as it was a cheap way of beautifying the wall. Ms. De Silva stated it would be looked at and noted there was a proposal to install vertipools on the face of the wall in front of the campshed. She also added that she had suggested to the designers exploring the feasibility of installing timber.

Another Member expressed concerns about the use of plastic, especially as the City was the Port Health Authority, and expressed to the Sub-Committee that the use of plastic should be completely avoided. The Member added it would also create a more slippery surface for those who walked down the foreshore. She also stated she agreed with a previous comment in relation to allowing the river wall to be activated as rock pools allowed for small fish and microbes to survive tidal changes and suggested if the City was to carry out work, it should be exemplar to demonstrate to other developers that there was a tried and tested way of making repairs and was better for the environment. The Member also expressed concerns that the proposal could convince other developers

that the rock bags covered in plastic were a quicker and cheaper option and could make the foreshore inaccessible for mudlarks. She added it was a polluting environment and did not enhance the river ecology and suggested the Sub-Committee ensure that what was approved was environmentally friendly. Ms. De Silva responded that they were planning to install vertipools, which were rock pools, on the face of the river wall and, potentially, within the rock mattresses, and the use of horizontal timbers had been discussed with the designers to see if they could be incorporated. She added that there would be loose material as the surface for some of the campshed where the gradients allowed, so the rock mattresses for quite a lot of the area of the campshed would be covered by loose material.

The Chairman noted that one of the main concerns in the report was ecological impact and queried whether the materials had been assessed for their ecological impact. Ms. De Silva confirmed they had and, while the Environment Agency had indicated they would have preferred no metal or plastic in an ideal situation, they had accepted it as a solution on the site. She added, in relation to the ecological value of the site, that it had been considered under the BNG requirement which related to the installation of the rock pools to improve the biodiversity of the site.

A query was raised by a Member as to whether it was a point of dispute that Roman remains could be found in the location of the proposed development, or had accepted there would not be remains in the location. Ms. De Silva indicated she had not gone back to Objectors on the issue but, since the application was made, a walkover survey had been carried out on the foreshore and there had been no objection from Historic England who accepted the work that had been done so far and did not have any concern over the campshed being restored. The Member asked if most of the objection could be discounted as they were based on an inaccurate understanding of the likelihood of Roman remains being found in the location. Ms. De Silva responded that that material was constantly moving and could not say what was there at the moment, but Historic England did not have any concerns.

Another Member expressed approval that a desk-based exercise had been carried out and sought reassurance as to whether any other appropriate archaeological organisation would be invited onto the site to do a physical examination. Ms. De Silva responded that a walkover survey had been conducted by an archaeology consultant and Historic England had indicated that no further archaeological work was required. However, she added that in the event of something being discovered that seemed significant, there was a consultant on board with the scheme who would be contacted.

The Supporter was questioned by a Member as to how much thought had been given to materials that allowed for walking along the foreshore as it became an important site for walking during the pandemic and the sediment had been useful for that purpose. Ms. De Silva responded that the areas covered in loose material would be similar to the rest of the campshed and fairly easy to walk on, but the areas with rock mattresses would not be as easy to walk on and,



therefore, could be areas that were more difficult to walk on following completion of the work.

*At this point, the Chairman sought approval from the Sub-Committee to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.*

A Member expressed concerns that plastic would be used and suggested, if the plastic did leech into the water, that another alternative needed to be explored. The Chairman suggested the question would be best answered by Officers.

The Chairman moved the meeting to questions of Officers.

The Chairman asked Officers to pick up the concerns raised about the leeching of plastic into the river. Officers highlighted there were other regulatory stages the development needed to go through that were more detailed than the planning stage and stated he was sure the ecological impact would be at the forefront of their mind. They added that the proposal would require to be signed off by the Environment Agency, the Marine and Maritime Organisation, and the Port of London's sign off. However, they had been consulted at the planning stage and had accepted the methodology of the scheme.

The Chairman queried whether the material used would be part of further assessment going forward. Officers stated they assumed that the Environment Agency would consider it.

A Member stated it was immaterial whether or not the plastic chemically leached into the water as there was no plastic that would not contaminate the water, regardless of how chemically stable it was as it would be abraded by material in the river flowing over it which would lead to microplastics being released into the river. He added that it was the clear view of the Sub-Committee that it was a problem and not something that should be considered acceptable. While there were technical considerations to the material used, it seemed that stainless steel, albeit a more expensive alternative, could be used which was potentially why it was not used in the first place. The Member questioned by what mechanism could the discussion be continued with the applicant to ensure that a technically feasible solution, that met the Sub-Committee's concerns, be reached. Officers indicated it could be addressed by condition, or by an informative, if the applicant shared the information that they submitted to the Environment Agency at the same time.

The Chairman stipulated that concerns about the material used be considered going forward and asked Officers to formulate wording for a Motion.

Another Member suggested whatever scheme that be agreed enhanced the river as part of the City's role as Port Health Authority and made it exemplar so other foreshore owners could see how they could repair foreshores to the benefit of the river. She also stated that she hoped departments would not work in silos and ensure work was joined-up to ensure something was not agreed which was detrimental to the environment.

The Deputy Chairman suggested that the Sub-Committee be more forceful in relation to horizontal ledges on the marine wall as there did not appear to be a lot of enthusiasm from the applicant when the issue was discussed and could be achieved inexpensively.

A Member queried whether the justification for the rock solution was due to the location of the site above a sensitive tunnel or was it desired to have the foreshore turn into a rock shore as he stated he was uncomfortable with existing materials not being used and the style not being sympathetic to the current surroundings.

Officers stated that the condition would be similar to other submission of materials conditions that would require the submission of materials, specifically related for the rock mattress, to be signed off for the discharge of that condition.

The Deputy Chairman advised that the plastic could be removed by using gabian baskets or wire mesh on the rock bags, especially as the material was a natural material that, while it would erode, was less environmentally harmful.

Officers recommended wording that read:

*Prior to the commencement of any works, details of the materials for the rock mattress shall be submitted to and approved in writing by the Local Planning Authority, and the reason for that condition would be to ensure that there was no adverse environmental or ecological impact on the River Thames or the Foreshore.*

Officers added an informative could also be added to the supplement that captured the general comments from the Sub-Committee in relation to concerns about the use of plastics and the developer should be looking to use the most environmentally friendly solution.

The Chairman requested that the Motion included the marine wall enhancement with the horizontal slats. Officers responded that it could be added, although the proposal did provide the 20% BNG and expressed concern that such works might be over and above what was proposed by the application which potentially required the need for a separate planning application. However, Officers confirmed they could apply an informative to look into it, and other means of improvement. Officers added that such details would be fleshed out as part of the ecological management plan in the approval details.

The Chairman proposed a Motion to the Sub-Committee.

**MOTION:** Prior to the commencement of any works, details of the materials for the rock mattress shall be submitted to and approved in writing by the Local Planning Authority, and the reason for that condition would be to ensure that there was no adverse environmental or ecological impact on the River Thames or the Foreshore.

The Deputy Chairman seconded the Motion.

The Chairman opened the floor to a debate on the Motion.

A Member suggested that the Motion seemed unnecessarily narrow and gave the applicant an easy route out through the limitation of the Sub-Committee's consideration of materials specifically to the rock mattress and asked whether it could be broadened to include all materials which would remain in the river at the end of the development as he was concerned that the plastic-covered rock mattress could be removed and replaced with another plastic material which would mean the condition had been complied with.

It was stated by a Member that she was concerned with the Motion being limited just to rock mattresses as there were potentially more environmentally friendly ideas and suggested her preference would be that the applicant explored the most environmentally friendly option, with the exclusion of plastics, to enhance the river ecology. The Member added that bags with metal would get ripped and could become dangerous and stated she felt it was bizarre that the Sub-Committee could approve an application that could be detrimental to the river that the City, as the Port Health Authority, was responsible for. Officers expressed concerns that rock mattresses were a fundamental element of the proposal and if it was conditioned to include any kind of foreshore protection, it would not meet the nature of the planning application scheme source. They added, however, that more words could be added to the condition.

Another Member queried as to what the consequences would be if the application was deemed not acceptable by the Sub-Committee as they stated many Members were concerned about the basis of the application. Officers responded that the applicant was keen for the application to come before the Sub-Committee before the Court of Common Council elections as the next Sub-Committee meeting was not until May. Officers added there was some urgency for a decision due to the damage that had been caused to the river wall, and the Environment Agency had served a note some years ago about damage that was being caused to the river wall as a result of the campshed failing.

The Chairman amended the Motion and suggested the Sub-Committee delegate authority to the Town Clerk representing the Local Planning Authority, in consultation with the Chair and Deputy Chair, to approve, before the prior commencement of any works, details of the materials for the rock mattress in writing, with the reason for the condition being to ensure that there was no adverse environmental or ecological impact on the River Thames or the Foreshore. The Motion was seconded.

**MOTION:** Delegate Authority to the Town Clerk representing the Local Planning Authority, in consultation with the Chair and Deputy Chair, to approve, before the prior commencement of any works, details of the materials to be used for the rock mattress in writing, with the reason for the condition being to ensure that there was no adverse environmental or ecological impact on the River Thames or the Foreshore.

The Sub-Committee agreed with the course of action suggested and, therefore, the Motion passed.

**RESOLVED – That, Members:**

- Delegated Authority to the Town Clerk representing the Local Planning Authority, in consultation with the Chair and Deputy Chair, to approve, before the prior commencement of any works, details of the materials to be used for the rock mattress in writing, with the reason for the condition being to ensure that there was no adverse environmental or ecological impact on the River Thames or the Foreshore.

The Chairman moved the meeting back to the debate on the substantive item. A Member questioned whether the use of rock was an exceptional use or not given the location and asked what the justification was as he stated he would be concerned if such a trend was to expand. Officers responded that the use of loose material that matched the riverbed was a priority and, where the angle would allow the material to rest and not be washed away immediately, loose material would be placed on top of the rock mattress so it would not be seen. The exposed area of the rock mattress was simply due to the angle that was required on a section of the foreshore and there would be some sediment that sat on top of it naturally as the river washed it in, but it would be washed back out. Officers added that, where that did not happen, loose material would be placed and a majority of the campshed would be covered in the loose material. Officers further noted that the approach was site-specific, and the question asked at the beginning of the proposal was related to where loose soil could be placed to match the repairing environment that was natural for the area.

The Chairman moved the meeting to a vote.

The Sub-Committee voted on the recommendation, subject to the Delegated Authority.

Votes were cast as follows: IN FAVOUR – 17  
OPPOSED – 0  
There were no abstentions.

**RESOLVED – That, Members agreed:**

- 1) That Planning Permission be granted in accordance with the details set out in the attached schedule.

6. **\* VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT**

The Sub-Committee received a report which detailed a list of development applications received by the Department of the Built Environment since the report to the last meeting.

**RESOLVED – That, Members:**

- Noted the report and its contents.

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

The Sub-Committee received a report which detailed a list of development and advertisement applications determined by the Chief Planning Officer and Development Director, or those so authorised under their delegated powers, since the report to the last meeting.

**RESOLVED – That, Members:**

- Noted the report and its contents.

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

There were no questions on matters relating to the work of the Sub-Committee.

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

There was no other business that the Chairman considered urgent.

**The meeting ended at 11.12 am**

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Chairman

**Contact Officer: Callum Southern**  
**Callum.Southern@cityoflondon.gov.uk**

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<b>Committee:</b>	<b>Date:</b>
Planning Applications Sub Committee	6 <sup>th</sup> May 2025
<b>Subject:</b> Montcalm Hotel, Whitbread Brewery, 52 Chiswell Street, London EC1Y 4SY  Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; and associated works.	<b>Public</b>
<b>Ward:</b> Coleman Street	<b>For Decision</b>
<b>Registered No:</b> 24/00863/FULL	<b>Registered on:</b> 13 August 2024
<b>Conservation Area:</b> The Brewery	<b>Listed Buildings:</b> Grade II* & Grade II

## Summary

Planning permission and listed building consent are sought for partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.

The proposed development is located at the Montcalm Hotel at the Brewery, which comprises a collection of listed buildings that form part of the former Whitbread Brewery complex on the southern side of Chiswell Street. The site sits on the northern boundary of the City of London, abutting the London Borough of Islington. Silk Street runs to the west of the site, Milton Street to the east with additional buildings forming the rest of the Brewery complex sitting to the south – these are used as conference and events venue which is under a separate ownership to the Hotel and are not subject to the proposals presented within this application.

The site comprises 8 listed buildings, all listed at Grade II with the exception of the Grade II\* Partners House, dated between 1700 and 1900. A further six Grade II listed buildings are located within the immediate surrounding vicinity of the site, forming the remaining elements of the Whitbread Brewery complex which are not within the site boundary. The site is also located within the Brewery Conservation Area, and sits adjacent to the Chiswell Street Conservation Area (within the London Borough of Islington) and the Barbican and Golden Lane Estates Conservation Area.

The proposed development seeks to refurbish and upgrade the hotel to retain its status as a leading heritage hotel within the City of London with an enhanced visitor experience including improved quality of accommodation, amenity offering, enhanced inclusive access and a more sustainable operation. The proposals would result in an uplift of 8 bedrooms, an increase in the total number of rooms within the Hotel from 213 to 221 alongside new and improved bar, restaurant, lounge and events space at ground floor for the public and guests to use.

As part of the proposals, an existing non-original modern brick roof extension over the eastern wing of the Hotel is to be demolished. This extension is considered to be architecturally awkward and responds poorly to the heritage assets it sits above, whilst internally the extension is not accessible for a of users, with level changes requiring navigation up and down steps and movement along narrow and disorientating corridors. Furthermore, the extension contains ad-hoc visible plant and has non-compliant fire escape routes on the fourth floor when considering present building safety standards.

A new larger 2 storey roof extension would replace these incoherent, dated additions with a compelling new architectural statement which would be clearly distinct from but compatible with the heritage assets below and the wider Brewery complex. The proposed architecture would be a striking, sophisticated contemporary statement, evocative of the industrial history of the site. Importantly, the extensions would sit as part of a wider comprehensive upgrade of the Hotel which would future-proof the operation of the hotel, enhance the sustainability credentials of the buildings, improve inclusive access and provide renewed animation and activation to Chiswell Street.

Other improvements include works to the shopfronts along Chiswell Street to improve activation and animation to provide a stronger connection between the public facing areas of the Hotel and the street; a refurbishment of guestrooms at the upper floors; creation of a new gym and meeting room facilities; and new plant. The works would reveal internal features of heritage interest such as vaulted ceilings, iron pillars and skylights which had been covered in previous unsympathetic refurbishments.

A total of 10 no. of objections have been received for the full planning application, and a total of 5 no. of objections have been received for the listed building consent application. This includes from Historic England, the Georgian Group, the Society for



the Preservation of Ancient Buildings and the City of London Conservation Area Advisory Committee. These concerns primarily relate to (but are not limited to) the appropriateness of the architectural treatment of the proposals; the bulk, scale, height and massing of the proposals; the sense of overbearing; and the impacts on the character and appearance on both the Brewery and Chiswell Street Conservation Areas; as well as noise and impact on amenity.

Officers have considered these representations and carefully afforded them considerable importance and weight. Where there is clear disagreement in the application of professional judgement, clear reasoning has been provided in this report. In response to these objections and comments and Officer feedback, the original submission was revised and amended plans and supporting documentation were received on 25th November 2024.

The amendments included alterations to the massing of the roof extension with the removal of three guestrooms to taper the building envelope to increase its set back from the building line of the heritage assets, a change in the colouration from jet black to charcoal grey to soften its appearance in addition to the inclusion of increased greening to the plant screen to provide visual contrast between the expressive roof line and plant. Furthermore, the amendments also included a strengthening of the identity of the former St Paul's Tavern Public House and an overview of general repairs to make good damaged fabric at the Hotel.

Officers consider that the proposed development would not result in any harm to the significance of the designated heritage assets that make up the site and the surroundings, whether directly through fabric alteration, or indirectly by means of visual change to their settings. Whilst clearly modern, the extension would in fact be contextual, in that it would be of an expressive, industrial architectural character that would suavely evoke the operational history of the site as a Brewery. This is that crucial context from which the buildings of the site and their significance ultimately derive. It would be clearly set back from the frontages of the listed buildings to an appropriately deferential extent and in architectural character would be clearly disassociated from them, resulting in a fascinating juxtaposition, one that would actually accentuate and more clearly define the polite frontages of the listed buildings below.

Officers consider that the proposed extension would be a confident, contextual and high-quality architectural response to the historic townscape and listed buildings within the site, the surrounds and the Brewery and Chiswell Street Conservation Areas, which would continue to be appreciated as a distinctive enclave in a dynamic area of London. The proposals would demonstrate how new additions to historic buildings need not necessarily be overly cautious or servile, but that such additions can, with the right contextual underpinning, instead possess an authenticity and spirit of their own, whilst coexisting harmoniously, even charismatically, with the historic

buildings from which they grow. This conclusion is reached whilst attributing great weight and considerable importance, to the relevant statutory tests under s.16, s.66 and s.72 of the Act.

Hotels are supported as a strategic function of the Central Activities Zone (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, dated January 2023, which identifies a demand capacity for an additional 350 rooms per annum in the City of London to 2037. It is therefore considered that the hotel's refurbishment, upgrade and provision of additional hotel bedrooms would contribute to the balance and mix of uses in the area and would offer complimentary facilities to be accessed by the public. It is considered that the proposed extension would follow a design-led approach that optimises the site capacity to accommodate growth, contribute to the Destination City objectives and would assist in the rejuvenation of the North of the City, enhancing the distinctive and mixed character of the Brewery area.

The proposals include 11 accessible guest rooms, 3 of which are in the proposed extension. This equates to 15% (rounded) of new build hotel rooms within the development being accessible aligning to the London Plan policy D5 requirement. Elsewhere in the retained part of the hotel there will be a further 8 accessible rooms, meaning that overall, 11 rooms will be accessible in total which equates to over 5%. On balance, accessibility improvements across the site are broadly consistent with policy D5 of the London Plan, Local Plan Policy DM10.8 and draft City Plan policy HL1 – when considered the constraints of the site, reducing barriers to access for a range of people wherever possible while giving great weight to the significance of heritage assets.

The application site is currently car free and will remain so with suitable delivery and servicing arrangements. There are existing on-street disabled bays provided along Milton Street adjacent to the site. The bays are restricted to blue badge holders only and is subject to a maximum stay of four hours on weekdays and overnight across the weekend. As the proposed works include limited intervention at ground floor level, including retention of the listed buildings and no changes to the external spaces across the site, there is no proposed provision of blue badge spaces. There is also no scope to include blue badge parking within the internal courtyard as the substantial majority of this space lies outside of the hotels control. There would be a suitable pick-up and drop-off point adjacent to the step-free access on Chiswell Street, and as such this is considered acceptable.

In terms of public transport provision, the site has the highest level of public transport accessibility level (PTAL) of 6B. The site is well-located for travel via public transport, including primary trips to / from the hotel and those during a guests' stay. The proposal will have minimal impact on the site access and the local highway network, as the

majority of all movements are by active and sustainable travel. Although there may be trips by vehicle for guest arrivals and departures, these are likely to be pick-up and drop-off trips by taxi, as per the existing scenario. The general means of access at the site would remain consistent with the existing layout of the site, with delivery and servicing activities accommodated via Milton Street. It is not expected that there would be a material difference in delivery and servicing frequencies, at the site when compared to the existing activities. The likely impact of the proposals would be a small increase in delivery / servicing durations, with no additional trips to be generated. The existing loading arrangements at the site would be maintained.

In regard to cycle parking, given the proposed scale of the development, it is considered that the existing provisions would be sufficient to accommodate any nominal increases in the demand for cycle parking locally. As mentioned, there is no space available within the site curtilage to provide additional cycle parking. There are dedicated on-street cycle parking spaces, e-scooter and e-bike docking stations along Milton Street.

In regard to sustainability, the proposed development would deliver a high quality, all-electric and energy efficient development that goes over and above policy requirements for minor applications and achieves more ambitious targets associated with minimum requirements for major developments. The building 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 emerging City Plan 2040 policy DE1. Additionally, the proposals meet the London Plan policy SI2 target of 35% operational carbon emission savings compared to the existing building performance in accordance with Part L 2021 and demonstrate the implementation of various measures to reduce operational energy demand, with further exploration of opportunities proposed at later design stages.

With regard to impacts on residential amenity, the daylight and sunlight assessment of the buildings assessed would not experience any noticeable reductions and would be fully compliant with the BRE guidelines. The overshadowing of the neighbouring amenity areas will be negligible and compliant with the BRE guidelines. In terms of noise impacts, residents have raised concerns that the proposed development would give rise to increased noise nuisance. A noise impact assessment has been submitted and reviewed and subject to conditions and the inclusion of the proposed acoustic mitigation measures, it is considered that resultant noise levels will be within the criteria required by the City of London and therefore the impacts of the development would not be detrimental to the amenity of the nearby residential occupiers.

The proposals are considered to be in accordance with the development plan as a whole. In addition, the Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate

otherwise. It is the view of officers that other material considerations also indicate that planning permission should be granted. Officers also consider that the application for listed building consent should be granted.

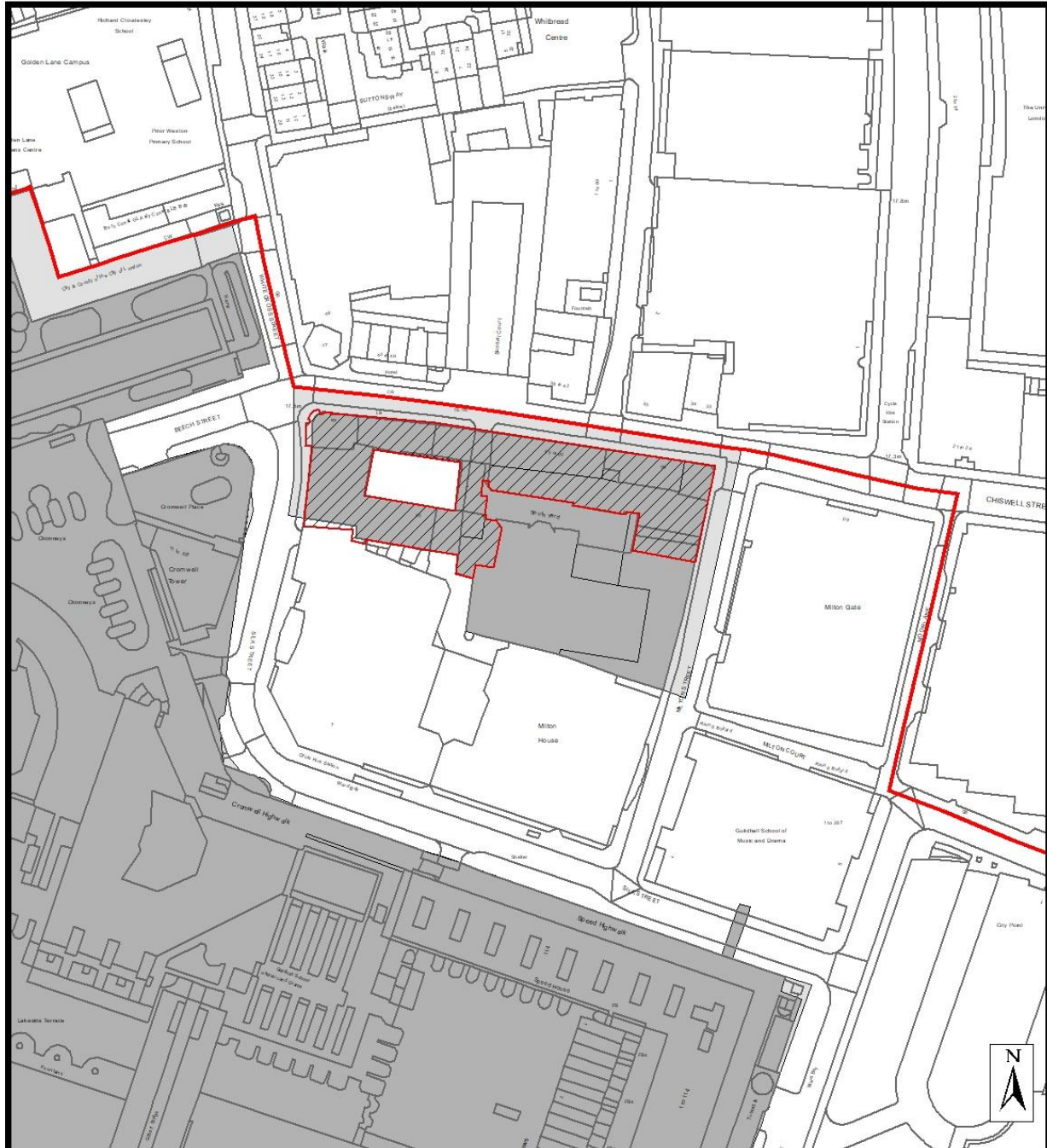
When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission and listed building consent be granted.

### **Recommendation**

(1) That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading 'Planning Obligations' 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

(2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out under the heading 'Planning Obligations' under Section 106 of the Town and Country Planning Act 1990.

# Site Location Application Plan



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ADDRESS:  
Whitbread Brewery, 52 Chiswell Street

CASE No.  
24/00863/FULL

-  **SITE LOCATION**
-  **LISTED BUILDINGS**
-  **CONSERVATION AREA BOUNDARY**
-  **CITY OF LONDON BOUNDARY**



ENVIRONMENT DEPARTMENT



**APPLICATION COVER SHEET**  
**Montcalm Hotel, Whitbread Brewery**

TOPIC	INFORMATION			
<b>1. HEIGHT</b>	<b>EXISTING</b>		<b>PROPOSED</b>	
	Tallest point: 46.172m AOD Habitable Building Tallest Height: 40.689m AOD		Tallest point: 46.172m AOD Habitable Building Tallest Height: 24.610m AOD	
<b>2. FLOORSPACE GIA (SQM)</b>	<b>USES</b>	<b>EXISTING</b>	<b>PROPOSED</b>	
	Hotel	10,471	Hotel	11,129
	<b>TOTAL</b>	<b>10,471</b>	<b>TOTAL</b>	<b>11,129</b>
			<b>TOTAL UPLIFT:</b>	<b>658</b>
<b>3. OFFICE PROVISION IN THE CAZ</b>	N/A			
<b>4. EMPLOYMENT NUMBERS</b>	<b>EXISTING</b>		<b>PROPOSED</b>	
	87 FTE employees		+8 estimated additional FTE employees 95 FTE Employees estimated	
<b>5. VEHICLE/CYCLE PARKING</b>	<b>EXISTING</b>		<b>PROPOSED</b>	
	Car parking spaces	0 spaces within the site but 2 blue badge parking spaces adjacent to the building.	Car parking spaces	0 spaces within the site but 2 blue badge parking spaces adjacent to the building.
	Cycle long stay	0 within the site. Good availability of short-stay cycle parking in the surrounding area.	Cycle long stay	0 within the site. Good availability of short-stay cycle parking in the surrounding area.
	Cycle short stay	-	Cycle short stay	-
	Lockers	71	Lockers	71
	Showers	2	Showers	2
	Changing facilities	Separate male and female	Changing facilities	Separate male and female

		changing facilities		changing facilities
6. HIGHWAY LOSS / GAIN	N/A			
7. PUBLIC REALM	N/A			
8. TREES	EXISTING		PROPOSED	
	0		0	
9. SERVICING VEHICLE TRIPS	EXISTING		PROPOSED	
	Deliveries and servicing occur from Milton Street.		Delivery and servicing arrangements retained with improved internal facilities. The likely impact of the proposals would be a small increase in delivery / servicing durations, with no additional trips to be generated. The existing loading arrangements at the site would be maintained.	
10.SERVICING HOURS	Servicing by motorised vehicles will not take place between: <ul style="list-style-type: none"><li>• 07:00 – 09:00 and</li><li>• 16:00 – 18:00.</li></ul>			
11.RETAINED FABRIC	Retained substructure – 100% by mass. Circa 90-95% of superstructure and circa 91% of façades.			
12.OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021: 70% is expected. A 70% reduction in regulated carbon emissions over the existing building is expected under Part L 2021. GLA requirement: 35% for major development proposals. However, the application is for minor development so this requirement does not apply.			
13.OPERATIONAL CARBON EMISSIONS	292,706 kgCO <sub>2</sub> /year.			
	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS			

<b>14. EMBODIED CARBON EMISSIONS</b>	<b>N/A – non-major development</b>
<b>15. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m2 GIA)</b>	<b>N/A – non-major development</b>
<b>16. WHOLE LIFE- CYCLE CARBON OPTIONS</b>	<b>N/A – non-major development</b>
<b>17. TARGET BREEAM RATING</b>	<div> <div>Good</div> <div>Very Good</div> <div>Excellent</div> <div>Outstanding</div> </div>
<b>18. URBAN GREENING FACTOR</b>	<b>N/A – non-major development</b>
<b>19. BIODIVERSITY NET GAIN</b>	<b>N/A – BNG de minimis exemption applies</b>
<b>20. AIR QUALITY</b>	<b>Air Quality Neutral with measures to improve air quality.</b>



## Existing Site Photographs



**Image 1:** The site looking from the east at the junction of Chiswell Street / Bunhill Row with Milton Gate to the left, and Cromwell Tower / 1 Silk Street in the background.



**Image 2:** Looking south towards the site, from Lamb's Passage with commercial development on Silk Street in the background.





**Image 3:** Looking west along Chiswell Street, where the site meets the junction of Silk Street & Whitecross Street



**Image 4:** Looking north along Milton Street, with the site on the left.





**Image 5:** Looking east within the South Yard, with the existing 2 storey extension visible on top of the rear block at the left.



**Image 6:** Looking west within the South Yard



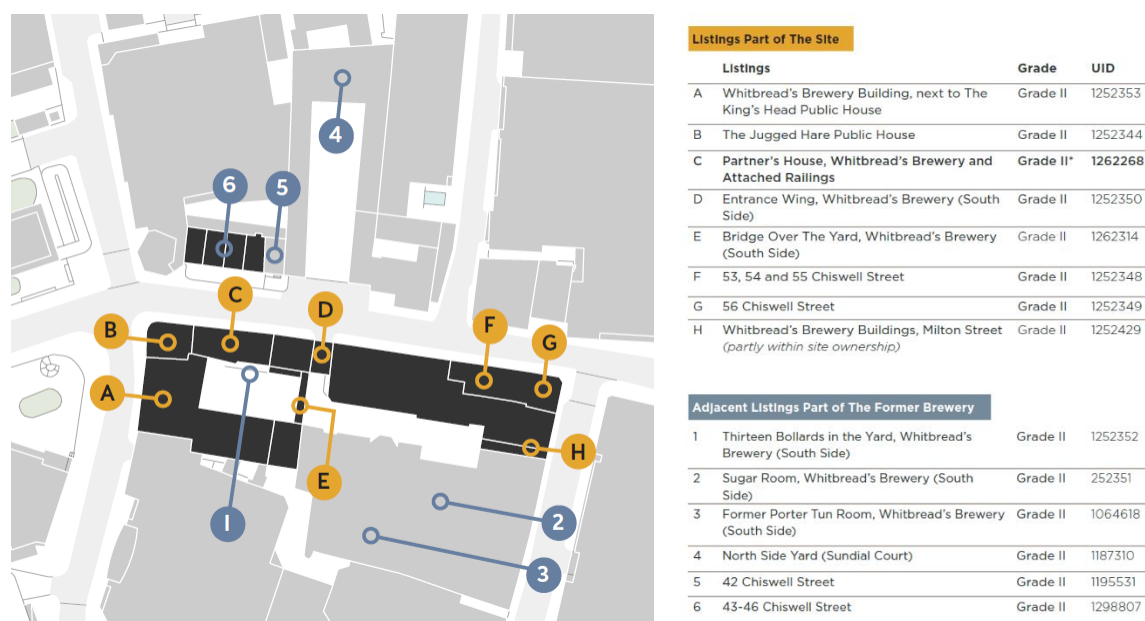
# **Main Report**

## **Introduction**

### **Site and Surroundings**

1. The proposals relate to the Montcalm Hotel at the Brewery, which incorporates a number of buildings which form part of the wider former Whitbread Brewery site located on the southern side of Chiswell Street.
2. The hotel presently occupies the northern, eastern, western and south western elements of the former Whitbread Brewery complex. The Brewery Conference venue occupies the remaining southern and south eastern elements of the former brewery and is under a separate ownership to the Hotel.
3. The site sits just within the City of London, abutting the northern boundary with the London Borough of Islington. The site is bounded by Chiswell Street to the north, Silk Street to the west, Milton Street to the east and the remainder of the former brewery to the south comprising a courtyard and former industrial buildings utilised as a conference and events venue.
4. Whitbread's brewing operations at the site date back to around 1750 and evolved and continued at the site until 1976. Whilst brewing operations stopped at the site, Whitbread continued to retain office accommodation within the buildings until 2000 when they finally vacated the site. Subsequently the office accommodation was converted to the present hotel use between 2006 and 2010. No brewing operations take place at the site today.
5. The subject site comprises 8 listed buildings set out below:
  - Partner's House and attached railings (Grade II\*)
  - Whitbread's Brewery Building – Whitecross Street (Grade II)
  - The Jugged Hare Public House (Grade II)
  - Chiswell Street Entrance Wing (Grade II)
  - Bridge over the Yard, Chiswell Street Brewery (Grade II)
  - Nos. 53, 54 & 55 Chiswell Street (Grade II)
  - Former St Paul's Tavern Public House 56 Chiswell Street (Grade II)
  - Whitbread Brewery Buildings – Milton Street (Grade II)
6. The 'Site' also sits within the Brewery Conservation Area.
7. Within the immediate vicinity of the site, six other Grade II Listed Buildings form part of the rest of the Whitbread Brewery complex which do not form part of the subject site. The elements of the former brewery which sit to the northern side of

Chiswell Street sit within the London Borough of Islington's Chiswell Street Conservation Area. Together, these assets all form group value sharing historical significance with the assets within the subject site.



**Figure 1:** The Listings that make up the Site and the wider Brewery complex.

8. The site is also within the setting of the Barbican and Golden Lane Conservation Area and the Barbican Estate Grade II Listed Building and Grade II\* Registered Historic Park and Garden.
9. The site is located within the Barbican and Golden Lane Neighbourhood Forum Area.
10. There are no other designations or constraints relevant to the Site or the proposals.

### Relevant Planning History

11. The site has an extensive planning history at the site, including several minor proposals in recent years. The most relevant applications to this application are set out below.
12. Initial proposals for a hotel use at the site were granted in 2001 and subsequently renewed in 2007. However, the renewed consents do not appear to have been implemented.
  - **0132BE** Internal and external alterations and extensions to facilitate conversion from offices (B1) and ancillary accommodation on the upper



floors of two public houses (A3) to form 117 hotel apartments (C1) with improved catering facilities and access for existing function suite and alterations to two public houses – Granted 7<sup>th</sup> September 2001.

- **06/00107/FULL & 06/00110/LBC** Renewal of previously granted planning permission 7<sup>th</sup> September 2001 application reference 01-0132BE. Internal and external alterations and extensions to facilitate conversion from offices (B1) and ancillary accommodation on the upper floors of two public houses (A4) to form 117 hotel apartments (C1) with improved catering facilities and access for existing function suite and alterations to two public houses – Granted 13<sup>th</sup> April 2006.

13. A subsequent application was submitted for hotel use, and a number of mansard extensions across the site. These consents commenced in 2008.

- **06/01134/FULL & 06/01135/LBC** Internal and external alterations and extensions in connection with the refurbishment of the existing buildings and the conversion from offices (B1) and ancillary accommodation on the upper floors of two public houses from Class A4 use to hotel use Class C1 – Granted 26<sup>th</sup> March 2007.

14. In 2010 a renewed proposal was submitted to the City, which is understood to have been carried out resulting in the situation at the site today. This application involved the conversion of the building into the hotel with 235 rooms, and included a number of roof extensions around the site – including the roof extension which is to be demolished and replaced as part of the proposals.

- **10/00587/FULL & 10/00588/LBC** Internal and external alterations, extensions, new plant enclosures and lift overruns in connection with the refurbishment of the existing buildings and the conversion from offices (B1) and ancillary accommodation on the upper floors of two public houses (A4) to hotel (C1) – Granted 18<sup>th</sup> November 2010.

### **Background to the Proposals**

15. Sana Properties Limited as the 'Applicant' (who operate the collection of Montcalm Hotels found within Central London) wish to enhance their Brewery Hotel operation, through a significant internal and external refurbishment to the listed buildings.

16. The objective of the refurbishment is to invest in and upgrade the hotel to retain its status as a leading heritage hotel located within the City of London, through an enhanced visitor experience including: quality of accommodation; amenity offering; enhanced accessibility and inclusivity; and a more sustainable operation. As part of the proposals, there would be a modest uplift of 8 bedrooms – constituting an increase in the number of bedrooms from 213 to 221.

17. The existing Hotel operation at the site is in need of significant investment to ensure it remains at the forefront of the luxury market, as the existing offer dates to 15 years ago and is not considered to meet future evolving client expectations. In addition, the plant at the Hotel needs modernisation and new internal services installations are required to improve operations including: ventilation; energy efficiency; and fire safety and to allow for easier maintenance.
18. At ground floor, the existing layout of the Hotel is complex containing significant amounts of underutilised space with disconnections between the lobby and guest amenity areas. Legibility through the spaces is unclear, whilst there is limited public offer for non-hotel users. The original plan form of the individual buildings have been diluted by unsympathetic alterations and additions. Many spaces feel disorientating in part due to the entirely lost original floor plans. In addition, many historical features including vaulted ceilings and rooflights have been concealed. There is no step-free access through the existing main entrance to the hotel, and across the ground floor there is level changes resulting from the extensive lateral links between different buildings.
19. The brick twentieth century roof extension over the eastern wing of the hotel is architecturally undistinguished and relates awkwardly to the heritage assets it sits above. It is of a meek and servile architectural character and illustrates potential for enhancement. The current situation is disharmonious, cluttered and incoherent. Internally this roof top extension is not accessible for a range of users, with level changes requiring navigation up and down steps and movement along narrow and disorientating corridors. Furthermore, the extension contains ad-hoc visible plant and has non-compliant fire escape routes on the fourth floor when considering present building safety standards.
20. As a result, the applicants have collaborated with officers to develop a heritage-led approach seeking to reinvest in the hotel and the listed buildings through unlocking, celebrating, revealing and reinstating the historic fabric where possible and removing unsympathetic modern additions. The Hotel is seeking to attract a more 'Lifestyle' market through this heritage focussed rejuvenation. The intensification of this existing use will help build on the objectives of Destination City to boost foot fall and local economic spend given its proximity to a number of attractions including the Barbican Arts Centre, Guildhall School and the future London Museum within the North of City Key Area of Change.
21. The new roof extension would replace these incoherent dated extensions with a compelling new architectural statement which would be clearly distinct but also compatible with the heritage assets below and wider site. The proposed architecture would be a striking, sophisticated contemporary statement, evocative of the light-industrial character of the site as a historic brewery.

22. The works also afford the opportunity to enhance the sustainability credentials of the hotel, improve inclusive access and provide renewed animation and activation to Chiswell Street. In addition, a number of discrete heritage benefits have been secured through the application involving the making good of damaged building fabric and reinstatement of historic signage.
23. The proposed development scheme has been subject to extensive pre-application discussions with the Local Planning Authority since March 2023. The heritage-led development proposals have evolved significantly throughout this time following feedback from City of London Officers. The proposals are a result of positive engagement between the Applicant's Design Team and CoL Officers.
24. The development proposals have changed significantly in this time throughout and following pre-application feedback from Officers. There has been a keen focus on understanding the evolution of the site, and its significance, mitigating harm and finding opportunities to better reveal the history of the site. These changes include:
- Changing the form of the rooftop extension through extensive optioneering from an uninspiring mansard roof to a distinctive contemporary piece of architecture, to reduce the bulk, height and massing of the proposal and convincingly anchor into the industrial narrative of the site;
  - Setting back the roof extension to retain historic roof forms, soften visual impact and to ensure that the prominence of the Former St Paul's Tavern is not diminished within local townscape views from the east;
  - Removal of roof top bar and pergola structures to reduce visual clutter, height and bulk in townscape views;
  - Introduction of staggered building line between the bays of the rooftop extension to break down it's form and to provide visual interest, whilst also responding to the plot widths of the historic buildings below;
  - The use of the crosshatched metalwork which the historic metalwork found within the existing complex including that of the listed bridge over the courtyard;
  - Minor design amendments to finesse the appearance of the proposal including the introduction of arched windows in the courtyard and champagne coloured window framing;
  - The inclusion of climbing plants on the plant screens to provide greening and better concealment of plant;
  - Amendments to the internal layout to enhance inclusive access including the first step-free entrance into the building, an enhanced visitor experience for a broader range of users that goes beyond paying hotel guests, and provides better animation and activation onto Chiswell Street;
  - Moving back of house functions into basement areas which are of lower heritage significance.

- The use of different colours on the shopfronts and public house in addition to providing scope for future reinstatement of historic signage on the former St Paul's Tavern; and
- The inclusion of repair works internally and externally to make good any damaged historic fabric;
- Amendments providing improved internal layouts that reinstate the original floor plans and better reveal historic features, including some which have been covered in previous unsympathetic refurbishments; and
- Improvements relating to sustainability including the introduction of Air Source Heat Pumps and enhance building operational performance to reduce emissions.

### **Application Proposals**

25. Planning Permission is sought for:

*Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; and associated works.*

26. In addition, Listed Building Consent is sought for:

*Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and associated works.*

27. The proposed scheme would provide a net uplift of 8 additional rooms, with a total of 33 guest rooms proposed in the extension. The scheme would include 11 accessible guestrooms, including 3 within the extension.

#### *Roof Extensions:*

28. The first and most significant element of the proposals is the demolition of the existing non-original part 1 and 2 storey roof extension at third and fourth level sitting above the eastern wing of the Hotel which comprises the Entrance Wing (Grade II), Nos. 53, 54 & 55 Chiswell Street (Grade II) and Whitbread Brewery South Side (Grade II). A new two storey roof top extension would be constructed, in a contemporary design with plant and building services incorporated.
29. The new 2 storey roof extension would provide 33 new guestrooms, with an uplift of 8 bedrooms - of which 3 would be accessible, which will replace rooms within the existing extension as well as guestrooms located at ground floor level which

will allow for the ground floor to be opened up to provide more active and public uses such as Food and Beverage offerings. The new extension would provide step free access throughout in addition to the creation of two means of escape – improving fire safety compliance and emergency evacuation procedures.

30. The roof extension would incorporate plant and services, enhance operational efficiencies and the sustainability credentials of the hotel with a new larger design that is both responsive to its context and architecturally distinctive in its own right.
31. Furthermore, a new area of plant is proposed to sit on top of the T Block of the Whitbread Brewery Building (Grade II) in the south west of the site.

*Chiswell Street Frontage:*

32. In addition to the works at roof level, externally, at ground floor level the proposals would introduce a new entrance on the northern elevation of the eastern wing. The works to Nos. 53, 54 & 55 Chiswell Street (Grade II) would provide inclusive step-free access directly into the Hotel for the first time in the place of an existing non-original shopfront at No. 53. Whilst the whole shopfront of No.53 would be replaced, the existing shopfronts at Nos. 54 & 55 would be refurbished with the retention of original fabric and removal of unsympathetic additions to reinstate the historic design.
33. In addition, minor works to make good damaged fabric are proposed across the complex internally and externally and the frontage of the Former St Paul's Tavern PH (Grade II) is to be refurbished with the reinstatement of the original signage.

*Internal Works:*

34. The proposals would also see the extensive refurbishment of the hotel. At ground floor level of the Eastern Wing, the proposals would remove unsympathetic non-original additions aimed at reinstating the original plan form of each of the buildings which make up the complex. This would include uncovering original historic skylights, revealing of vaulted ceilings and restoring the original cellular form of the stable block to create a new events space, and a new lounge, bar and restaurant fronting Chiswell Street. This is in addition to the creation of step-free circulation throughout the ground floor and new WCs for a range of users and luggage room.
35. Works to the ground floor of the Western Wing of the Hotel would remove guest rooms along the Chiswell Street frontage, which hinders street activation, and unsympathetic non-original additions to reinstate the original cellular floor plans of each of the buildings. The space would then be repurposed with new meeting / function rooms, break out spaces and a new gym. New accessible WCs would be

provided to serve the new function spaces. The Jugged Hare at the corner of Whitecross Street and Chiswell Street would remain unaffected by the proposals.

36. On the upper floors, all the guestrooms would be subject to an extensive upgrade with a strip out of services and risers and non-original partition walls. New enlarged service risers would be installed to provide for the necessary infrastructure upgrades to allow for a more efficient and sustainable operation, with each room refurbished. Original fabric on the upper floors has been investigated and would be retained as part of these works.

### Amended Plans

37. As a response to the objections raised by various consultees, amended plans were received on the 25<sup>th</sup> November 2024. The amendments relate to alterations to the massing, articulation and colouration of the roof extension. The key design amendments include a reduction of the massing of the roof extension with the removal of three guestrooms, with the envelope tapered to reduce its impact against the Grade II\* Partners House, and a change in the colouration from jet black to a charcoal grey to soften its impact in addition to increased greening on the plant screen to provide visual contrast between the expressive roofline and the plant.
38. Furthermore, the amendments also incorporate a strengthening of the identity of the former St Paul's Tavern PH and an overview of the general repairs proposed to make good damaged fabric of the Hotel.

### Consultation

#### **Statement of Community Involvement**

39. The Applicants have submitted a Statement of Community Involvement prepared by Concilio dated August 2024, outlining their engagement with stakeholders.
40. The programme of community engagement involved the following:
- a digital interactive consultation website
  - Engagement with locally elected representatives
  - Engagement with local stakeholders – including Culture Mile Business, Improvement District, The Barbican Association, The Barbican and Golden Lane Neighbourhood Forum, Guildhall School of Music and Drama, The Brewery, Brookfield Properties, owner and developer of 60 Chiswell Street and Berkeley Estate Asset Management, owner and developer of 48 Chiswell Street.
  - Direct liaison with residents and employees (Planners at City of London Corporation)

41. The Applicant has sought to involve the local community and stakeholders as extensively as possible as part of a transparent and collaborative engagement process.
42. This process is in addition to correspondence and communication with the City of London Corporation as part of the formal pre-application process.

### **Statutory Consultation**

43. Following receipt of the applications for planning permission and listed building consent, it has been advertised on site and in the press.
44. The application was advertised in the press on 03.09.2024 and 10.12.2024.
45. Nearby residential occupiers were notified directly of the application by letter on 02/09/2024 and 16/12/2025.
46. Site notices advertising the application were posted on 29/08/2024 and 05/11/2024.
47. At the time of publication of this report, 10 objection letters have been received for the application for Full planning and 5 letters of objections were received for the Listed Building Consent. A summary of the representations received, and the consultation responses is set out in the table below.
48. All objections and letters of support made in relation to the applications are available on the public file and have been read in full and considered in drafting this report and recommendation. Copies of all received letters and e-mails making representations are attached in full and appended to this report.

<b>Consultee Responses Summarised</b>	
Consultee	Comments for 24/00863/FULL
Environmental Health	<p>No objections subject to conditions regarding restricting noise levels, securing scheme of protection of nearby residents during demolition and construction and controlling sound and vibration from mechanical plant.</p> <p>Officer Response: Noted – these comments are addressed in the Noise and Vibration section of the report below. Conditions have been</p>



	imposed as suggested.
<p>Consultee</p> <p>Cleansing department</p>	<p>Comments for 24/00863/FULL</p> <p>The existing waste storage and collection facilities are adequate for this proposal and comply with our requirements. This Division will, therefore, raise no objections to this application.</p> <p><b>Officer Response:</b> Noted</p>
<p>Consultee</p> <p>Air Quality</p>	<p>Comments for 24/00863/FULL</p> <p>No Objections, subject to condition. The development is air quality neutral, as per GLA guidance, with the development being 'car-free' and the heating demand provided by heat pump technology. It should be noted that emissions from service and delivery vehicles are exempt from Air Quality Neutral.</p> <p><b>Officer Response:</b> Noted – these comments are addressed in the Air Quality section of the report below. Conditions have been imposed as suggested.</p>
Historic England	<p>Objection for 24/00863/FULL &amp; 24/00864/LBC Authorisation letter issued for 24/00864/LBC</p> <p><b>Initial Consultation Response Dated 16/10/24</b></p> <p><i>Summary:</i></p> <p>The site forms part of the former Whitbread Brewery, a large industrial complex that stood here for over 200 years. The listed buildings on Chiswell Street are survivors of its early Georgian establishment and Victorian redevelopment. When the brewery closed in the 1970s, the site was cleared, and the listed buildings extended to the rear at roof level. This development is visible from the street and has some harmful impacts.</p> <p>Whilst many aspects of proposals to alter and extend the listed buildings on this site do not raise issues for Historic England, the height, scale and bulk of the proposed roof extensions would, in my view, cause harm to designated heritage assets through development in their setting.</p>



	<p>Given our serious concerns about these proposals, I strongly recommend that the design approach is modified to reduce the impact of any new development on the heritage assets identified.</p> <p><i>Impacts:</i></p> <p>Although set back from the street frontage, the overall height and scale of the proposed extensions is substantially greater than the existing. The elongated sawtooth roof form means that the new rooms have greater floor to ceiling heights than the existing. Whilst the design intent is to reflect the lost industrial character, it is visually conspicuous and creates an uncomfortable contrast with the polite architecture of the listed buildings below, their orthogonal character and proportions of scale based on classical principles.</p> <p>The bulk and mass of the proposals are further emphasised by their materiality. The lower element would be fully glazed and highly conspicuous when lit at night. The dark grey and black mesh façade treatment to the upper roof element appears oppressive due to its colour, compounded by that it is relatively solid form.</p> <p>The proposed roof extensions would, therefore, starkly contrast with the coherent low rise scale of the 18th and 19th century buildings below. The bold architectural form of the proposed extension would make it a particularly overbearing presence in the context of the group of listed buildings and their homogeneous composition.</p> <p>The other internal works will have some impacts on the listed buildings but do not raise substantive matters for Historic England.</p> <p><i>Recommendation:</i></p> <p>Historic England has concerns regarding the application on heritage grounds. The proposals would cause harm to a range of designated heritage assets including several listed buildings, the Brewery and Chiswell Street Conservation Areas through development within its immediate setting.</p>
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	<p>The harm relates to the scale and bulk of the extension scheme which we consider would have an overbearing presence in views from the east along Chiswell Street towards Whitecross Street and from the north along Lamb's Passage. It will also be visible from the Barbican Podium at Ben Johnson House where its height, scale and bulk will be clearly apparent in relation to the range of listed buildings.</p> <p>We consider that the harm would be greatest to the component designations of the former Whitbread Brewery that are listed Grade II and in respect of Partners House, Grade II*. These buildings are also the heart of the Brewery Conservation Area and read in conjunction with the Chiswell Street Conservation Area to the north.</p> <p>It is the harm to local street views of Partners House that would attract the most weight due to its exceptional significance as a Grade II* listed building (NPPF, Para 205). However, it should be recognised that this is seen in the context of a wider group of Grade II listed buildings associated with the brewery and that this has collective significance. I therefore strongly recommend that the height of the proposed development is reduced so it would appear subservient to the listed buildings below.</p> <p>The NPPF also states that, if harm is unavoidable, opportunities should be sought to minimise the harm (NPPF, Paras 201 and 212). While a reduction in the height of the proposals would lower the harm to listed buildings and the Brewery Conservation Area, opportunities to reduce its overall bulk and mass, potentially with more muted façade treatments, should be explored to help reduce its impact.</p> <p><b>Subsequent Consultation Response Dated 19.12.2024 following amendments</b></p> <p>Historic England provided advice on the original application on 16 October 2024 in which I outlined our serious concerns about these proposals on heritage grounds.</p> <p>Whilst amendments have subsequently been made to the scheme, the impact of the height, scale and</p>
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	<p>bulk of the proposed roof extensions remain broadly similar. Our advice therefore remains unchanged, and I remain of the view that the development would cause harm to a range of designated heritage assets including several listed buildings, the Brewery and Chiswell Street Conservation Areas through development within its immediate setting.</p> <p>As set out in our earlier letter, the harm relates to the scale and bulk of the extension scheme which we consider would have an overbearing presence in views from the east along Chiswell Street towards Whitecross Street and from the north along Lamb's Passage. It will also be visible from the Barbican Podium at Ben Johnson House where its height, scale and bulk will be clearly apparent in relation to the range of listed buildings.</p> <p>We consider that the harm would be greatest to the component designations of the former Whitbread Brewery that are listed Grade II and in respect of Partners House, Grade II*. These buildings are also the heart of the Brewery Conservation Area and read in conjunction with the Chiswell Street Conservation Area to the north.</p> <p>It is the harm to local street views of Partners House that would attract the most weight due to its exceptional significance as a Grade II* listed building (NPPF, Para 205). However, it should be recognised that this is seen in the context of a wider group of Grade II listed buildings associated with the brewery and that this has collective significance.</p> <p><i>Recommendation:</i></p> <p>Historic England has concerns regarding the application on heritage grounds.</p> <p>We consider that the issues and safeguards outlined in our advice letter of 16 October 2024 need to be addressed in order for the application to meet the requirements of the National Planning Policy Framework. In its current form, we object to these proposals.</p> <p>Should your authority be minded to grant consent, careful consideration should be given to the</p>
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	<p>conditions associated with it to secure the design outcomes aspired to by these proposals. Careful consideration should be given in particular to materials, junction details and securing repairs to historic fabric that are set out as public benefits prior to occupancy.</p> <p><b>Officer Response:</b></p> <p><i>This is addressed within the Design &amp; Heritage Section of the report. Conditions have been attached in relation to securing design details and fabric repairs – prior to occupation of the extension.</i></p>
City of London Conservation Area Advisory Committee	<p>Objection to 24/00863/FULL only</p> <p>The Committee objected strongly to the proposal considering that the bulk, scale and mass of the addition to be over large in comparison with listed building.</p> <p>Members also considered that the design was out of keeping and that it was inappropriate and harmful to the character and appearance of the Conservation Area.</p> <p><b>Officer Response:</b></p> <p><i>This is addressed within the Design &amp; Heritage Section of the report.</i></p>
The Georgian Group Amenity Society	<p>Objection to 24/00863/FULL &amp; 24/00864/LBC</p> <p><b>Initial Consultation Response Dated 27/09/24</b></p> <p><i>Proposals and their Impact:</i></p> <p>The buildings associated with the historic Whitbread Brewery site located on the north and south of Chiswell Street create a distinctive and important group with considerable architectural and historic interest. Views within this enclave contribute to the interest of both the Brewery Conservation Area and Chiswell Street Conservation Area as the consistent scale, form and palette of materials are evident. The proposed roof extensions would be contrary to each of these characteristics causing harm to the Brewery Conservation Area and setting of the Chiswell Street Conservation Area.</p>

	<p>The views provided within the TVHIA show the impact of the proposed roof extensions on the listed buildings and their setting. This is particularly clear within views 2, 5 and 6 where the setting of the terrace is harmed, and the form of the buildings obscured. View 4 shows the impact the proposed development would have on views from the north of the site which would have historically been part of the Whitbread Brewery. Here the roof extensions appear as a dominant element, drawing the eye away from the existing built form. This similarly applies to kinetic views down Chiswell Street detracting from the ability to appreciate the distinctive character within this small enclave in the City of London.</p> <p><i>Recommendation:</i></p> <p>As the application stands there would be less than substantial harm caused to the significance of 53, 54 and 55 Chiswell Street as a group of grade II listed buildings and 56 Chiswell Street. The character and interest of the Brewery Conservation Area and the Chiswell Street Conservation Area are heavily intertwined. The roof extensions would be visible in both kinetic and static views where the scale, materiality and form would obscure and detract from the character and appearance of the Brewery Conservation Area, and the setting of the Chiswell Street Conservation Area. This harm would be less than substantial.</p> <p>The Georgian Group recommends the applications for Planning Permission and Listed Building Consent be refused by your local authority.</p> <p>In determining this application, you should bear in mind the statutory duties contained within sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.</p> <p><b>Subsequent Consultation Response Dated 23.12.2024 following amendments</b></p> <p>We acknowledge the amendments made to the proposed applications for Planning Permission and Listed Buildings, however they do not address our previous concerns.</p>
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	<p>The Group maintains its objection to the applications for Planning Permission and Listed Building Consent.</p> <p><b>Officer Response:</b></p> <p><i>This is addressed within the Design &amp; Heritage Section of the report.</i></p>
Society for the Protection of Ancient Buildings	<p>Objection to 24/00863/FULL &amp; 24/00864/LBC</p> <p><b>Initial Consultation Response Dated 02/10/2024</b></p> <p>Thank you for notifying the SPAB of the above application for alterations to this important group of listed buildings. Having reviewed the application documents, we would like to register our objection.</p> <p>The SPAB generally only comments where a building has pre-1720s origins, and it would appear from the information submitted that of the collection of listed buildings within the development site, the central five bays of Partners House is within our remit. We defer comment on proposals for the later structures to colleagues at other amenity societies.</p> <p>Partner's House is a grade II* listed building of particular architectural and historic interest. It is the only building on the site to predate the Whitbread Brewery and is believed to have been built c.1700. The two bays to the east were added in 1750 and the bays to the west, in the 19th or early 20th century. Although the majority of the building was rebuilt in 1876, some original fabric remains, including the stair which rises the full height of the building.</p> <p>We understand that the proposed roof extensions are to be situated above the eastern range of the listed buildings adjacent to Partner's House. While these extensions are not visible from street level, they are highly prominent within the streetscape and from the Barbican Podium. We consider that the dominant form of the proposed upper levels would detract from the significance of Partner's House, thereby diminishing its importance within the streetscape and causing an unjustifiable level of harm.</p>

	<p>Additionally, we note that the internal alterations to Partner's House include the removal of several doors/doorcases from the ground, first and second floors of the earliest part of the building. The significance of the fabric to be lost has not been described, however, should these interventions result in the loss of historic fabric, we would object to their removal.</p> <p>We therefore recommend that permission is refused.</p> <p><b>Subsequent Consultation Response Dated 06.01.2025 following amendments</b></p> <p>Thank you for notifying the SPAB of the additional information provide in support of the above application for alterations to this important group of listed buildings. Having reviewed the application documents, we would like to register our objection.</p> <p>We refer to our previous response of 2nd October and note that the additional information does not address the points raised.</p> <p>We therefore object to this application and recommend that it is refused.</p> <p><b>Officer Response:</b></p> <p><i>This is addressed within the Design &amp; Heritage Section of the report.</i></p>
Historic Buildings and Places	<p>Objection to 24/00863/FULL &amp; 24/00864/LBC</p> <p><b>Initial Consultation Response Dated 25/09/2024</b></p> <p>HB&amp;P do not wish to make any comments on the internal alterations and defer to Council's Conservation Officer on these matters.</p> <p>HB&amp;P do, however, wish to strongly object to the proposed roof top additions to the buildings facing Chiswell Street, which includes the grade II listed former Entrance Wing to Whitbread's Brewery and to No 50-56 Chiswell Street (including the grade II buildings which the list description identifies as being 53, 54 and 55 Chiswell Street).</p>

	<p>The Brewery Conservation Area encompasses the remaining former Whitbread's Brewery buildings on the south side of Chiswell Street. It is a small and tightly defined conservation area characterised by a close-grained townscape, consisting of varied scale, 18th and 19th century buildings set around a paved internal courtyard. The two public houses at either end of the site and the arched entrance to the courtyard provide focus and definition for the conservation area. The buildings within the conservation area are mostly listed at Grade II* or Grade II.</p> <p>While HB&amp;P recognise that the existing roof tops to 53-56 have been altered in the past, the proposed 'industrial' inspired upward addition is completely inappropriate for the host heritage assets, in terms of scale, design and materials. It is an intrusive addition and not at all sympathetic to the architectural form or nature of these Georgian and Victorian buildings.</p> <p>We strongly disagree with the claim that 'The introduction of a contrasting modern form within the context of the existing, mixed, streetscape is wholly appropriate and the listed buildings would continue to be read and understood in much the same way as they are now...' The dominance of the additions is highly distracting and harms the surviving historic streetscape, the significance and architectural interest of the heritage assets, as well as the harming the character of the conservation area.</p> <p>The application is therefore considered contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990 and the desirability of preserving the buildings and conservation area, the setting and features of special architectural and historic interest which they possess.</p> <p>Policy: Chapter 16 of the NPPF (2023), particularly paragraph 205, that 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'.</p>
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	<p>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.</p> <p>Recommendation: Withdrawal or refusal on heritage grounds.</p> <p><b>Subsequent Consultation Response Dated 19/12/2024 following amendments</b></p> <p>Thank you for notifying HB&amp;P of the amended and additional documentation submitted for the above application.</p> <p>HB&amp;P objected to the initial plans submitted for this application due to the impact the proposed roof top addition would have on the relevant listed buildings and the character of the Brewery Conservation Area. The minor changes to the setbacks and design shown in the amended plans do not alleviate those concerns and therefore HB&amp;P maintains our objection.</p> <p>As previously stated, HB&amp;P accept the principle of an appropriately scaled and designed upward extension. However, that extension must respect the architecture and historic qualities of the listed buildings and the conservation area and should not be so overtly dominant and out of character with the host heritage assets involved.</p> <p>Policy: The City of London Local Plan 2015; Policy DM 12.2 Development in conservation areas states that: 'Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area'.</p> <p>Policy DM 12.2 states that: 'In the design of new buildings or alteration of existing buildings, developers should have regard to the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale'.</p>
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	<p>This is reflected in draft policy HE1 in the draft Local Plan 2040.</p> <p>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'.</p> <p>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.</p> <p>Recommendation: Refusal for being contrary to the City of London Local Plan, the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p><b>Officer Response:</b></p> <p><i>This is addressed within the Design &amp; Heritage Section of the report.</i></p>
Council for British Archaeology	<p>Objection to 24/00863/FULL only.</p> <p><b>Initial Consultation Response Dated 25.09.2024</b></p> <p>The Whitbread Brewery is an interesting multi-phase site with high evidential and historical value. It makes a positive contribution to our understanding of the economic and architectural development of the area and is a landmark in the City of London's Brewery Conservation Area.</p> <p>The CBA do not wish to make detailed comments on the proposed internal alterations at this point. However, we object to the scale and design of the proposed upward extension to the Entrance Wing and nos. 53-56 Chiswell Street. Although the existing roof extension is modern and does not</p>

	<p>contribute to the building's historic significance, it is set back, unobtrusive and of sympathetic materials. The proposed roof extensions would be highly visible above the listed buildings and the black cladding would be entirely out of character for the surroundings. It would significantly change the aesthetic and architectural character of the listed buildings, and would cause harm to the wider Brewery Conservation area.</p> <p>We do not consider that the proposed designs meet the requirements of paras. 205 &amp; 206 of the NPPF, section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act, or Policy HE1 of the Draft City Plan. We recommend that the application is withdrawn and the plans revised.</p> <p><b>Subsequent Consultation Response Dated 19.12.2024 following amendments</b></p> <p>Thank you for notifying the Council for British Archaeology (CBA) of these revised proposals.</p> <p>We note that sections of the proposed upward extensions have been stepped back from the roofline, which slightly improves the impact on the streetscape. The colour has also been slightly amended.</p> <p>However, we still consider that the design and massing of the proposed rooftop additions are unsuitable for this historic brewery complex, and would cause harm to the building's historic significance and to the Brewery conservation area.</p> <p>The angular, minimally fenestrated design of the new structures fails to respond to the regular, polite frontages of the listed buildings on Chiswell Street, creating a jarring visual effect. The scale and massing of the proposed new structures, despite the reductions proposed by this amendment, remains overly dominant in the street scene.</p> <p>The CBA maintain our previous objection to this application. We do not consider that it meets the requirements of paras. 212 and 213 of the NPPF (as revised Dec. 2024), section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act, or Policy HE1 of the Draft City Plan. Unless considerable alterations are made to the</p>
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	<p>scale and design of the proposed upward extensions to this historic complex, we recommend that this application be refused.</p> <p><b>Officer Response:</b></p> <p><i>This is addressed within the Design &amp; Heritage Section of the report.</i></p>
London and Middlesex Archaeological Society	<p>Objection to 24/00863/FULL &amp; 24/00864/LBC</p> <p><b>Initial Consultation Response Dated 30.09.2024</b></p> <p>We object to this planning application as it would totally alter the character of the building with the associated loss of significance of the listed buildings at 53, 54, 55 and 56 Chiswell Street.</p> <p>The Whitbread Brewery on Chiswell Street was founded by Samuel Whitbread in 1750, as the country's first purpose-built mass-production brewery and was in operation for over 200 years before closing down in 1976. The site is now known as 'The Brewery', and has been converted into a corporate, party and weddings venue. The site encompasses eight Grade II and Grade II* listed buildings and is fully situated within the Brewery conservation area.</p> <p>The site holds high historical significance in that it represents an almost intact example of the Whitbread Brewery site as it would have stood before the middle of the 20th century.</p> <p>The development includes for 'a contemporary roof extension containing additional hotel bedrooms to the Entrance Wing, 53, 54, 55 and 56 Chiswell Street.' This extension will be clad in cross-hatch mesh and linear and horizontal corrugated black metal.</p> <p>Whilst it is recognised that the rooftop extension is intended to replace a modern extension, it is our opinion that the dominance of the black metal structure as seen from Chiswell Street, as shown in pages 5 and 82 of the applicants design and access statement, will create a significant negative contribution to the heritage significance of the listed buildings and their setting.</p>

	<p>We refute the statement made in para 5.10 of the Townscape, Heritage and Visual Impact Assessment: The design and language of the new extension takes its inspiration from the industrial history of the site, in particular from the angular aesthetic of the saw-toothed roof form traditionally found on the brewery buildings, as well as in its use of metal providing further industrial texture. The proposed use of profiled black sheet-metal cladding clearly introduces new materiality to the current roofscape, but with some historical precedent and justification: this part of the brewery was formerly raised and roofed in arched corrugated iron.</p> <p>Throughout its history, the brewery roofline has always consisted of mansard roofs, and at no point is there any indication of any industrial saw-tooth roofs.</p> <p>Paragraph 200 of the NPPF requires 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.</p> <p>Paragraph 202 of the NPPF requires 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.</p> <p>The City of London Local Plan 2015; Policy DM 12.2 Development in conservation areas requires that: Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.</p> <p>The Committee are of the opinion that the proposed industrial metal saw-toothed roof extension will lead to loss of significance of the listed buildings, which whilst it is recognised that such loss may be considered as less than substantial harm, such loss outweighs the negligible public benefits that would be provided.</p> <p>The Committee therefore strongly recommends that this planning application be refused.</p>
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	<p><b>Subsequent Consultation Response Dated 24.02.2025 following amendments</b></p> <p>Having reviewed the proposed amendments submitted in November 2024, we maintain our objection to this application as the impact of the height, scale and bulk of the proposed roof extensions remain broadly similar to that originally proposed and do not comply with the requirements set out in the City of London Local Plan, and the NPPF (2024).</p> <p>The application still proposes a metal saw-toothed roof extension which will be clearly visible from all aspects. As previously stated, that whilst it is recognised that the rooftop extension is intended to replace a modern extension, it remains our opinion that this will cause harm to the Grade II listed Whitbread Brewery and the Grade II* Partners' House, create a significant negative contribution to the heritage significance of the Brewery Conservation Area, and lead to loss of significance of the listed buildings in contravention of the requirements of the NPPF and City of London Local Plan as outlined below.</p> <p>Paragraph 200 of the NPPF requires 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.</p> <p>Paragraph 202 of the NPPF requires 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.</p> <p>Paragraph 212 of the NPPF (2024) requires 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.</p>
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	<p>The City of London Local Plan 2015; Policy DM 12.2 Development in conservation areas requires that: Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.</p> <p>The Committee are of the opinion that the proposed industrial metal saw-toothed roof extension will lead to loss of significance of the listed buildings and diminish the character of the Brewery Conservation Area, which whilst it is recognised that such loss may be considered as less than substantial harm, this significantly outweighs any negligible public benefits that would be provided.</p> <p>The Committee therefore maintains its objection to the applications for Planning Permission and Listed Building Consent and strongly recommends that this planning application be refused.</p> <p><b>Officer Response:</b></p> <p><i>This is addressed within the Design &amp; Heritage Section of the report.</i></p>
Association for Industrial Archaeology	<p>Objection to 24/00863/FULL only.</p> <p>The Association for Industrial Archaeology notes that this application relates to the Hotel in the former Whitbread Brewery. It includes some demolitions, alterations and extensions particularly an upward one to provided additional floorspace. There will be altered and additional entrances, some facade and internal alterations and associated works. The Whitbread Brewery site has already been subject to substantial alteration over the years, when it was a working brewery and subsequently with its partial reuse as a hotel. It is inevitable that there should be a need for further alterations to enable the Hotel to remain a successful business.</p> <p>The majority of the proposed alterations should not present any problems, such as the internal ones and even exterior ones such as entrances. However, there is one main change and that is the roof extension. The proposal is to replace the present one which is already a non-original extension. It is appreciated that the intention is that</p>

	<p>it will be clearly not an original part of the Brewery and that it may not be particularly visible, but it does not fit in with the surroundings.</p> <p>Alterations to buildings even when in their original use might be designed to fit in with the original design features or they may be designed simply to be functional for the business with no consideration given to the aesthetics of the building/site. Providing additions at this stage in a building's history provides an opportunity to ensure that they may be identifiable as a subsequent addition but also that they fit the identity of both the building's original use and history, as well as its location and therefore their visibility and effect on the surrounding area.</p> <p>Therefore although the Association only objects to the replacement upward extension. It should be designed to be both distinctive as a later addition but also fit in with the building and its surroundings.</p> <p><b>Officer Response:</b></p> <p><i>This is addressed within the Design &amp; Heritage Section of the report.</i></p>
The Gardens Trust	Did not wish to comment on the proposals.
London Borough of Islington	No response received.
Barbican Association	No response received.
Barbican and Golden Lane Neighbourhood Forum	No response received.

### Representations

Representations	Officer Response
<p><b>Relating to application no. 24/00863/FULL – Resident</b></p> <p>Welcomes the proposals to the ground floor level, but objects to the</p>	<p><i>This is addressed in the residential amenity and the Design &amp; Heritage sections of the report.</i></p>



<p>roof extension due to design, noise and impact to residential amenity.</p> <p>Disagrees with the conclusion of the Townscape, heritage and visual impact assessment and states the “contrasting modern form” mentioned in the report to describe the roof extension is “is ugly, alien and draws the eye away from the pleasing forms of the historic streetscape. This design should be rejected as inappropriate and the developers asked to rethink”.</p> <p>Concern about the noise levels of the new plant being proposed, night-time noise levels at Cromwell Tower and conditions should be attached to ensure no increased noise impacts on Cromwell Tower.</p>	
<p><b>Relating to application no. 24/00863/FULL – Resident</b></p> <p>Strongly objects to the roof extensions, due to noise levels. The night-time noise and proximity to Cromwell Tower and Ben Jonson House bedrooms would be a huge disruption. Given the track record of the Brewery with regard to noise complaints, I have no confidence in before/after monitoring in alleviating the issue.</p> <p>No objection to the ground floor proposals/new entrance</p>	<p><i>This is addressed in the residential amenity section of the report.</i></p>
<p><b>Relating to application no. 24/00863/FULL &amp; 24/00864/LBC – Resident</b></p>	<p><i>This is addressed in the Construction and Logistics, Noise and Vibration, Air quality, Sustainability, Transport, Residential Amenity and the Design &amp; Heritage sections of the report.</i></p>

<p>Commented twice, once on the original and again on the revised scheme.</p> <p>Original comment:</p> <p>Construction Management Plan The document's title is as above. However, there are no logistics, despite "Logistics" forming part of the title of the document as listed on the planning portal. Where is the map showing proposed vehicle movements for site access/egress? Also under Construction Management Plan: 3.4. Working Hours 3.4.1 07:00 to 18:00 Monday to Friday and 07:00 to 13.00 Saturday is unacceptable. 4.2. Measures Influencing Construction Vehicles and Deliveries 4.2.1. One or more Banksman/traffic marshals must be on site throughout. 4.2.3. Potential hazards must be removed forthwith. 4.2.9. Where will "turned away" vehicles go? 4.2.15. "banksman" should be "banksman/traffic marshal". There doesn't appear to be any deconstruction management plan/logistic plan. Why not? 4.6. Air Pollution, Dust and Dirt Control 4.6.2. The following measures will be implemented at the site - "where required" is too vague. Vehicles and Machinery Delivery vehicles, including HGVs must be Zero Emission compliant. Any diesel generators must be Euro VI compliant, if must one be used. 4.7 Noise &amp; Vibration Control The construction works times are different to the working hours in</p>	
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<p>3.4.1. The permitted times must be the accepted construction times but with 09.00 to 14.00 replacing 08.00 to 13.00 in both cases. No delivery times are mentioned. Why is this? Sustainable Design Statement At a meeting on 12 September at the hotel I was told by the architect that the installation of secondary glazing for the retained windows wasn't in his brief despite its energy saving and noise reduction potentials. The Banqueting House, Whitehall, has secondary glazing by Selectaglaze. According to that company, secondary glazing can reduce heat loss by up to 50% using standard glass and 65% with low-E glass. It also claims secondary glazing can also provide noise reduction in excess of 45dB. From the meeting, which was in one of the existing ground-floor meeting rooms fronting Chiswell Street, noise reduction should be a must. Interestingly, I see from 24/00947/LBC that City Corporation is seeking listed building consent to install Quattro Seal draft draught proofing treatment to windows at The Mansion House. Although using a different method, at least, City Corporation is responding positively to the need to reduce both heat loss and noise and setting an example for the Application. 5.2.3 Be Green Also at the recent meeting, I understood that there would be photovoltaic panels on the plant room roof which seems to contradict 5.2.3. Since the Application includes pitched roofs above the two additional floors – the effect of</p>	
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<p>the mass of the roof on the northern frontage could, at least, be ameliorated if PV panels were installed on it. This would give the overbearing roof a sense of purpose as well as reducing energy costs and fossil fuel use. Perhaps the “Energy Strategy” should not be to reduce energy efficiency, whether or not passively. Preliminary Ecological Appraisal As is now the norm, information re sightings of protected/notable species is taken from the free, public, GiGL data and not paid for content. As a result, some of the information on sightings is inaccurate. Table 2 Bird species recorded Isn’t the black-backed gull red listed now? 2.4.8. Other Notable Mammals Foxes, which are prevalent in the area, forage on waste food so secure storage of waste food is essential. Transport Statement. This makes no reference to the potential road closures and restrictions proposed by the Barbican, Bunhill and Golden Lane Healthy Neighbourhood Plan. This is likely to go out to public consultation with two options later this year. Either option, if implemented, will have an impact on both guests and deliveries/collections.. 4. Trip Generation 4.1. Methodology 4.1.1 Why is there no site-specific survey data? The hotel has been open for some time. Design 1. As with 45 Beech Street, and suggested in the Planning for Sustainability SPD (4. Greenhouse Gases - Key Measures for City Buildings, Whole Lifecycle Carbon), the upper floors and roof</p>	
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<p>should be constructed from CLT, with a wooden frame and cladding around the glazing panels. In the case of the Application, this form of construction should replace the steel frame with black aluminium façade and glazing panels at the first added storey level. At the second added second floor, it should replace the black cross-hatched mesh aluminium façade panels and glazing panels within champagne-coloured frames. I may have missed the details of the roof covering but a flat roof throughout the extension with PV panels would lessen the impact of the roof mass, as well as reducing energy costs and fossil fuel use; and 2. I understand all the buildings along the Chiswell Street frontage are listed Grade II but no consideration appears to have been given in the pre-application discussions to the negative effect of the mass of the roof on the significance of the listed buildings – the officers considering the roof treatment “playful” or similar. The roof treatment, which the colour does nothing to ameliorate, is also, as with 45 Beech Street, unnecessary. The design and colour is meant to replicate roofs of industrial buildings - the Brewery in particular, although any dark roof would have been single pitched longitudinally and slate. However, I can’t see, with the appearance of an enlarged fisherman’s hut on Hastings’ seafront, that it succeeds. Apart from Clarendon Court, where the colour was changed after consent,</p>	
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<p>where are there examples of buildings under black mass roofs in the Square Mile, particularly listed ones? If the roof must have such mass then the colour should be a much lighter grey, even uncoloured whether in aluminium or CLT.</p> <p>Additional comment following re-consultation:</p> <p>1. The revised roof treatment appears to be even closer to the Hastings fishermen's huts, even if a slightly lightened grey metal façade is now proposed. The loss of three rooms is obviously unwelcome but, surely, a less intrusive roof treatment isn't beyond the scope of the architects, one that recovers the lost rooms even. Certainly, a more conventional design, one which didn't pretend to take its cue from never-existent industrial buildings, could be produced;</p> <p>2. I suggested the addition of secondary-glazing for obvious environmental reasons. However, I note that the applicant's agent's covering letter of 25 November proposes a commitment to carry out works to repair (and where necessary, sympathetically replace) windows. Repairing and replacing may be necessary but the windows still won't be double-glazed so secondary-glazing will still be needed as per my original comments; and</p> <p>3. The proposed public benefits, while welcome, should be extended</p>	
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to include specific benefits for nearby residents. These could include the provision of meeting rooms, reduced rate tariffs for bedrooms, discounts for meals etc	
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### **Policy Context**

49. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan 2015 policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
50. The City of London (CoL) is preparing a new draft emerging plan, the City Plan 2040, which is currently undergoing examination in public. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan 2040 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 A to this report.
51. 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.
52. The Historic England Good Practice Advice notes, including Note 2: Managing Significance in Decision Taking in the Historic Environment and Note 3: The Setting of Heritage Assets.
53. There is relevant GLA supplementary planning guidance and other policy in respect of: Sustainable Design and Construction SPG (GLA, September 2014); Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014); London Environment Strategy (GLA, May 2018); and Shaping Neighbourhoods: Character and Context (GLA, June 2014).
54. Relevant City Corporation Guidance and SPDs including the Brewery Conservation Area Appraisal (City of London, 2000), Planning for Sustainability SPD (2025) and the City of London Lighting Strategy SPD (2023).

### **Considerations**

55. The 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, local finance considerations so far as material to the application, and to any other material considerations (Section 70 of the Town & Country Planning Act 1990); and
  - 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).
56. 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 possesses (Section 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990). This duty must be given considerable weight and importance when weighing any harm to the setting of a listed building in the balance with other material considerations.
57. In determining a planning application for a building or land in the Brewery Conservation Area, special attention must be paid to the desirability of preserving or enhancing the character or appearance of that area (Section 72(1) Planning (Listed Buildings and Conservation Areas) Act 1990).
58. In considering the application for Listed Building Consent special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Section 16(2) Planning (Listed Buildings and Conservation Areas) Act 1990).
59. 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”.
60. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social, and environmental.
61. 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:
- a) approving development proposals that accord with an up-to-date development plan without delay; or
  - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:



- the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”

62. 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 the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
  - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
63. 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, creates better places in which to live and work and helps make development acceptable to communities.”
64. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.
65. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.
66. Paragraph 208 of the NPPF sets out that Local Planning Authority 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.

67. 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."
68. Paragraph 212 of the NPPF 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."
69. Paragraph 213 sets out 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.
70. Paragraph 219 of the NPPF highlights that Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
71. The Brewery Conservation Area Appraisal 2000 describes the character and appearance and significance of the Conservation Area.

### **Main Considerations**

72. The Proposed Development is not a major development proposal as it does not comprise development in one or more categories of the definition contained in

the Town and Country Planning (Development Management Procedure) (England) Order 2015.

73. In considering these applications for planning permission and listed building consent, account has to be taken of the statutory and policy framework, the documentation accompanying the application, the updated information, the views of both statutory and non-statutory consultees responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
74. 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.
75. The principal considerations in considering the application are:
- a) The principle of intensification of hotel use the increase of hotel guest rooms and floorspace, as well as its economic impact;
  - b) The impact of the development in design and heritage terms including the special architectural and historic interest and heritage significance of the listed buildings within the site and surrounds and the character and appearance and significance of the Brewery Conservation Area and other relevant designated and non designated heritage assets;
  - c) The massing, bulk and design quality of the extensions and the impact on local townscape;
  - d) The transport and highways impact of the development ;
  - e) The impact of the development in terms of energy, sustainability and climate change;
  - f) The impact of development on ecology;
  - g) The accessibility and inclusivity of the development;
  - h) The acceptability of the scheme in terms of its environmental impacts, including, daylight and sunlight, overshadowing, noise and vibration and air quality;
  - i) The impact of the proposed development on the amenity of nearby residential and other occupiers;
  - j) The impact of the development on fire safety;
  - k) The requirement for the development to secure financial contributions and planning obligations;
  - l) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and The Human Rights Act 1998.

### **Principle of Development**

76. The site lies within the North of the City, a Key City Place as defined within Core Strategic Policy CS5 and within a rejuvenation area. Policy CS5 supports

implementing proposals for the rejuvenation, intensification and further improvement of this area. Emerging City Plan Policy S23 (10) supports additional hotel uses where appropriate and part (13) seeks improvements which enhance the special character of the area through sensitive change.

77. The site is within the Central Activities Zone (CAZ). London Plan Policy SD4 states that the strategic function of the CAZ includes tourism and hotels.
78. London Plan Policy SD4 Part E further states that in the CAZ the unique concentration and diversity of cultural, arts, entertainment, nighttime economy and tourism functions should be promoted and enhanced.
79. London Plan Policy E10 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 predominantly residential neighbourhoods and subject to 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 bedroom provision. The supporting text of Policy E10 states that it is estimated that 58,000 additional bedrooms will be required in London by 2041.
80. Local Plan Policy CS11 seeks to promote the City's cultural, and visitor offer by allowing hotels where they support the primary business or cultural role of the City and refusing new hotels where they compromise the City's business function or the potential for future business growth. Local Plan Policy DM 11.3 states that new hotel and apart-hotel accommodation will be permitted where they:
  - do not prejudice the primary business function 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 arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the 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.
81. Emerging City Plan 2040 Policy S6 seeks to promote the City's cultural, leisure and recreational offer, visitor experiences and infrastructure, and the City's

evening and weekend economies to position the Square Mile as a key cultural and leisure destination. Emerging City Plan 2040 Policy CV4 Hotels states 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 good 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 that heritage, where appropriate; and
- Address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials).

82. The Proposed Development will retain its existing land use as a hotel (Use Class C1). The proposals include an uplift in the overall floorspace of the hotel, and the number guestrooms provided. The table below illustrates the proposed changes in floorspace:

	Gross Internal Area (GIA)	Gross External Area (GEA)
Existing	10,471 sqm	12,959 sqm
Proposed	11,129 sqm	13,752 sqm
Uplift	+658 sqm	+793 sqm

83. The table below illustrates the existing and proposed room count:

	Guestrooms
Existing	213
Proposed	221
Net uplift	8

84. Revised plans were submitted on 25.11.2024 resulting in the reduction of the scale of the proposed replacement rooftop extension to 53-56 Chiswell Street. This

resulted in the reduction of the number of proposed additional hotel bedrooms to 8 and a reduction of 65 sqm in the proposed gross internal floorspace from 11,194 sqm to 11,129 sqm (GIA).

85. The proposed development which would result in a minor uplift in rooms within an existing hotel, is not considered to prejudice the primary business function of the City, as the proposed development is considered to improve the quality of the existing hotel use located in the CAZ. The development is located in a mixed-use area, comprising office, residential, retail and some hotel uses in the wider area. It is therefore considered that the proposed development would contribute to the mix of uses and it would be compatible with the character of the area, considering its proximity to significant cultural sites (i.e. the future Museum of London and the Barbican) and transport links.
86. The proposals include 11 accessible guest rooms, three of which are in the proposed extension. This equates to 15% (rounded) of new build hotel rooms within the development being accessible aligning to the London Plan policy D5 requirement. Elsewhere in the retained part of the hotel there will be a further 8 accessible rooms, through the consolidation of existing smaller substandard rooms. On balance, accessibility improvements across the site take account of policy D5 of the London Plan, Local Plan Policy DM10.8 and draft City Plan policy HL1 – considering that this is an existing hotel within buildings that are listed and taking into account the constraints of the site, reducing barriers to access for a range of people wherever possible while giving great weight to the significance of heritage assets.
87. Ensuring continued beneficial use for historic buildings, this is a design, heritage and research led scheme informed by architectural and historic significance. The design rationale preserves the essence and historic fabric of the Brewery and is directly inspired by the historical roof forms which have been previously present on the site. Importantly, the extensions sit as part of a wider comprehensive upgrade of the Hotel which would support the long-term use of the heritage assets it occupies and enhance the sustainability credentials of the hotel, improve inclusive access and provide renewed animation and activation to Chiswell Street. This is further supported in the relevant sections of the report relating to design and heritage below.
88. The impacts of the development on the highway safety and network are further assessed below in the relevant section of the report. Similarly, the impacts of the development on residential amenity are discussed below. albeit it is noted that the applicant has submitted an Operational Management Plan to minimise the impacts of the development of the amenities of the neighbouring occupiers, which is further assessed below, and its implementation will be secured by condition.

89. In light of the above, and subject to conditions and planning obligations ensuring that the development would be acceptable in terms of its impact on the highway safety and network and in terms of securing the amenity of the nearby neighbours, the principle of development would be acceptable and compliant with the London Plan policies SD4 and E10 and Local Plan policies CS11 and DM11.3.

## **Design & Heritage**

### **Policy Context**

90. The relevant policies for consideration include Policies CS10 Design, DM10.1 New Development, DM10.2 Design of green roofs and walls, DM10.5 Shopfront, DM10.8 Access and inclusive design, CS12 Historic Environment, DM12.1 Managing change affecting all heritage assets and spaces, DM12.2 Development in Conservation Areas DM12.3 and Listed Buildings, CS13 Protected Views of the Adopted Local Plan 2015; emerging Policies S8 Design, DE1 Sustainable Design, DE2 Design Quality, DE5 Shopfronts, DE8 Lighting, S11 Historic Environment, HE1 Managing Change to the Historic Environment, and S13 Protected Views of the City Plan 2040; 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 and relevant supplementary planning guidance including The Brewery Conservation Area Character Summary and City of London Protected Views SPD.
91. A total of 10 no. of objections have been received for the full planning application, and a total of 5 no. of objections have been received for the listed building consent application. This includes from Historic England, the Georgian Group, the Society for the Preservation of Ancient Buildings and the City of London Conservation Area Advisory Committee as well as other heritage organisations and third parties. These are set out in detail elsewhere in the report and in the background papers but concerns primarily relate to (but are not limited to) the appropriateness of the architectural treatment of the proposals; the bulk, scale, height and massing of the proposals; the sense of overbearing; and the impacts on the character and appearance on both the Brewery and Chiswell Street Conservation Areas.
92. Officers have considered these representations and carefully afforded them considerable importance and weight. Where there is clear disagreement in the application of professional judgement, clear reasoning has been provided in this report. In response to these objections and comments and Officer feedback, the original submission was revised and amended plans and supporting documentation were received on 25<sup>th</sup> November 2024 and these amendments are set out earlier in the report.



## **Existing Site and the Surrounding Townscape Context**

93. The application site comprises buildings located to the south of Chiswell Street, which form the northern, eastern, western and southwestern elements of the former Whitbread Brewery complex. The site is bounded by Chiswell Street to the north; Silk Street to the west; Milton Street to the east; and the Brewery Conference Venue which occupies the remaining southern and southeastern elements of the former Whitbread Brewery. The Hotel is divided into two wings - eastern and western – which are connected via the upper floors with an archway below spanning the wings and below providing pedestrian access into the courtyard, known as the South Yard, from Chiswell Street.
94. The site sits within the Brewery Conservation Area and comprises 8 different buildings and structures each with differing designs and construction dates, which are all associated with the historic Whitbread Brewery operation and have been amalgamated over time to the present situation (see Figure 1). All of the buildings are listed as Grade II, with the exception of the Partners House which is listed as Grade II\*.
95. The Hotel is at the heart of the former Whitbread Brewery complex, within a cluster of listed buildings associated with the former historic brewing use that sits on both sides of Chiswell Street. To the south of the site is the Brewery Conference Venue which occupies three Grade II listed buildings – the Sugar Room, Porter Tun Room and the remaining southern elements of the Whitbread Brewery Milton Street Buildings which are not occupied by the Hotel.
96. On the northern side of Chiswell Street, within the London Borough of Islington, is the Chiswell Street Conservation Area which contains three Grade II listed buildings which historically formed part of the Whitbread Brewery operation. Nos. 42 and 43 – 46 Chiswell Street are part of the Hotel operation, linked via a tunnel under the road, but not subject to the proposals presented in this application. The North Side Yard sits immediately opposite the site and hosts the Guildhall School's Sundial Court student accommodation.
97. Beyond the Brewery complex, the surroundings are highly varied in scale and architectural character. The buildings of the application site - modestly scaled 18<sup>th</sup> and 19<sup>th</sup> century development, between three and six storeys in height, sit as a contrast to the larger scale commercial development found further east along Chiswell Street and to the south on Silk Street. Immediately to the east of the site is the Milton Gate office development, whilst to the south commercial development on Silk Street sit prominently in the background of views of and within the site.



98. To the west of the site is the Barbican Estate, which provides a further stark contrast to the Brewery complex with its Brutalist architecture and significant scale. The townscape beyond the former Brewery complex to the north is varied in scale, hosting a mix of large commercial and residential developments interspersed with more modestly scaled traditional buildings.

### **Overarching Significance of the Whitbread Brewery**

99. The former Whitbread Brewery complex is considered to be of considerable importance as a largely intact group of buildings with a shared rich industrial heritage associated with the Whitbread Group – which continues to operate to the present day, albeit no longer brewing beer.

#### *Historic Interest:*

100. The site's association with the Whitbread Group which began brewing operations at Chiswell Street in 1749 led by Samuel Whitbread and Thomas Shewell. The Brewery was the first purpose-built mass-production brewery in the UK, and operations at the site lasted for 226 years until the business moved to a new facility in Luton on 13th April 1976. The Whitbread Group continued to have offices at the site until the turn of the millennium.
101. Initially designed for the mass production of Porter beer, the site was the largest brewery in the world by 1780, constantly at the forefront of new brewing technology. The Whitbread brand was a household name across Britain, and the site continued to be one of the largest and most aspirational and innovative British breweries through the 19th and 20th century.
102. The site saw the introduction of steam power engines in 1784, designed by the famed engineer James Watt, which enabled production at the site to massively increase to become the first brewery to produce 200,000 barrels of beer a year by 1796. In 1868, Whitbread introduced beer bottling to allow beer to be distributed across Britain.
103. Characteristically, Whitbread employed some of the leading engineers of his time and utilised the most up-to-date technology available at the site. He was also concerned that his buildings should be of high-quality construction. Such industry was rewarded with keen interest by the public and a visit to the brewery took place by King George III and Queen Charlotte in 1787.
104. At its heyday it was a packed site, brimming with activity and assortment of industrial operations which would have been noisy, fragrant, dangerous and heavy duty, all housed in variety of striking, often disconnected structures – still evident today within the South Yard and North Yard. This is a site which, through its

historic life as a brewery, constantly evolved in response to market fluctuations and technological development.

105. The Brewery suffered serious damage in air raids on the night of 29/30th December. The presence of Whitbread's own unique fire brigade located on Whitecross Street saved the Brewery from total destruction – a stark a contrast to the surrounds which were destroyed almost entirely. As such, the site provides an isolated enclave of traditional townscape, providing a glimpse into the historic character previously found within this area of London prior to the Blitz.
106. By the 1970s Whitbread began investing in larger breweries outside the capital. Chiswell Street was considered unsuitable for upgrading with the construction of the new Barbican residential development to the south and west and on the 13th of April 1976 brewing at the site ended after 226 years of operation. In 1976 plans were approved to redevelop the site, which saw the demolition of 2 acres of the Brewery to the south of the present complex and the construction of two large office blocks on the northern side of Silk Street. As such the area around the application site is the last remaining element of the Brewery.

*Architectural & Artistic Interest:*

107. The former Whitbread Brewery complex provides a characterful pocket of C18 – C19 industrial buildings of a small scale. The design of the site is unique, with the buildings of the North and South Yard both ingeniously linked underground with a tunnel running under Chiswell Street.
108. The site hosts a strong perimeter of masonry buildings and contained a variety of pitched, barrelled, hipped, pavilion and flat roof building forms intermingled with chimneys and equipment historically. Some elements of this continue to be found to the present day.
109. The design of the complex provides a clear arrangement with external elevations on Chiswell Street hosting front of house activities, offices and pubs with expressive buildings with aesthetic quality. In contrast, the industrial heart of the Brewery where the industrial production and operations sat, is located around the cobbled south yard which holds a more utilitarian character.
110. The Chiswell Street frontage is characterised by Georgian uniformity with brickwork frontages, rectangular sash windows and doorcases of a domestic scale, intermixed with the former industrial brewery buildings which sat behind in a similar restrained material palette of yellow and red brickwork, pale stone, cobbles and dark roof forms.

111. The site hosts a variety of building typologies associated with the previous brewing use – bespoke designed for different functions. This includes the stables which sat on the South Yard, chimneys and storage facilities. There was a variety of roof forms present at the site, which have evolved with the demands and needs of the site's historic brewing functions and associated operations. Some of the facilities included a 140 feet high malt store, a tun-room, two wells each 327 feet deep, two 3,000-barrel water reservoirs at roof level, a new brewhouse, three refrigerators, as well as the single span fermenting room.
112. In response to the changing demands and needs over time, many of the buildings have been extended and modified over time at the site. In 1773 a fire destroyed the old Porter Tun Room which resulted in a major programme of rebuilding and expansion. On its completion in 1784, the new Porter Tun-Room with its 65ft span King post roof had the widest timber span in London apart from Westminster Hall.
113. From 1859 to 1890 a major campaign of rebuilding and enlargement took place which saw the reconstruction of the North Yard and changes to the South Yard. The changes included alterations and additions to the buildings enclosing the yard, the construction of a new range of offices on Chiswell Street (1891), the main entrance arch with room over, and the steel-framed bridge over the yard (1892). The office range featured a large top-lit staircase in the middle, which still survives within the hotel, albeit with the roof light covered.
114. Developments in production methods continued into the twentieth century, along with further physical alterations to the buildings themselves. However, in many respects the extent of these changes was less radical than before and, consequently, the form and external appearance of much of the Chiswell Street brewery remained unaltered until the Second World War damage.
115. The domestic frontages along Chiswell Street show how the Brewery expanded at a piecemeal rate, converting previous homes into office accommodation and hosting other administrative functions supporting the business. The location of the two pubs on prominent corner plots show the intent of providing the public facing elements of the Brewery at prominent positions to serve passing custom. The architecture of the wider Whitbread brewery continues to reflect the rich colourful history of the site, and the robust buildings continue to be functional albeit in different uses.

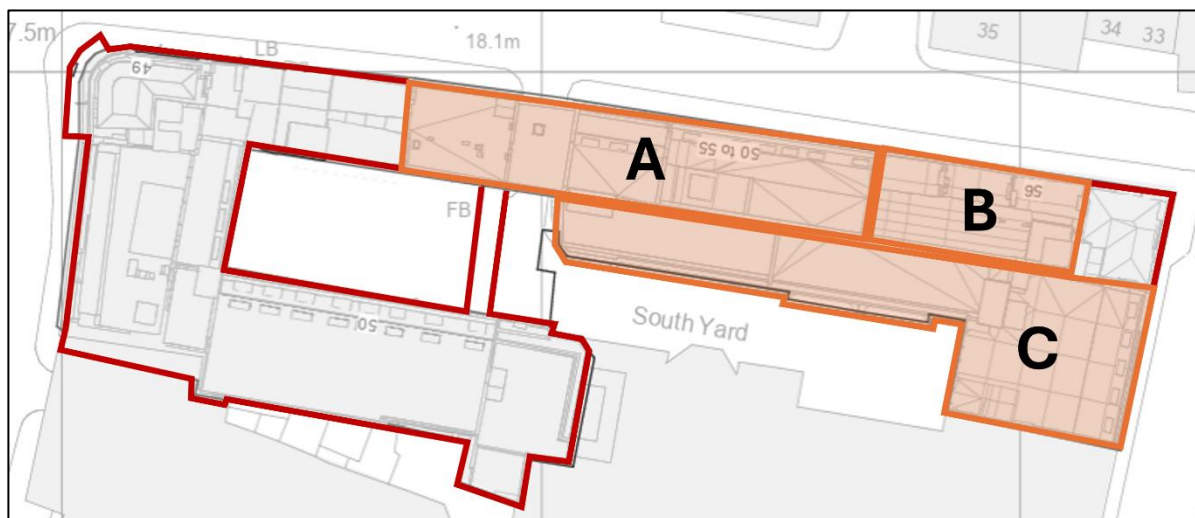
*Contribution of Setting:*

116. Beyond the confined nature of the former buildings of the Brewery complex, the setting makes a limited contribution to significance. The townscape surrounding the complex is formed of a vibrant, eclectic mix of development that shows the development of this part of the City in distinct, clear and legible phases. The

layering of large commercial buildings, the Barbican Estate gives a somewhat episodic nature to Chiswell Street as you move along it past the site. The wider area is mixed in appearance with high-density large-scale development in contrast to the tight grain of mainly listed buildings found within the complex.

### Direct & Indirect Impacts

Eastern Group: Whitbread Brewery Entrance Wing, Whitbread Brewery Buildings – Milton Street, and Nos. 53, 54 & 55 Chiswell Street (Grade II)



**Figure 2:** A) Entrance Wing, B) Nos.53, 54 & 55 Chiswell Street “The Cottages” & C) Whitbread Brewery Building’s Milton Street “The Stables” & “D Block”

#### *Significance:*

117. This group of buildings comprises three of the four listed buildings that form the eastern wing of the Hotel (excluding No.56 Chiswell Street which is discussed further down the report) and sit on the northern and eastern sides of the Brewery complex. Nos. 53, 54 & 55 Chiswell Street were listed Grade II in March 1975, following the plans to demolish part of the Brewery complex, in order to protect historic elements of interest. The Milton Street Brewery Buildings were listed as Grade II in October 1990 and the Entrance Wing listed Grade II in June 1995. All three assets share group value with the other listed buildings that form part of the wider historic Brewery complex.
118. The buildings on Chiswell Street between the Partner’s House and 53 Chiswell Street are of various dates in the 19th century and form the “Entrance Wing and Office Buildings”. They are finished in a yellow brick in Flemish bond with two to three storeys and roof extensions over a basement, the building contains an eighteen-window range along the northern elevation of the site. The entrance bay

likely dates from 1890/91, with a segmental-arched carriage entrance faced with stucco or stone with detailing and a tripartite window sitting above with shouldered architrave, panelled mullions carrying consoles, entablature and central pediment.

119. The wings either side of the entrance dating from around 1867, although the western part may incorporate some of the previous building on the site, which was a substantial five-bay house. The attic storey over the west range which extends over the entrance bay was added in the early 1960s, as a flat for Whitbread's chairman. The block was subject to an eastward extension between 1889 to 1894, providing additional office accommodation and has a simpler, yet slightly varied, fenestration language.
120. Internally, the range of buildings forming the Entrance Wing has several different characters, reflecting the different phases of the building. These include the offices of the late 1880s and a fine staircase as well as tall plain rooms, some with brick jack-arched fireproof ceilings supported on cast iron columns. To the west of the entrance, some rooms contain rich detailing, panelling and chimneypieces.
121. Nos. 53, 54 and 55 Chiswell Street "The Cottages" are the three surviving houses of a terrace of six four-storey, three bay, one-room deep houses built in the late 18th or early 19th century. Whilst these properties were in separate ownership until the late 19th century, when Whitbread Brewery purchased the properties Nos. 50, 51 and 52 they were demolished to make way for the office block which continues to sit in their place to the west of the cottages today.
122. The buildings are of Brown brick set in a Flemish bond, each of four storeys and three bays wide with the modern pitched roofs obscured by a parapet. The upper floors have a domestic character, with the upper windows containing a variety of fenestration styles dating from the 20th century with gauged brick heads and secondary glazing. The ground floors of the buildings have lost their domestic character, with shopfronts installed at the ground floor dating from the late 1970s refurbishment. No.55 had a shopfront installed earlier in the 19th century, with the original fascia, cornice and bracketed fascia stops retained in the late 70s refurbishment. The three properties have been conjoined at ground floor to form a the Chiswell Street Dining Rooms' premises with its main entrance in No. 56 (Former St. Paul's Tavern).
123. The original interiors of Nos. 53, 54 and 55 Chiswell Street have been completely stripped out although the original party walls, chimneybreasts and some of the roof structure survives.
124. The final element of the eastern wing group is the Milton Street Brewery Buildings which comprises the "D Block and Stables". Dating from the mid to late 19<sup>th</sup> Century, this building is finished in a Yellow Stock brick with a Flemish bond and

dressings of blue / white brick. The 5 bay, three storey northern element of the block which contains the arched gateway to the courtyard forms part of the site and faces onto the courtyard and Milton Street to the east. It has a fireproof structure with brick jack-arches supported on cast iron columns and beams, with vaulted cellars beneath.

125. The block was radically altered during the late 1970s renovations by the insertion of a substantial vehicle entrance arch from Milton Street into the South Yard. Internally, there is some elements of significance – particularly within the stables on the south of the site which contain brick vaulted ceilings which are presently obscured by suspended ceilings.
126. Overall, all three assets have a clear hierarchy to the frontages with the primary frontages facing onto Chiswell Street having a domestic character with efforts made to provide an enhanced aesthetic on the public facing elevation. The site has a strong relationship to the street; however, it is a layered changing piece of townscape that isn't appreciated as a whole. Internally within the South Yard, the site holds a different industrial character that is more utilitarian in nature with limited decoration reflecting its past brewing use.
127. In summary, the architectural significance of the assets derives from their external restrained facades with a orthogonal domestic character facing onto Chiswell Street reflecting their historic use as the office, business and front of house functions – whilst the rear of the group and eastern elevation reflect the industrial function of the Brewery.
128. The historic significance of the Entrance Wing and Nos.53-55 Chiswell Street relate back to their functions as the primary office base of the Whitbread brewery, once the largest in the world, whilst the Brewery Buildings on Milton Street provided the stable block and more utilitarian functions for the Brewery. The basement of the block still holds some infrastructure associated with the former Brewery use such as movement channels for barrels across store rooms.
129. Officers consider that because of the strong degree of commonality between these listed buildings with their shared history, it is appropriate and proportionate to consider them as a group in relation to the proposals, though they are individually listed.

*Setting:*

130. Setting makes a positive contribution to the significance of these assets. The principal elements of setting contributing to the significance of these listed buildings are as follows:



- Each of these individually listed buildings forms a complementary element of setting with the other, making a significant contribution to significance.
- The surrounding buildings and spaces within the wider former Brewery complex, including the Partners House, Former St Paul's Tavern PH, Jugged Hare PH, Whitbread Brewery Whitecross Street Buildings, North Side Yard, Nos. 42 – 46 Chiswell Street, Sugar Room and Porter Tun Room. All these assets complement the assets in terms of materiality but with slight variations in style and scale displaying the piecemeal growth and expansive nature of the former Brewery operation within the immediate surrounding vicinity. This makes a significant contribution to significance.
- The scale of intact brewery buildings north and south of Chiswell Street, retain the ability to communicate a clear sense of what the original setting would have looked and felt like, particularly when experienced from within the enclosed South Yard. This includes multiple elements which depict the historical industrial context behind the domestic building fronts such as the Bridge over the Yard and Chimney stack as well as the granite setts within the South Yard. The limited material palette and variety of roof forms with differing building heights provide a glimpse into the original historical industrial character. This makes a significant contribution to the significance.

131. The setting beyond the former Brewery complex has changed extensively following war time destruction and subsequent clearance and redevelopment. As such it does not make a significant contribution to the significance of the assets. The construction of modern large commercial development and the Barbican Estate, which have been constructed since the 1940s, have changed the original historic setting of the Brewery entirely. The former Brewery complex is an entirely self-contained element (including the elements to the north in the LB of Islington) and a surviving fragment of a once traditional modest scale townscape in London with a finer urban grain.

*Architecture, Detailed Proposals and Justification:*

Existing Contribution to Townscape & Site Situation

132. The existing buildings which make up this group of three designated heritage assets are considered to be positive contributors to townscape, including the Brewery Conservation Area, and positively respond to the settings of surrounding listed buildings. The buildings sit comfortably within the built context in terms of scale, massing, materiality and appearance.
133. However, the existing non-original flat roof functional extension which sits above the group is not considered to be successful owing to its insensitive, dated and unsophisticated design that diminishes the integrity of the assets and adds visual clutter. The current situation is disharmonious. Functionally the roof top extension

underperforms operationally day to day for all users due to the changes in levels, low ceilings and narrow corridors. Furthermore, the extension contains ad-hoc visible plant and has inadequate fire escape routes on the fourth floor when considering present building safety standards.

134. Internally at ground floor level, the existing layout of these assets is complex containing significant amounts of underutilised space with disconnections between the lobby and guest amenity areas. Legibility through the spaces is unclear, with limited public offer for non-hotel users. The original plan form of the buildings have been diluted by unsympathetic alterations and additions, which add to the confusion of the spaces and many historical features including vaulted ceilings and rooflights are concealed.
135. In addition to the above, there is a pressing need to upgrade the services and improve the sustainability credentials of the hotel in addition to providing a refurbishment of the building to ensure it can meet the demands and expectations of a modern hotel.

#### Roof Extension

136. Demolition works are proposed to remove the existing flat roof extension at third and fourth levels, which dates back to 2006 and does not contain any elements of heritage significance. In addition, a significant amount of plant located externally at third floor level in front of the existing roof extension would be removed. Following on from this, the new larger two storey roof extension would be constructed in its place. The new roof extension would extend further west sitting above the entire Entrance Wing, whilst the fourth floor element would extend eastward sitting above the D Block section of the Milton Street Brewery Buildings.
137. The architectural approach of the proposed roof extension has been informed by the historic industrial use of the site as a Brewery, resulting in an expressive industrial character that, crucially, would read as a layer of townscape behind the historic building frontages along Chiswell Street. The proposed roof top extension would take the form of a lightweight contemporary addition with a striking angular geometry, inspired by light industrial architecture to evoke the light industry of the former Brewery use, and this would be juxtaposed with, but be distinctively set back from, the traditional architecture of the historic building grouping preserving scale, facades and historic roof forms. The result would be a legible and clear piece of architecture, distinct from the listed buildings but complimentary to them, with its own inner authenticity and spirit.
138. The disposition of the final massing, bulk and overall expression of the proposed roof extension has been carefully considered in relation to key townscape views,



with particular regard given to those along Chiswell Street. This is discussed further in the heritage impact section of this report.

139. The proposed rooftop extension would be formed of a trio of roof forms that have each been inspired by the industrial origins of the site, creating a meaningful design narrative which seeks to reflect the industrial heritage of the site whilst respecting and highlighting the unique character and heritage of each of the existing listed buildings it sits above. The extension would take the form of an asymmetric pitched roof above The Cottages that form Nos. 53-55 Chiswell Street, whilst a sawtooth roof form would sit above the Chiswell Street Office Block. The final element of the trio would be a central pitched roof form sitting above the Entrance Wing.
140. As a result, the proposal creates a group of varied profiles and apexes that rise and fall along the street creating a pleasing piece of skyline that is visually interesting and dynamic in all directions. The sculpting of the massing has broken down its form to minimise its obtrusiveness, ensuring the appropriate degree of deference, sitting behind the strongly defined historic building line below. The chamfering of the roof extension on the eastern and western sides of the roof extension would be particularly impactful in reducing the perceived massing of the proposal in views along Chiswell Street from the west and east.
141. In addition, the building line of the proposed roof extension's northern elevation is stepped to help further break down the massing and ensuring that the proposal does not appear monotonous nor overbearing. The proposal would appear as a varied group of 3 bays, with the building line tapered to help soften its visual impact whilst further articulating the proposal. The stepped building line would further accentuate the individuality of the plots and facades below.
142. On the rear southern elevation, the proposed roof extension would rise flush with the existing building line facing onto the South Yard. The trio of roof forms would be reflected within this elevation. On the eastern element of the roof extension – sitting above the D Block – the roof extension would rise flush on the western building line, with a pitched roof form. On the eastern frontage, this element of the extension would be set back from the front building line of the D Block facing onto Milton Street.
143. The total increase in the bulk and height of the proposed building is considered to be moderate and would maintain a commensurate scale with the surrounding townscape. The proposed roof extension is modestly scaled when viewed in the context of the wider surroundings of large commercial buildings and the Barbican Estate. The site sits within a diverse townscape with an eclectic mix of architecture with striking silhouettes sitting in the backdrop of many views of the site including Cromwell Tower and Milton Gate within the immediate surrounding vicinity. The

scale, bulk and massing of the proposed roof extension is considered to be diminutive in this wider reading of the townscape.

144. With regard to the expression and materiality of the proposals, there has been a considered approach to the design detail of the proposals which has been guided by the existing limited palette of materials found within the former Brewery complex. In addition to the buff, and elements of red, brickwork, architectural decoration within the South Yard of the former Brewery complex is mostly black metal work. Architectural motifs are limited, but the consisted cross hatch of black metal work on the bridge over the South Yard is a uniting architectural moment of the buildings.
145. The proposal would be clad in a lightweight charcoal black cross-hatch mesh metalwork that provides a expressive response to the cross hatch of the metalwork of the bridge over the South Yard. The proposed materiality would provide a rich textured finish to the extension that has depth and allows for shadows to give a varied appearance in different levels of light. Final details of the cross-hatch mesh cladding would be secured via way of condition, including details of junctions to ensure a high quality seamless finish.
146. At third floor level on the northern elevation and above the Entrance Wing on the courtyard facing southern elevation there will be a band of metal and glazed panels to provide a break between the crosshatched metalwork and the building below. This provides a subtle accent and clear separation in form and materiality between the fourth floor of the roof extension and the historic facades below. On the southern elevation facing onto the South Yard, the existing third floor buff brick wall would be rebuilt to match the existing brickwork. The fenestration pattern would follow that of the buildings below, to provide a coherent language and hierarchy below the crosshatched section at the fourth floor.
147. The windows on the northern elevation at fourth floor level would be punched into the façade to further break down the massing and articulate the building as a standalone piece of architecture. The window frames would be edged in champagne to further provide visual interest and articulation to the contemporary structure that mirrors the more expressive and decorative aesthetic language of the Chiswell Street frontages of the three assets. Final details of the windows would be secured via way of condition.
148. The frames of the windows on the southern elevation would be finished in black to reflect the more industrial and utilitarian character of the South Yard. The windows situated above the D Block would be arched to reflect the fenestration language below, to provide a more thoughtful termination to the building in views looking eastward within the yard. Integrated plant boxes would be incorporated

into the window design of the fourth floor to provide greening and visual interest to the extension on this elevation. This would be secured via way of condition.

149. The use of the darker lightweight materiality for the crown of the roof extension that would differentiate from the historic buildings below would provide a more recessive and more traditional colour appearance for roof. The darker colouration not only matches the dark metalwork found at the site, but also ensures a degree of deference. The cladding would have a metallic sheen to it, catching the light at different angles adding additional interest and depth to the building.
150. The crown of the building would also incorporate the plant with metal louvers screening equipment, ensuring a well-integrated and seamless finish in long views of the development. This would be finished in a dark grey to differentiate it from the varied roof forms in longer views from the north. The plant would then be screened further by climbing plants, providing greenery and softening its appearance. Further details of this element of the proposal are to be secured by way of condition.
151. In summary, the roof extension would result in a new visual feature with a distinctive identity that sits behind the historic townscape below. The extension would clearly be disassociated from the domestic character of the Chiswell Street frontage, but with its expressive industrial architectural character would reflect the previous operations of what was once the world's largest brewery that existed behind the modest, domestic frontage below. The result would be an arresting contrast and a confident, high-quality addition to the Brewery complex.
152. In longer views of the assets, the proposal would appear as a further layer of townscape viewed with larger commercial and residential buildings often visible beyond the roof extension. The proposed roof extension would clearly be a distinctive modern element juxtaposed to the historic fabric of the three listed buildings that established a clear architectural hierarchy and a cohesive standalone design that relates well to the site, its history and its surrounding context.

#### Alterations to Chiswell Street Shopfronts

153. At present, the public areas of the hotel are separated from the street limiting public footfall. The public have to enter the hotel via the entrance within the arch to the South Yard and pass through the hotel lobby via a long illegible route. Furthermore, there is no step free access into the hotel from Chiswell Street with wheelchair users having to travel round into the South Yard.
154. The proposals seek to reconnect the public spaces with the street and provide better animation onto Chiswell Street with enhanced active frontages through the

replacement of the non-original 20th century shopfronts. The works also afford the opportunity to provide a new step free route into the hotel directly from Chiswell Street.

155. Localised demolition of the shopfronts of No.53 and No.54 Chiswell Street would remove 20th century pastiche detailing. The original cornice and corbels on Nos.55 Chiswell Street would be retained along with this shopfront. New shopfronts would then be provided with a traditional appearance on No.53 and No.54 with a more sympathetic design to the Georgian period, yet clearly separate to one another. The new entrance, which would provide full inclusive access for all, would be provided within the centre of the shopfront of No.53. The final detailed design and methodology to these works would be secured via way of condition.

#### Internal Changes – Ground Floor

156. Internally at ground floor level, a number of alterations are proposed to this grouping of three listed buildings which have been amalgamated into the eastern wing of the hotel. The changes seek to enhance the public offering at the hotel, which is presently very limited and would help move the establishment closer to the lifestyle market and create a new destination for the public to visit in the City. In addition to revitalising the guest experience, the changes proposed would reduce the amount of level changes within the public areas of the ground floor of the hotel to enhance inclusive access to the Hotel.
157. Demolition works are proposed to remove modern wall partitions and other insensitive later additions including the toilets which are presently located along the front elevation of the building. By removing these partitions and insensitive additions, the floor space would be rationalised at ground floor level with toilets moved to the rear and the original historic cellular floor plans reinstated. The existing meeting and conference facilities would be relocated to the west wing of the hotel, allowing the ground floor of the east wing to become a focal point for the public offering hosting the bar, restaurant and lounges which allow for better engagement between the Hotel and the street.
158. In addition, over boarding around columns would be removed within the Stable Block to expose the original cast iron columns, whilst the modern plasterboard ceilings would also be removed to expose original brick vault jack arch ceiling slabs. The proposals would retain existing exposed historic fabric of interest and the skylight located above the central staircase would be uncovered allowing light through this historic feature once again. Final detailed internal elevations, floor and ceiling plans would be secured via way of condition, to ensure that all historic fabric is preserved and elements of historic interest are celebrated within the refurbishment.

159. Other works include the remodelling of Stair Core No.1 (which is not original fabric) located adjacent to the lobby space within the Entrance Wing, which will be enclosed as part of the Fire Strategy for the Hotel. In addition, an extensive refurbishment of the lobby space which has been subject to heavy alterations over time will see the removal of the modern stone flooring and granite walls. The removal of these elements not considered to be of heritage significance, would facilitate the opportunity to refurbish the lobby in a more sympathetic appearance to the heritage of the site and introduce more traditional materials such as stone flagstones.
160. A method statement would be required for demolition works, including the protection of historic fabric and a protocol should any unknown features of historic interest be discovered during the works. The methodology and work for all stages would be conditioned to be undertaken by an appropriate expert.
161. A condition has been attached to provide heritage interpretation within the lobby of the Hotel about the rich history of the Whitbread Brewery site.

#### Internal Changes – Upper Floors

162. At the upper floors (Levels 1 and 2) of the listed buildings, an extensive refurbishment of the guest rooms would take place which would follow a heritage led approach. The existing guestrooms are in need of renewal to revitalise the guest experience and meet modern demands, including improved service infrastructure.
163. As part of the upgrade to this infrastructure, the service risers would be enlarged slightly to allow for improved ventilation systems and fire stopping measures. These would improve safety standards within the hotel in addition to improving air quality and circulation. A final review of the structure of the hotel is to take place prior to these works, including a review of constraints such as the protection of historic fabric. A condition would be placed for the final detail of the extent of fabric removal associated with the new enlarged service risers to ensure historic fabric is preserved.
164. Whilst non-original partition walls would be removed a part of the works, such as around the bathrooms, within the layout original historic fabric and walls would be preserved and retained. Any unexpected discoveries during the works are to be reported to the Local Planning Authority by contractors and this would be secured via way of condition.

*Direct Heritage Impact:*

- ~~165.~~ The replacement of the existing non-original flat and undistinguished roof extension at third and fourth floor would see the removal of an unsympathetic, poor quality addition that is disjointed and fails to respond to architectural hierarchy of the historic buildings below. The removal of this existing extension would not result in any harm to the historic or architectural significance of this grouping of listed buildings below.
166. Through extensive pre-application discussions officers directed the applicants to shaping a massing and form positioned on the less sensitive non historic roof areas. The objectives were to co-create a well-designed distinct piece of architecture with an individual industrial identity which both integrated with the historic context and added a new layer to the evolution of the Brewery located in a dynamic area of the City and a Key Area of Change. The final disposition of massing was dictated by the limited space available for a roof extension owing to the narrow nature of the listed buildings it sits above, and the officer requirement that no extensions should sit above the adjoining Grade II\* Listed Partners House and Grade II No.56 Chiswell Street (Former St Paul's Tavern PH). The scheme has evolved and been scrutinised in accordance with the relevant parts of London Plan D4. The design quality will be secured through to the detailed construction stage via design conditions including samples and mock up details and the applicant design team will maintain on going involvement secured through the Section 106.
167. A number of design proposals were reviewed by officers, including traditional approaches such as mansard roof extensions. Given the constrained nature of the site, these more conventional approaches would have appeared residential, overbearing and visually dominant creating a top heavy and non-contextual proposal that would be visually intrusive and awkward as well as architecturally unsophisticated. Given the inevitable visibility of the extension, the contemporary form better allowed for any adverse impacts to be minimised through a freer approach to sculpting and stepping the massing. Ultimately this led to a series of interlinked geometric extensions which have an independence of form and expression but which could comfortably coexist with and remain deferential to the historic buildings and preserve historic fabric.
168. The contemporary approach also enabled the design rationale to be anchored in the site's historic roots. The roof forms are inspired by research and industrial imagery including the use of different roof forms inspired by the previous extensive mix of buildings which sat to the south of the collection of listed buildings, and the materiality taking cues from retained industrial pieces of architecture within the South Yard such as the Bridge Over the Yard. The resulting proposal is considered



to result in a logical design and massing rationale informed by the past industrial heritage of the site whilst sitting as an intriguing and engaging addition that does not appear overbearing on the listed buildings below.

169. Historic England and London and Middlesex Archaeological Society have identified harm to all three assets that make up this group. Historic Buildings and Places and the Council for British Archaeology have identified harm to Nos. 53, 54 & 55 Chiswell Street and the Entrance Wing, whilst the Georgian Group have only identified harm to the Nos. 53, 54 & 55 Chiswell Street within this group. Their full comments can be found within the Statutory Consultation section at the beginning of this report – in summary, concerns relate primarily to the impacts from the bulk, form, height, scale and materiality of the proposed roof extension.
170. In response to the above comments, amendments have been made to the scheme at the request of Officers. The changes have sought to reduce the scale and increase the set back of the roof extension, through the reduction of 65sq meters of Gross Internal Floorspace – equating to the loss of three guestrooms. The variation in the staggered building line of the extension has also been modified to soften its visual impact.
171. Furthermore, the tone of the extension has been lightened slightly with the integration of urban greening to the plant enclosure to soften its appearance in long views from Lamb's Passage to the north. The abovementioned consultees were reconsulted on the amended proposals, but all reiterated their objections.
172. City of London Officers reach a differing conclusion. The proposals result in a roof extension development which provides a clear juxtaposition between old and new architecture. The apex of the proposed roof extension would be only 2.62 metres higher than the highest point of the existing roof extension, so of a scale broadly commensurate with the existing situation. The architectural approach, while striking, would be contextual through its evocation of the light industrial character of the site's main history; it would, crucially, read as a new layer of the Brewery complex *behind* the listed buildings, to which it would be appropriately deferential without compromising its inner authenticity and spirit as a new addition. The overall scale of the roof extension is considered to be proportionally modest when viewed in the context of the surrounding vicinity in which it is situated, particularly when viewed from street level against a backdrop of varied and substantial commercial buildings to the east, north and south, and Cromwell Tower to the west.
173. The new roof extension also incorporates plant into the structure, screened from views unlike the present visible ad-hoc situation, removing clutter and providing a streamline finish to the termination of the buildings.

174. The extension is architecturally audacious yet compatible with the listed buildings below given their coherent but varied domestic character as part of the northern side of the urban block which is considered sufficiently robust enough to support these additions. The historic façade composition and architectural interest of the eastern grouping would remain intact, understood and readily appreciable with the proposal sitting behind the chimney stacks of Nos. 53, 54 and 55 Chiswell Street and the mansard roof extension on the eastern element of the Entrance Wing. This positioning and set back ensures the extension is differential to historic Brewery buildings, and reads as a further layer of distinct, dissociated piece of townscape to the host buildings in views along Chiswell Street and from the north.
175. The stepping of the roof extension responds to the varied plot widths of the individual buildings below, with the differing roof forms further delineating each grouping of the listed buildings. The angled profiles of the proposals have been sculpted to fall to a lower building height on the eastern and western sides to reduce the bulk, minimising obtrusiveness and softening the appearance of the extension in longer views from the east and west. The tapering of the building line further breaks down the extension as to not appear as overbearing, heavy and monotonous on top of the assets below.
176. Historic imagery and meticulous research of the site as a Brewery operation has been the foundation for inspiration of the architectural approach to the roof extension. Research revealed a strong perimeter of masonry buildings which contained a variety of pitched, barrelled, hipped, pavilion and flat roof building forms intermingled with chimneys and equipment. It was a hive of activity containing striking and expressive industrial buildings which defined its industrial character and functions and this is still evident today.
177. The use of black metalwork with a latticed effect would provide a degree of depth, texture and interest to the extension, inspired by the crosshatched metalwork on the Bridge within the South Yard. The glazed element below provides a bridge between the historic assets below and the contemporary addition above, with the fenestration mirroring the pattern below.
178. Giving consideration to the above, Officers disagree with the notion that the proposed extension would appear overbearing, or that would it detract from the significance of these assets. The trio of buildings would continue to be appreciated as a homogeneous composition unchallenged by the roof extension, successfully co-existing together as a layered piece of townscape in an area dominated by expressive architecture. The new development proposals provide a thoughtful design approach with consideration given to the rich heritage of the site.
179. With consideration to the other elements of the proposals to these assets – the updated shopfronts and internal changes – consultees have not raised any



concerns in relation to this element of the proposals. Officers consider that the proposals to uncover brick vaulted ceilings and skylights which had been obscured in previous insensitive proposals would bring heritage benefits alongside repair works making good damaged fabric. None of the internal works would result in any loss of historic fabric that is considered to be of heritage significance.

180. As such, the proposals would preserve the special architectural and historic interest of the three listed buildings within this group.

#### 56 Chiswell Street (Grade II)



**Figure 3:** 56 Chiswell Street (former St Paul's Tavern Public House)

#### *Significance:*

181. In March 1975, No. 56 Chiswell Street was listed as Grade II. The building is a former public house, known for much of its existence as the St Paul's Tavern, which closed in 2008 and reopened in 2011 as the Chiswell Street Dining Rooms which serves as the Hotel's restaurant. Originally dating from the 18th century, the pub was likely rebuilt with elaborate plaster window surrounds, cornice and parapets around the 1840s whilst the frontage at ground floor level is a modern reproduction.
182. The building is finished in a brown brick in a Flemish bond and rises four storeys over a basement sitting prominently on the north eastern corner of the site addressing both Chiswell Street and Milton Street highlighting the historic importance of the public house serving passing trade on both of these routes which would have been busy thoroughfares in C18 / C19. The upper floors each have four bays on each elevation, with flat arched windows and moulded stucco architraves – at first floor level the windows have distinctive cornices on consoles and stucco panels above linking to the sills of the second floor windows. Some of the windows facing onto Milton Street are blank with brick infills. At third floor the

windows benefit from bracketed sills. A central raised panel is located to either front of the pub flanked by scrolled consoles.

183. The asset shares group value with the other listed buildings that form the wider historic Brewery complex and its significance principally derives from both its architectural and historic value. The pub was one of the public facing components of Whitbread's brewery. There are no internal historic features of interest within this asset at ground floor, which has been heavily altered.

*Setting:*

184. Setting is considered to make a positive contribution to this asset, and the principal elements of setting that contributes to its significance are as follows:
- The asset shares group value with the other buildings within the urban block that forms the wider Brewery complex including Nos. 53, 54 & 55 Chiswell Street, Whitbread Brewery Buildings on Milton Street, Whitbread Brewery Entrance Wing, Partners House, Jugged Hare PH, Whitbread Brewery Buildings by Kings Head PH, Sugar Room, Porter Tun Room, North Side Yard and Nos. 42 – 46 Chiswell Street. All these assets complement the asset in terms of materiality but with slight variations in style and scale displaying the piecemeal growth and expansive nature of the former Brewery operation within the immediate surrounding vicinity. This makes a significant contribution to significance.
  - The location of the former public house positioned on the corner, bookends the group of the Brewery buildings that form the urban block with another public house, The Jugged Hare. The prominent positions of the functional elements of the Brewery on the street corners reflect the ecosystem of the historic Brewery operation and the desire to attract passing trade. This makes a significant contribution to significance.
  - The wider setting of the building beyond the Brewery site does not make any contribution to significance, including the neighbouring Milton Gate site and the commercial development on Silk Street and the Barbican.

*Direct Heritage Impact:*

185. The proposed roof extension would not directly impact this asset, as it would not sit upon the roof form of this asset. Externally, changes to this asset are limited to cosmetic changes to the fascia sign where late 20<sup>th</sup> century detailing would be removed. As part of the proposals, the applicants are exploring the opportunity to reinstate the pub signage at this asset and repainting the ground floor façade in a distinct colour to provide some variation between the former public house and the adjacent shop fronts at Nos. 53 – 55. Final details of these works are to be secured via way of condition.

186. Internally, changes are limited to cosmetic updates – all of which are considered to be acceptable as the ground floor of the pub does not contain any historic features of interest. Changes are proposed at the upper floors associated with the upgrade of guest rooms including alterations to service risers. A condition has been attached to ensure that any alterations required do not impact historic fabric.
187. Giving consideration to the above, Officers conclude that the direct impacts from the proposals would not result in any harm to this asset.

*Change within the setting of the Listed Building:*

188. Giving consideration to the indirect heritage impacts on this asset from the proposed roof extension, Historic England, the Georgian Group, Historic Buildings and Places, the Council for British Archaeology and the London and Middlesex Archaeological Society have all identified harm to this asset – primarily result from its scale, materiality, visibility and the dominance of the design with its angular nature and lack of fenestration.
189. In response to the comments, the applicants have tapered the staggered building line of the roof extension further back along the northern elevation to help soften its impact and reduce the sense of overbearing. Furthermore, the lightening of the materiality slightly has reduced the dominance of the proposed roof extension within the background of this asset.
190. Despite the changes set out, all consultees reiterated their objections. Officers again reach different conclusions in relation to this asset. As referenced in the Setting section above, within views looking westward along Chiswell Street, there are already many substantial buildings visible behind the asset including development at Silk Street and the Cromwell Tower (see HTVIA View 2 and 2A). Whilst these developments are clearly disassociated from the former Public House, it does form part of the setting where there is clear layering of townscape with larger commercial buildings and modern development being present. Furthermore, these existing buildings have differing materials to the brick masonry façade of the pub – the bush hammered concrete of Cromwell Tower and the light grey colour of 1 Silk Street both contrasting to the asset in the foreground.
191. The proposed roof extension would inevitably be visible in local views, where it sits within the background of this asset and would bring background development closer to this asset. However, the proposed contrasting materiality with a high quality, well-articulated textured metal work would not compete with the rich decorative façade of the pub which is robust enough to retain its prominence on the corner junction. This is further aided by the strong cornice with raised panels which clearly terminate the building and provides a clear separation between the historic townscape below and background development – both the proposed roof

top extension and the asset can successfully co-exist within a further layering of rich townscape.

192. Within views of this asset from the south, looking northward up Milton Street, the proposed roof extension would not interact with this asset owing to its significant setback – as demonstrated within HTVIA View 3. No amendments have been made to the roof extension on this elevation.
193. Taking into account the above and the contextual architectural approach to the roof extension led by the industrial heritage of the Brewery as detailed in the proceeding sections of the report, the proposal is considered to preserve the special architectural and historic interest and heritage significance of No. 56 Chiswell Street, including the contribution made by setting.

#### Partner's House, Whitbread Brewery and Attached Railings (Grade II\*)



**Figure 4: Partner's House**

#### *Significance:*

194. The Partners House is listed at Grade II\* and therefore has the highest degree of heritage protection on the Site and within the wider former Whitbread Brewery complex. The central five bays of the nine bay building date from around 1700, and the mid terrace building is sits alongside the other domestic facades that form the northern elevation of the site. The significance of the building is derived from its historic, architectural and evidential values.
195. The building is unique as the only part of the former Brewery complex that predates Whitbread's use of the site as a brewery, and it was adapted for use as the firm's private offices and also held accommodation for a house keeper. Finished in a red brick set in Flemish bond, of four storeys. Characteristic early

C18 features externally include the door case of panelled pilasters with carved scrolled brackets supporting a flat hood; and window frames set flush with the brickwork and the protruding timber cornice, both prohibited by the 1707 London Building Act. The tall, recessed panels which divide the windows on the upper floors are also characteristic of early 18th century houses.

196. Internally, the building has seen significant changes associated with its enlargement and adaption for different uses over time. Presently, the interior at the front of the original house dating from the C17 has a central entrance with two principal rooms and a central stair with smaller room at the rear. The stair is original and rises the full height of the building, albeit with a balustrade dating from the late C19 / early C20. Some of the rooms have timber raised and fielded panelling, but there have also been substantial alterations. The ground floor front room at the east end has a mix of panelling dating from the 18<sup>th</sup> century and some 20<sup>th</sup> century reproductions. The western part of the building contains a large room at ground floor with the boardroom above, dating from the 18<sup>th</sup> century with associated features from that period including chimneypieces with eared architrave, pulvinated frieze and cast iron grate.

*Setting:*

197. As with the other assets assessed above, setting also makes a positive contribution to this asset, and the principal elements of setting that contributes to its significance are as follows:
- The asset shares group value with the other buildings within the urban block that forms the wider Brewery complex including Nos. 53, 54 & 55 Chiswell Street, Whitbread Brewery Buildings on Milton Street, Whitbread Brewery Entrance Wing, No. 56 Chiswell Street, Jugged Hare PH, Whitbread Brewery Buildings by Kings Head PH, Sugar Room, Porter Tun Room, North Side Yard and Nos. 42 – 46 Chiswell Street. All these assets complement the asset in terms of materiality but with slight variations in style and scale displaying the piecemeal growth and expansive nature of the former Brewery operation within the immediate surrounding vicinity. This makes a significant contribution to significance.
  - The scale of intact brewery buildings north and south of Chiswell Street, retain the ability to communicate a clear sense of what the original setting would have looked and felt like, particularly when experienced from within the enclosed South Yard. This includes multiple elements which depict the historical industrial context behind the domestic building fronts such as the Bridge over the Yard and Chimney stack as well as the granite setts within the South Yard. The limited material palette and variety of roof forms with differing building heights provide a glimpse into the original historical industrial character. This makes a significant contribution to the significance.

- The Partners House sits within an established building line that is responsive to the street, with a domestic character and similar materiality but with clear individual plots and a varied parapet line. This displays the historic character and setting of Chiswell Street with buildings fronting onto the street largely built for non-brewing purposes and subsumed by the Brewery as its operations grew. This makes a significant contribution to the significance.

198. The setting beyond the former Brewery complex has changed extensively following war time destruction and subsequent clearance and redevelopment. As such it does not make a significant contribution to the significance of the asset. Large commercial development on the north side of Chiswell Street sit visibly in views of this asset from the west, whilst in views from the east Ben Jonson House in the Barbican sits prominently.

*Direct Heritage Impact:*

199. The proposed roof extension would not directly impact this asset, and the building will retain its existing roof form as part of the proposals. The primary alterations to this asset involve internal works. At ground floor level, existing ad-hoc partition walls would be removed and the original cellular floor plan of the original C17 dwelling would be retained with a more legible understanding of the spaces. The previous use of the two primary ground floor rooms would be changed from a guestroom and pantry to two new function rooms. Between the two primary rooms, the proposals would see the reinstatement of the route from the original entrance door through to the stairwell at the rear of the building, which had been dissected by unsympathetic previous interventions.

200. At the upper floors, demolition works are limited to the replacement of non-original partition bathroom walls in guestrooms and service risers. Existing service risers to the roof would be modified as part of the proposals, and conditions have been attached to ensure this does adversely impact on any historic fabric. No original fabric is lost through this element of the proposals.

201. The Society for Protection of Ancient Buildings highlight concerns in relation to the removal of several doors / doorcases from ground, first and second floors of the earliest C17 element of the building. Officers have confirmed with the applicants that all doors being removed are not original and therefore no harm would arise from these interventions.

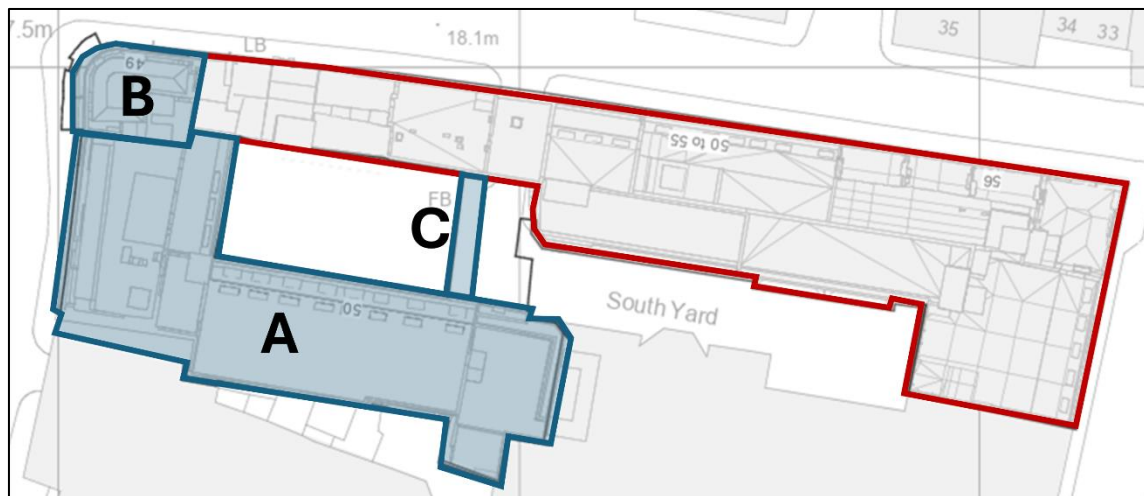
202. Giving consideration to the above, Officers conclude that the direct impacts from the proposals would not result in any harm to the significance of this asset.

*Change within the setting of the Listed Building:*



203. With regard to the indirect heritage impacts on this asset from the proposed roof extension, Historic England, the Society for the Protection of Ancient Buildings and the London and Middlesex Archaeological Society have also identified harm to this asset – primarily resulting from its visibility, the dominance of the design of the roof extension and overbearing presence. The full comments can be found within the Statutory Consultation section at the start of this report.
204. In response to the comments, the applicants have, as already described, tapered the staggered building line of the roof extension further back where it sits closest to this asset to help soften its impacts and reduce the sense of overbearing. Furthermore, the removal of the side facing window on the extension has simplified the extension by reducing visual noise and allowing the roof extension to with a greater degree of deference within the background of this asset.
205. Despite the changes above, the relevant consultees reinstated their objections. However, as explained in preceding sections, Officers take a differing view. As set out in the section above, within views of this asset looking eastward along Chiswell Street, there are already modern commercial buildings visible behind the Partners House (see HTVIA Views 5 and 6). Whilst these developments are clearly disassociated from the Partners House, it does form part of the setting where there is clear layering of townscape with larger commercial buildings and modern development being present.
206. The proposed roof extension would inevitably be visible in local views, where it sits within the background of this asset. However, the proposed development would read clearly as a layer behind the asset which benefits from a prominent termination in the form of substantial cornice. This feature provides a strong degree of separation between the industrial character of the roof extension and the domestic traditional architecture of the asset which is robust enough to cope with the addition of the roof extension without its significance being diminished. As a result of the amendments, the proposed roof extension appears more subdued and sits subordinately behind this asset – which already has a degree of background urbanisation owing to its diverse setting.
207. Taking into account the above, and the contextual architectural approach to the roof extension led by the industrial heritage of the Brewery as detailed in the proceeding sections of the report, the proposal is considered to preserve the special architectural and historic interest and heritage significance of the Partners House, including the contribution made by setting.

Western Group: Whitbread Brewery Building adjacent to Kings Head PH, The Jugged Hare Public House and Bridge over the Yard (Grade II)



**Figure 5:** A) Whitbread Brewery Building adjacent to Kings Head PH “Boiler House”, B) The Jugged Hare Public House, C) The Bridge over the Yard

*Significance:*

208. This group of buildings comprises three of the four listed buildings that form the western wing of the Hotel, excluding the Partners House discussed above. The trio sit on the western side of the former Whitbread Brewery complex. The Whitbread Brewery Building adjacent to Kings Head PH was listed as Grade II in October 1990, whilst the Jugged Hare Public House and the Bridge over the Yard were both listed in March 1975 following the plans to demolish part of the Brewery complex, in order to protect historic elements of interest. All three listed buildings share group value with the other listed buildings that form part of the wider historic Brewery complex.
209. The Jugged Hare Public House, formerly known as The Kings Head, sits on the north western corner of the site and dates from the late 19<sup>th</sup> century. The building rises to four storeys, finished in a yellow brick set in Flemish bond with dressings of gauged red brick and stucco. The timber pub frontage at ground floor is a reproduction dating from the late 20<sup>th</sup> century of an 19<sup>th</sup> century pub front.
210. The prominent corner location of the pub addressing Chiswell Street, Whitecross Street and Silk Street depicts its historic importance in attracting passing trade and acting as a node of activity – the corner location mirrors that of the other public house at the site which addresses the north eastern corner. The yellow brick contrasting to the red brick buildings either side, with the curved frontage and rich detailing including a stucco architrave and modillion cornice further emphasise the historic importance of the establishment which is architecturally celebrated. Internally, the pub is of limited heritage significance.



211. The Whitbread Brewery Building adjacent to the Kings Head PH sits to the south of the Jugged Hare and dates from 1904. The building is larger than other elements of the Brewery rising to five storeys with granite base and red brick above, holding an Edwardian style. The first and second floors are framed by six Doric pilasters supporting a bracketed dentil cornice with panelled frieze. The second floor windows are finished with a round arch, whilst above the upper storey holds a deeply recessed fenestration with a late C20 lead covered dormer running the length of the roof. The building still includes a distinctive chimney to the south with stone band, panelled frieze and bracketed cornice. The building hosted the Brewery's boiler house and fire station, whilst internally is of limited significance and the rear element of the building of no significance internally. Sitting on the former Mash Tun Room which hosted the original steam engine, it has since been rebuilt and subsequently altered significantly with a upward extension in the 1980s.
212. The final element of the group is the Bridge Over the Yard. Dating from 1892, this is a distinctive covered footbridge which connects the former offices on the northern side of the South Yard to the buildings on the southern side. The bridge has a superstructure of iron and a decorative lattice and glazed walkway. The whole structure is supported on two cast-iron columns to the north side and on a metal beam carried by two widely spaced cast-iron columns on the south side.
213. Overall, these assets show the hierarchy of frontages with the primary frontages facing onto Chiswell Street and Silk Street rich in detailing, whilst internally within the South Yard the buildings show the historic industrial character of the former Brewery – particularly the Bridge Over the Yard that provides a glimpse to the metalwork and ironmongery that would have been found within the historic brewing buildings.
214. Officers consider that because of the strong degree of commonality between these listed buildings with their shared history, it is appropriate and proportionate to consider them as a group in relation to the proposals, though they are individually listed.

*Setting:*

215. Setting makes a positive contribution to this group of assets, albeit in a limited way largely owing to the positioning of the assets immediately alongside commercial development on Silk Street and the Barbican Estate. The principal elements of setting contributing to these assets are as follows:
- Each of these individually listed buildings forms a complementary element of setting with the other, making a significant contribution to significance.

- The asset shares group value with the other buildings within the urban block that forms the wider Brewery complex including Nos. 53, 54 & 55 Chiswell Street, Whitbread Brewery Buildings on Milton Street, Whitbread Brewery Entrance Wing, No. 56 Chiswell Street, Partners House, Sugar Room, Porter Tun Room, North Side Yard and Nos. 42 – 46 Chiswell Street. All these assets complement the asset in terms of materiality but with slight variations in style and scale displaying the piecemeal growth and expansive nature of the former Brewery operation within the immediate surrounding vicinity. This makes a significant contribution to significance.
- The location of the Jugged Hare Public House positioned on the corner, bookends the group of the Brewery buildings that form the urban block with the former St Paul's Tavern Public House at 56 Chiswell Street. The prominent positions of the functional elements of the Brewery on the street corners reflect the ecosystem of the historic Brewery operation and the desire to attract passing trade. This makes a significant contribution to significance.

216. The setting to the south and west of this group of assets have largely been decontextualised with the larger development of the Barbican and commercial buildings on Silk Street. The townscape in this location lacks coherence.

*Direct Heritage Impact:*

217. The primary element of the proposals which would directly impact this group of assets is the installation of a new area of plant on the roof of the T Block, located to the rear of the Whitbread Brewery Buildings adjacent to the Kings Head PH. The proposed plant would be located on top of a non-original mansard roof extension, and is designed to follow the angle of the existing roof profile to ensure it seamlessly integrates into the host roof form and has a recessive appearance.

218. The bottom half of the plant would be an opaque plant screen that would match the crosshatched metallic cladding proposed for the roof extension on the eastern group. This ensures a cohesive architectural language is provided on all of the new roof additions across the Hotel site, which reflects the historic industrial character found within the South Yard and provides clear delineation between historic and new fabric. The upper half of the plant screen would be mesh to allow for adequate air intake and extract, with integrated planting to provide additional greening that help further soften the appearance of the plant.

219. With regards to other elements of works directly impacting the three assets that make up this group, this would be limited to internal changes to guestrooms associated with cosmetic refurbishments and service upgrades. Two guestrooms at ground floor would be removed to create a new hotel gym. None of the internal proposals would adversely impact original historic fabric nor would they impact the special historic and architectural interest of the buildings.

220. The public facing elements of the Jugged Hare Public House would not be subject to any works as part of this scheme.
221. Taking into consideration the above, Officers conclude that no harm would arise from the direct impacts of the proposals upon the three assets that make up this group.

*Change within the setting of the Listed Buildings:*

222. With regard to the indirect heritage impacts on this group of assets from the proposed roof extension, Historic England and the London and Middlesex Archaeological Society have identified harm to these assets – resulting from what they perceive to be the visibility and dominance of the design of the roof extension and overbearing presence. The full comments can be found within the Statutory Consultation section at the start of this report.
223. As set out in the above sections amendments have been made to the proposals, increasing the set back of the staggered roof line to soften the impact of the proposed roof extension and lighting the colour slightly. The consultees have reiterated their objections despite the amendments.
224. Officers do not agree with the objections from consultees in relation to this group of assets. From street level, looking eastward along Chiswell Street – as seen in HTVIA View 4 – the proposals would have a degree of separation from The Jugged Hare and Whitbread Brewery Buildings. The proposals would form part of a further layering of townscape visible above the Brewery in long views along Chiswell Street as to not appear out of character in the surrounds. In upper views of these two assets from Barbican Podium (HTVIA View 5) there is already a significant amount of urbanisation behind this group, and the proposed roof extension would not appear as visually intrusive owing to its more peripheral nature to these assets within this view.
225. Within the South Yard, the proposed roof extension would sit in close proximity to the Bridge over the Yard and the rear of the Whitbread Brewery Buildings. Whilst there would be an increase in height resulting from the extension, the proposal and its materiality would complement the existing black ironmongery found within the yard including on the Bridge Over the Yard. The materiality provides responds to the industrial heritage of the enclosed yard it shares with these assets in an contemporary and elevated to provide a coherent finish which is contextually led. The proposal would read clearly deferential in the background of views of the Bridge which would continue to sit prominently within the space as the focal point.

226. Taking into account the above, and the contextual architectural approach to the roof extension led by the industrial heritage of the Brewery as detailed in the proceeding sections of the report, the proposal is considered to preserve the special architectural and historic interest and heritage significance of the assets within this group, including the contribution made by setting.

### **Direct Impacts**

#### The Brewery Conservation Area

##### *Significance:*

227. The Brewery Conservation Area is a characterful pocket of C18 – C19 industrial brick buildings of a small scale. To Chiswell Street, it is characterised by Georgian uniformity with brickwork frontages, rectangular sash windows and doorcases. These are of a domestic scale, intermixed with the former industrial brewery buildings in a similar restrained material palette – yellow and red brickwork, pale stone, cobbles and dark slate roofs. The significance of the Conservation Area mirrors that of the former Brewery complex it encompasses within its tight boundaries and which is set out in detail in the preceding sections of this report.

##### *Contribution of Setting:*

228. The setting of the Brewery Conservation Area makes varied contributions to its significance. To the north, the adjoining Chiswell Street Conservation Area within the London Borough of Islington provides a significant contribution to the significance of the Brewery Conservation Area as it contains the remaining buildings that make up the former Whitbread Brewery complex that are not located within the City of London. The North Yard sits directly opposite the entrance to the South Yard and provides a complete composition and distinct ensemble. Of a similar scale and character, together they form a highly distinctive enclave.
229. Beyond the confined nature of the former buildings of the Brewery complex, the setting makes a limited contribution to the significance of the Conservation Area. The townscape surrounding the CA is formed of a vibrant, eclectic mix of development that shows the development of this part of the City in distinct, clear and legible phases. The layering of large commercial buildings, the Barbican Estate gives a somewhat episodic nature to Chiswell Street as you move along it. The wider area is mixed in appearance with high density large scale development in contrast to the tight grain of mainly listed buildings found within the CA.

*Impact:*

230. Historic England, the City of London Conservation Area Advisory Committee, the Georgian Group, Historic Buildings and Places, Council for British Archaeology, the London and Middlesex Archaeological Society have all identified harm arising from the proposals upon the Brewery Conservation Area. The comments can be read in full within the Statutory Consultation section at the start of the report, but to summarise concerns relate to the impact from the development in terms of its scale, form, bulk, massing, materiality and architectural character. Following the amendments detailed in the previous sections, all consultees reaffirmed their objections.
231. As referenced above, Officers take a differing view of the impact on the Conservation Area from the proposals. The Conservation Area sits in a dynamic area of the City surrounded by larger commercial modern office developments and the Barbican Estate. As a result, there is surrounding development which contrasts with the traditional, low rise and modest scale development of the Conservation Area thus enhancing the significance and appreciation of it as a unique enclave.
232. The proposed roof extension sitting above the eastern wing of the hotel would introduce additional height and massing above the roofscape of the northern elements of the Conservation Area. However, it would sit as a further layering of development sitting in front of surrounding large developments such as Cromwell Tower, 1 Silk Street and Milton Gate. The proposed roof extension would sit behind the strong but varied datum found on the traditional buildings that front the northern boundary of the Conservation Area, including their associated chimney stacks and mansard roof extensions to ensuring it is recessive and subordinate to the townscape below.
233. The proposal would appear beyond the roof line, however, owing to the robust nature of the historic buildings below, the historic townscape and Brewery complex would continue to be read as a distinct enclave of traditional townscape. Officers consider that the historic townscape can sit alongside the proposed development comfortably co-existing as two distinct elements of expressive architecture providing further layering to the episodic character along Chiswell Street which the CA sits as part of. The distinct integrity and ensemble of the collection of listed buildings that form the Conservation Area would remain and still clearly be appreciated.
234. The other elements of the proposals would not result in any significant change nor adverse impacts on the character and appearance of the Conservation Area. Taking into consideration the above, the proposals would have a neutral direct impact on the Brewery Conservation Area and would preserve its character, appearance and significance.

## Indirect Impacts

### Brewery South Side Group: Former Porter Tun Room & Chiswell Street Sugar Room (Grade II)

#### *Significance:*

235. This lies to the south of the development site and was originally part of the eastern expansion of the Brewery operation and partly enclosed the South Yard which was paved in 1777. Built in 1784 to replace the original Porter Tun Room destroyed by fire this replacement was designed to bulk store the mass production of porter within the cavernous space and the vaults below. When completed the store had a King post roof with the widest unsupported structure after Westminster Abbey and the open timber construction provided an uninterrupted view across the room and historic maps reference the uses as a “fermentation and cleansing room.” The storehouse survived the blitz and with cessation of brewing on Chiswell Street in the 1970s had multiple storage purposes and alterations including to house the 272ft Overlord Embroidery. Subsequently the building was subdivided further and now with the vaults has operated as a conference and entertainment space since the 1980s.
236. The immediately adjacent Sugar Rooms so called for the storage of brewing sugar were substantially also altered and extended in the 1980s to host luncheons. The ground and first floors to north have round-arched windows and an original timber queen post roof. As part of the change of use of this part of the Brewery site and expansion of conference and event space a new octagonal entrance pavilion was inserted in the South Yard and the Sugar Room was extended into the Yard.
237. Despite these significant changes in use, adaptation and extension the historic form of the Porter Tun Room the brown brick masonry two storey block with a five arched window range and overhanging eaves facing the yard is still evident and the King post roof survives along with the arched window range to the Sugar Room. The conference facilities retain a shared access with the Hotel from Chiswell Street via the arched passage and across the South Yard, The block is integral to the former Brewery complex and is readily understood as part of this and overall retains considerable historic and architectural values and the current uses are part of the layers of history and change which define the site and demonstrate its robust nature to adapt over times.

#### *Setting:*

238. Setting is considered to make a positive contribution to this asset, and the principal elements of setting that contributes to its significance are as follows:



- The asset shares group value with the other buildings within the urban block that forms the wider Brewery complex including the rear elevations of former Brewery buildings enclosing the site including Nos. 53, 54 & 55 Chiswell Street, Whitbread Brewery Buildings on Milton Street, Whitbread Brewery Entrance Wing and the Partners House. All these assets complement the asset in terms of materiality but with slight variations in style and scale displaying the piecemeal growth and expansive nature of the former Brewery operation within the immediate surrounding vicinity. This makes a significant contribution to significance.
- The South Yard is central to the setting and gives a clear sense of the former centre of activity framed by the office and front of house functions fronting Chiswell Street. The Bridge over the Yard and Chimney stack as well as the granite setts within the South Yard, Stable block and the granite bollards all provide visual and historic cues to the former industrial activities which the Porter Tun Room and Sugar Room housed. The limited material palette and variety of roof forms with differing building heights also provide a glimpse into the original historical industrial character. This makes a significant contribution to the significance.
- To the east and south, the building does not share a relationship in function, scale or materials with the much taller modern commercial development at Milton Gate, Milton House and Guildhall School of Music and Drama which are prominent on the boundary outside the contained site.

*Impact:*

239. With regard to the indirect heritage impacts on this group of assets from the proposed roof extension, Historic England and the London and Middlesex Archaeological Society have identified harm to these assets – resulting from the visibility and dominance of the design of the roof extension and overbearing presence. The full comments can be found within the consultation section at the start of this report and background papers.
240. As set out in the above sections amendments have been made to the proposals, increasing the set back of the staggered roof line to the Chiswell Street elevation to soften the impact of the proposed roof extension and lighting the colour slightly. The consultees have reiterated their objections despite the amendments.
241. Officers do not agree with the objections from consultees in relation to this group of assets. From within South Yard the saw tooth roof extension to the Chiswell Street elevations and the mansard extension to the Milton Street block would be a noticeable change to the setting of the Porter Tun Room and Sugar Store. Whilst there would be a noticeable change in the setting through the roof extension to adjoining blocks these increases are proportional and well-articulated and understood as additional interesting layers to the established and robust context.

The industrial inspired design preserves the character of the setting, and the design references black ironmongery found within the yard including on the Bridge Over the Yard. The extensions evoke the industrial heritage of the enclosed yard it shares with these assets in a contemporary and striking and well-conceived to provide a coherent finish which is contextually led. The proposal would read as detached from and clearly deferential to the distinct forms of the of the Porter Tun and Sugar Room which would continue to sit prominently within the Brewery complex.

242. Taking into account the above, and the contextual architectural approach to the roof extension led by the industrial heritage of the Brewery as detailed in the proceeding sections of the report, the proposal is considered to preserve the special architectural and historic interest and heritage significance of the assets within this group, including the contribution made by setting.

North of Chiswell Street Group: North Side Yard, 42 Chiswell Street & 43 – 46 Chiswell Street (Grade II)

*Significance:*

243. This grouping is located to the north of the site within LB Islington and separated by Chiswell Street but integral to the Whitbread Brewery historically and architecturally as well as physically connected via a subterranean tunnel. The North Yard enclosed on three sides by three storey buildings survives and this post-date the origins of the main Brewery site to the south. In 1866, a major reconstruction of the North Yard area began by the end of which it had acquired its present appearance. The buildings from Chiswell Street to the hop loft with vaults and Brewer's house were re-erected in 1867 as were the cooperage and various shops. The tunnel, which is still there, was built under Chiswell Street linking the growing network of underground cellars on both sides of the road. By the turn of the century the area covered by the company on the north side of Chiswell Street had reached its fullest extent, occupying virtually all the property in the rectangle bounded by Chiswell Street, Whitecross Street, Errol Street and Lamb's Passage, nearly three acres in all. The buildings have a commonality of materiality in yellow brick, diversity of roof forms, industrial features associated with the wider Brewery site. The overall original North Yard complex had a mews feel which reflected its functions. The yard is now gated and renamed Sundial Court the current use is student accommodation, and the elevations have been altered and rebuilt.
244. Nos 43-46 and 38-42 Chiswell are more homogenous and domestic in style and are typical pattern book 18th century examples of pared down four storey yellow brick terraces, two window bays wide, with a clear hierarchy of window proportions



and arched doors with fanlights set back from the streets with railings. Whilst the terrace dates from 1774 it has been significantly rebuilt. Nos 42 adjoin and sits forward but follows a similar architectural character and date with an enclosed entrance. The grouping previously accommodated offices and domestic uses associated with the Brewery site functions and is now linked to the Montcalm hotel use. The Brewers House is located to the west of the North Yard with a one window range again in yellow brick with an elliptical arch to Chiswell Street.

245. The significance is derived from the North Yard's historic and architectural values as a coherent complex of former industrial buildings straddling Chiswell Street, with a commonality of materials and building forms which still have clear associations with former industrial functions despite alterations and changes of use.

*Setting:*

246. Setting makes a positive contribution to this group of assets, albeit in a limited way largely owing to the positioning of the assets immediately alongside commercial development on Silk Street and the Barbican Estate. The principal elements of setting contributing to these assets are as follows:
247. Each of these individually listed buildings forms a complementary element of setting with the other, making a significant contribution to significance.
248. The asset shares group value with the South Yard complex on Chiswell Street including Nos. 53, 54 & 55 Chiswell Street, Whitbread Brewery Buildings on Milton Street, Whitbread Brewery Entrance Wing, No. 56 Chiswell Street and the Partners House. All these assets complement the North Yard in terms of materiality and former functions but with slight variations in style and scale displaying the piecemeal growth and expansive nature of the former Brewery operation within the immediate surrounding vicinity. This makes a significant contribution to significance. The North Yard sits directly opposite the entrance to the South Yard and forms a complete composition and distinct ensemble. This makes a significant contribution to significance.
249. The setting further to the west and east of this group of assets have largely been decontextualised with the larger development of the Barbican and commercial buildings along Chiswell Street and have little relationship with the historic buildings.

*Impact:*

250. There would be an indirect impact and noticeable change within the setting of the North Yard designated heritage assets. The saw tooth roof extension to the

Chiswell Street would have some intervisibility with the North Yard complex in views along Chiswell Street but not in dominant or adverse manner. The saw tooth roof extension to the Chiswell Street would have some intervisibility with the North Yard complex in views along Chiswell Street but neither dominant nor detract. The proposed roof extension would sit behind the strong but varied datum found on the traditional buildings that front South Yard including their associated chimney stacks and mansard roof extensions ensuring it is recessive and subordinate to the townscape below.

251. The proposal would appear beyond the roof line with its contemporary materiality, however, owing to the robust nature of the historic buildings below, the historic townscape and the wider north and south Brewery complex would continue to be read as distinct enclave of traditional townscape with an orthogonal character. Officers consider that the historic townscape can sit alongside the proposed development comfortably co-existing as two distinct elements of expressive architecture providing further layering to the episodic character along Chiswell Street. The distinct integrity and ensemble of the collection of listed buildings and the relationship between North and South Yard would remain and still clearly be appreciated and understood.
252. Taking into account the above, and the contextual architectural approach to the roof extension led by the industrial heritage of the Brewery as detailed in the proceeding sections of the report, the proposal is considered to preserve the special architectural and historic interest and heritage significance of these assets within LB Islington, including the contribution made by setting.

### Barbican Estate (Grade II)

#### *Significance:*

253. The Barbican Estate, designed by Chamberlain, Powell and Bon, is a leading example of a modernist project in the high Brutalist style, and is perhaps the seminal example nationally of a comprehensively planned, post-war, mixed-use scheme.
254. The Estate is a composition of towers and long slab blocks at raised podium level, separating pedestrians from vehicular traffic, which enclose private and public landscaped open spaces centred on a canal in a Le Corbusian manner.
255. It is of architectural interest for its compelling architectural narrative, which encapsulates the macro and micro design intent of the architects in a dramatic arrangement of buildings and spaces which are tied together by a consistent and well-detailed bush and pick-hammered finish.

256. It is of historic interest as a modern exemplar of comprehensively planned high-density urban living during the postwar recovery period delivering essential housing for the City of London, and for the associations with the architects.

*Setting:*

257. The Estate's setting varies greatly around its perimeter, where a varying range of largely modern buildings, make a neutral contribution to its significance. There are a number of tall buildings in the vicinity of the Estate which result in a highly urban skyline, however none of these hold a particular architectural or historic relationship with the Estate. As such, large modern commercial buildings of differing materiality and compositions form a well-established neutral part of the Barbican Estate's setting in this western boundary. Their scale and proximity reinforce the enclosure and segregation characteristic of the Barbican Estate, albeit in a neutral way unrelated to heritage significance.
258. The Barbican Estate is appreciated as a standalone set-piece of architectural design and execution and this is supported by the Listed Building Management Guidelines Volume II. There is little reliance on the wider surroundings to aid appreciation or an understanding of the Barbican's historic, architectural and artistic values. Exceptions to this are the Golden Lane Estate to the north and listed buildings to the south including St Giles Cripplegate and Ironmongers Livery Hall.

*Impact:*

259. The proposals would have intervisibility with the Barbican Estate both from within its setting and from views within the Estate. A varied townscape of a mix of large commercial buildings, residential development and traditional low rise townscape are an established neutral characteristic along the north eastern boundary of the Estate. Whilst the development would result in change within the setting to the east, it would not challenge the pioneering mid-20th century masterplan, architectural language or qualities which underpin the significance of the Barbican Estate and its existence as a clear entity would remain fully appreciable reference HTVIA 2, 2A and 7. It is considered that the proposals would preserve the setting and significance of the listed building.

Barbican Registered Historic Park and Garden (RHPG Grade II\*)

260. The landscape of the Barbican Estate was conceived and designed as an integral part of the architectural design by Chamberlain, Powell and Bonn with the architects recognising that the spaces between the buildings were of equal importance to the structures themselves. The landscape is now designated as a grade II\* Registered Historic Park and Garden (2003), and, along with Alexandra

Road Park, is one of only two post-war landscapes designated above Grade II within Greater London. Its heritage significance is derived from the following values:

- The creation of the Barbican as a vehicle-free environment through the raising of the precinct above ground level on the podium, creating vehicle-free space the quality and quantity of which is unparalleled in London.
- The raised ground of the podium and the high walks as an intrinsic and distinctive feature of the estate. The raised ground provides viewpoints from which to survey the surrounding city below, and, together with the limited entrances to the complex at ground level, contributes to the conception of the Barbican as fortified structure from the surrounding streets.
- The volume of space created by the concentration of built development in dense 'off-the ground' structures. These spatial reservoirs are recognised to be as significant as the buildings themselves.
- The contrast of the planning of the Barbican with the grain and plan of the surrounding townscape, and the creation of characteristically unique dramatic vistas across the estate and into the surrounding townscape.
- The richness and variety of types of external space across the estate delivered within a consistent design idiom, the scale of which is unique.
- The successful designed relationships with 'found' historic elements including the Roman and Medieval wall, and the Church of St Giles Cripplegate and associated gravestones.
- The urban character of the Barbican, and its conception and realisation as a new piece of urban fabric designed and delivered in its entirety by a single client and architect.
- The consistent use of a small number of materials and detailing across the estate, delivering a powerful sense of visual continuity and consistency to the estate.
- The impact of soft landscaping and the value of experiencing the architecture of the Barbican in the context of trees, foliage, and greenery. Originally this appears to have been intended to result from use of a restricted palette of planting in raised blocks of greenery or planter boxes which assumed an architectural significance in relation to the buildings. The layout established by Janet Jack across the upper podium employs a freer geometry and more varied planting palette.

*Setting:*

261. Due to the contained and raised conception of the Registered Historic Park and Garden, the primary setting of the landscaped gardens are the Estate buildings and historic elements within it. The enclosed nature and raised level also

segregate the wider townscape adjacent to the Barbican, aside from glimpsed views between buildings and from surrounding streets.

262. At the eastern boundary, a varied townscape with a mix of large commercial and smaller buildings are a well-established and neutral part of the Barbican's setting particularly along Chiswell Street, Silk Street and Whitecross Street. The scale and proximity of the buildings strengthen the isolation. Glimpses are achieved from the Podium eastward down Chiswell Lane, with the commercial buildings such as Milton Gate and buildings to the north within the London Borough of Islington seen as part of a layered piece of townscape with the former Whitbread Brewery complex sitting in the foreground.

*Impact:*

263. The proposals would have intervisibility with the landscape of the Barbican Estate both from within its setting and from views within the Estate. The varied and expressive townscape is an established neutral characteristic along the north eastern boundary of the Estate. Whilst the development would result in change within the setting to the east particularly in views on the eastern end of the Podium, as demonstrated within HTVIA View 7, it would not detract from the qualities that underpin the significance of the Registered Historic Park and Garden and therefore would have a neutral impact.

Chiswell Street Conservation Area (London Borough of Islington):

*Significance:*

264. The Chiswell Street Conservation Area within the London Borough of Islington straddles the boundary with the Brewery Conservation Area in the City of London. In townscape terms, the boundary between the two municipalities is not clearly defined in this location, and it is considered that both Conservation Areas have a very close relationship and a shared historical significance shared around the former Whitbread Brewery complex. The significance of the Conservation Area is shared with that of the Brewery CA, set out in the relevant section above.

*Contribution of Setting:*

265. The setting of the Chiswell Street Conservation Area makes varied contributions to its significance. To the south, the adjoining Brewery Conservation Area within the City of London provides a significant contribution to the significance of the Chiswell Street Conservation Area as it contains the remaining buildings that make up the former Whitbread Brewery complex that sit on the southern side of Chiswell Street. The South Yard entrance sits directly opposite the entrance to the North

Yard and provides a complete composition and distinct ensemble. Of a similar scale and character, together they form a highly distinctive enclave.

266. Beyond the confined nature of the former buildings of the Brewery complex, the setting makes a limited contribution to the significance of the Conservation Area. The townscape surrounding the CA is formed of a vibrant, eclectic mix of development that shows the development of this part of the City in distinct, clear and legible phases. The layering of large commercial buildings, the Barbican Estate gives a somewhat episodic nature to Chiswell Street as you move along it. The wider area is mixed in appearance with high density large scale development in contrast to the tight grain of mainly listed buildings found within the CA.

*Impact:*

267. As with the Brewery Conservation Area discussed earlier in the report, Historic England and the Georgian Group have all identified harm arising from the proposals upon the Chiswell Street Conservation Area. The comments can be read in full within the Statutory Consultation section at the start of the report, but to summarise concerns relate to the impact from the development in terms of its scale, form, bulk, massing, materiality and architectural character. Following the amendments detailed in the previous sections, all consultees reaffirmed their objections.
268. As before, Officers reach different professional conclusions on the impact on the Conservation Area from the proposals. The Conservation Area sits in a dynamic area of London surrounded by larger commercial modern office developments and the Barbican Estate. As a result, there is surrounding development which contrasts with the traditional, low rise and modest scale development of the Conservation Area thus enhancing the significance and appreciation of it as a unique enclave.
269. The proposed roof extension would be visible in vantage points within the Conservation Area – namely from the North Yard and Lamb Passage. This would introduce a new layer of townscape beyond the historic townscape below within the setting of this Conservation Area and in front of larger developments on Silk Street to the south. The proposed development would not detract from the distinctive enclave of traditional townscape which would comfortably co-exist with the proposals.
270. Giving consideration to the above, Officers consider that the proposed development would not result in harm to the setting of the Conservation Area.

## Barbican and Golden Lane Estates Conservation Area:

### *Significance:*

- 271. The conservation area boundary is tightly drawn around that of the two Estates and the grassy spur of land to the south containing the ruins of the Roman and medieval City wall.
- 272. Overarchingly, the significance of the conservation area can be summarised as the striking juxtaposition between two seminal post-war housing Estates which illustrate evolving trends in architecture, spatial and urban planning, and Modernism in general. The conservation area is defined by its pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience strikingly at odds with the more traditional townscapes and buildings outside the boundary; also for the integration of the ancient remains of the Roman and Medieval City wall, including Bastions 12, 13 and 14 and the medieval church of St Giles Cripplegate in a strikingly modern context.

### *Setting and Contribution to Setting:*

- 273. The wider setting of this large Conservation Area is informed by dense urban development, of a largely post-war, post-modernist and modern architectural character. The northern boundary abuts the London Borough of Islington, and this setting is typically lower rise with a mixture of modern and historic built fabric set out on a historic streetscape. To the east, there is again a mixed townscape around Moorgate, although largely comprised of large scale modern commercial buildings in the immediate vicinity of the Conservation Area – namely the redeveloped series of office blocks that were built along the road London Wall in the 1970s. To the south, the setting is principally formed by the main route of London Wall, Museum and Ironmongers, and further large-scale modern commercial buildings. As with the RPG the southern boundary is considered to be unsatisfactory in terms of quality and its fragmented unfinished form which makes no contribution to setting. To the south and west, late 20th century, mid-rise commercial buildings line Aldersgate Street, largely obscuring the more historic areas of Smithfield Market and Charterhouse Square which are adjacent these have a neutral presence.
- 274. The subject site is not considered to be elements of setting that contribute to the special interest of the Barbican and Golden Lane Conservation Area, given the Conservation Area is appreciated as a standalone but neighbouring architectural masterplans that has little reliance on the wider surroundings to aid appreciation or an understanding of their overall historic, architectural and artistic values.



*Impacts:*

275. The impact of the proposed development would be limited to experiences within and across the eastern boundary of the Conservation Area, particularly on the Barbican Podium with views looking eastward down Chiswell Street reference HTVIA 2, 2A and 7. The SPD notes that views out of the two estates, with glimpses of the surrounding City, are likely to change because the Conservation Area sits within the dynamic context of a densely developed urban centre. Large commercial buildings are an established characteristic found along the eastern side of the Conservation Area, beyond the low rise traditional townscape of the Brewery, and as such the proposal is considered to have a neutral impact and therefore would preserve the setting, significance, character and appearance of the conservation area given it would form part of an additional layering to this diverse townscape.

Other Designated Heritage Assets:

276. The definition of setting is the extent to which an asset is 'experienced,' which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is potentially within the setting of a number of heritage assets. As part of a scoping exercise, officers assessed the likelihood of the proposals' impact on the heritage assets in the locality and scoped in for detailed assessment the ones set out in preceding sections of this report; those assets where the proposals had no potential for impact were scoped out. This assessment is in accordance with paragraph 200 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact of the proposal on its significance. The assets scoped out included:
- Thirteen Bollards in the Yard, Whitbread Brewery (Grade II)
  - Ceramic Mural of nine panels on Cromwell Highwalk (Grade II)
  - Cripplegate Institute (Grade II)
  - 20 Bunhill Row (Grade II)
  - 21 – 29 Bunhill Row (Grade II)
  - Church of St Giles Cripplegate (Grade I)
277. 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.

278. The assets assessed in detail in preceding sections are considered sufficient to understanding the impact on significance overall.

### **Townscape & Views:**

279. 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. These policies seek to implement the Mayor's London View Management Framework (LVMF) SPG (the SPG), protect and enhance views of historic City Landmarks and Skyline Features and secure an appropriate setting and backdrop to the Tower of London.
280. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. This has been supplemented by additional imagery during the planning application's assessment following design amendments.

### London View Management Framework (LVMF) Impacts

281. The LVMF designates pan-London strategic views deemed to contribute to the Capital's character and identity at a strategic level. Those relevant strategic views where there would be a material impact are addressed here against London Plan Policy HC4 and associated guidance in the SPG.
282. The application site is not located within an LVMF Panoramic or Linear viewing corridor and the proposal is not of such a scale that it would be perceptible in relation to these or any of the River Prospects or Townscape Views.
283. As such, there would be no potential impact on LVMF Views.

### City of London Strategic Views

284. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new development. The proposed development site is located within the northern periphery of the City of London, and as such falls outside of the St Pauls Heights policy area, and is located at a significant distance from the Monument views and Tower of London World Heritage Site Local setting study area.

### City Landmarks and Skyline Features

285. The proposal would not affect views of the majority of City landmarks and skyline features in accordance with CS13 (2), only one would be impacted by the proposal as set out below:

#### *Barbican Towers:*

286. This landmark would have a visual relationship with the proposed development in views along Chiswell Street looking west from the east of the site, and from within the South Yard. The proposal would sit as part of a layer of townscape with a variety of architectural forms and styles in front of the Barbican Towers and Officers consider that the proposal would not encroach upon the landmark which would remain prominent and clear in views beyond the site HTVIA 2 and 2A.
287. As such, the experience of the Barbican Towers as a skyline feature would be unchallenged by the proposals and preserved in accordance with the guidance within the SPD. Further assessment of the indirect impacts of the proposal on the listed building are discussed in the heritage section of this report.

### London Borough of Islington

288. Adopted Islington Development Management Policies DH2 identifies local protected views of St. Paul's Cathedral and St. Pancras Chambers and Station. These comprise Views LV1 – LV8. An assessment has been undertaken of these views, and the proposed development site is not located within the viewing corridors and these views would therefore be preserved.
289. The London Borough of Islington were consulted on the proposals, and no comments were made in relation to the views or setting of designated heritage assets.

### Other Views

290. Given the external elements of the works primarily relate to a roof extension and changes to the Chiswell Street shopfronts, the proposals would not be visible in other strategic views. Rather, it would be glimpsed along streets in the locality. The proposed development has been appropriately designed in relation to its surroundings and its quality design and appropriate massing would not detract from the visual amenity of other townscape views. The proposed development would have an appropriate presence in significant views of important buildings, townscape and skylines and would not result in harm to the views identified in the Built Heritage and Townscape Visual Impact Assessment and the settings and

significance of the heritage assets and landmark buildings featured within these views would not be harmed by the proposals.

## **Design & Heritage Conclusion**

291. Overall, with regard to both direct and indirect heritage impacts, no harm has been identified to designated heritage assets. The scheme is equally heritage and design-led with an architectural approach for the proposed roof extension directly informed by the historic evidence and industrial use of the site as Brewery.
292. The extension would clearly be disassociated from the domestic character of the Chiswell Street frontages but utilises a materiality that reflects the traditional historic materials found within the Brewery site leading to an interesting piece of juxtaposed but contextual architecture. The proposal reading behind the Chiswell Street frontage with an expressive industrial character reflects the previous operations of what was once the world's largest Brewery that existed behind the modest, domestic frontage below.
293. Officers consider that the proposed extension can successfully co-exist with the existing robust historic townscape of the Brewery Conservation Area, which would continue to be appreciated as a distinctive enclave in a dynamic area of London. The proposals would also result in several improvements to the existing historic buildings including enhanced frontages onto Chiswell Street with new inclusive step free entrances, making good of damaged historic fabric and an enhanced guest and visitor offering.
294. The proposals represent another chapter in the history of the Brewery site, unique in the Square Mile which has a narrative of evolution, industrial innovation and reinvention. The proposals have been thoughtfully conceived and represent high quality, creative, sustainable and inclusive design which is at the heart of the NPPF and local policies. The extension and heritage enhancements would add another layer to the established local character and would serve to sustain the existing hotel use and support economic vitality which is central to Destination City objectives.
295. In summary, the proposed development would comply with Policies CS10, DM10.1, DM10.2, DM10.5, CS12, CS13, DM12.1, DM12.2 and DM12.3 of the Adopted Local Plan 2015; emerging Policies S8, DE1, DE2, DE5, DE8, S11, S13 HE1 of the City Plan 2040; and London Plan 2021 Policies D3, D4, D5 and HC1. This is in addition to the relevant sections of the National Planning Policy Framework, the National Design Code and relevant supplementary planning guidance including The Brewery Conservation Area Character Summary and City of London Protected Views SPD.

### **Access and Inclusivity**

296. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the emerging City Plan 2040 and policy D5 of the London Plan. In particular, policy DM10.8 requires proposals to achieve an environment that meets the highest standards of accessibility and inclusive design in all development (both new and refurbished), open spaces and streets.
297. Local Plan policy DM 10.8 requires “to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)”. A service provider also has an anticipatory duty under the Act.
298. The proposed development has been carefully designed within the constraints of the existing buildings to ensure that the access needs of all users have been considered.

### **Arrival and departure**

299. London Plan 2021 Policy T6.5 states that all developments should be car-free except for at least one on or off-street disabled persons parking bay. Whilst there are two on-street disabled persons parking bays within proximity of the site there is no disabled persons parking bay provided as part of this application.
300. The site is 500m from the Barbican station which is not step-free. It is 600m from Moorgate station which is step-free. There is a bus stop in proximity of the site served by bus no.153.
301. There is a setting down point directly outside the site on Chiswell Street.
302. Inclusive Mobility and relevant building regulations identify 50m as the maximum for a person to walk without rest. Resting points at 50m intervals would be broadly consistent with the Inclusive Access Management Plan which will be reserved by condition.

### **Entrances**

303. London Plan D5 3.5.9 says that ‘Entrances into buildings should be easily identifiable and should allow everyone to use them independently without additional effort, separation or special treatment’.

304. It is regrettable that step-free access is not provided from the entrances flanking the courtyard entrance, due to the limits imposed by the red line boundaries and unacceptable harm to the listed fabric of the building. The step-free entrance from Chiswell Street has the potential to mitigate some of this separation by demarcating it within the streetscape subject to clear wayfinding and signage that does not cause harm to the significance of the building. It has the potential to create a more equitable access to public areas of the building. The details of signage and wayfinding are reserved by condition.
305. Reception facilities should be consistent with good guidance and relevant Building Regulations. The details of any desks, floor finish, contrast, assistive technology and seating is reserved by condition as part of the Inclusive Access Management Plan.
306. The corner door to the main restaurant entrance from Chiswell Street/Milton Street would remain as inward opening. This entrance will be accessible with clear door widths as set out within the relevant Building Regulations and would be reserved by condition.

#### **Vertical access**

307. Lift access is not provided to all levels due to the likely harm to significant historic fabric. Mitigations will be included, such as securing handrail provision and enhancing visual contrast on stairs. All card operation points would be positioned 750-1200mm above floor level, as according to the relevant Building Regulations and will be reserved by condition.

#### **Horizontal Movement**

308. The ground floor plan includes significant level changes across the site and options for achieving level change were discussed at pre-application stage. Cross-floor movement at the ground floor is achieved by gentle slopes at 1:21 and an internal platform retractable stair lift. The retractable stair lift is shown on the updated proposed ground floor drawing and is a core element in making access improvements.
309. There are narrow corridors of less than 1800mm which limit opportunities for passing, particularly on upper floors. It is the more important, therefore, that there are clear sightlines along corridors and any doors are automated or power-assisted. Details of door opening mechanisms on corridors are to be reserved by condition.

#### **Sanitary facilities**

310. Sanitary facilities need to meet the requirements of Approved Documents M and T, with wheelchair accessible and ambulant accessible facilities. Options for right and left hand transfer are indicated. Details of the layout of wheelchair accessible toilets are reserved in the condition requiring submission of an Inclusive Access Management Plan to ensure that they meet best practice.

### **Room facilities**

311. London Plan 2021 Policy E10 H states that either 10% of new bedrooms should be wheelchair-accessible in accordance with BS8300-2:2018 Figure 52 and Figure 30 or 33, or 15% of the new bedrooms should be accessible in accordance with BS300-2:2018 19.2.1.2;
- 5% wheelchair-accessible en-suite shower room for independent use
  - 1% with a tracked hoist system and a connecting door to an adjoining (standard) bedroom
  - 5% with en-suite shower room to meet the requirements of people with ambulant mobility impairments
  - Further number of bedrooms to make up a total provision of 15% of all bedrooms which should be large enough for easy adaptation to accessible bedroom standards
312. The environment at present does not provide sufficient accessible rooms. The proposal includes 8 additional bedrooms, of which 3 will be accessible located within the proposed roof extension. This equates to 15% (rounded) of new build hotel rooms within the development being accessible aligning with the London Plan Policy E10 H. Of the total 221 rooms, 11 rooms are proposed to be accessible which equates to over 5% of the overall hotel rooms being accessible. The Applicant has sought to maximise the number of accessible rooms within the constraints of the listed buildings that comprise the hotel and on balance this is considered acceptable in the circumstances.

### **Places for rest and recovery**

313. It is recommended that room for restoration and recovery is identified for guests who may experience sensory overload through the next stage of the design process. Relevant guidance is given in PAS 6463: Design for the Mind. It is recommended that the Inclusive Access Management Plan condition includes how this has been addressed and demonstrated.
314. London Plan D5 says as a minimum at least one lift per core (or more subject to assessment) should be a suitably sized fire evacuation lift to evacuate people who require level access from the building. It further notes that evacuation in case of emergency should be dignified, as independent as possible and that manual handling systems for carry down or up are not considered appropriate for reasons



of dignity and independence. Details of how guests who require assistance to evacuate the building in case of emergency are reserved by condition.

315. There will be both an evacuation lift and a carry down system. The submitted Fire Strategy sets out that there is one evacuation lift as well as 'assistive evacuation equipment' to protected stairwells. It concludes that this will provide sufficient vertical escape provisions. It notes that all accessible bedrooms are in the vicinity of the evacuation lift. This would limit reliance on carry-down systems for people who cannot evacuate independently.

### **Access Conclusion**

316. Overall, on balance, accessibility improvements across the site ensure compliance with policy D5 of the London Plan, Local Plan Policy DM10.8 and draft City Plan 2040 policy HL1 – when considered against the constraints of the site, reducing barriers to access for a range of people wherever possible while giving great weight to the significance of heritage assets.

## **Highways and Transportation**

### **Surrounding Highway Network and Site Accessibility**

317. The site benefits from being located within the Barbican area within Central London. The location of the site results in several amenities, services and attractions in close proximity. The figure below outlines the local context of the site.

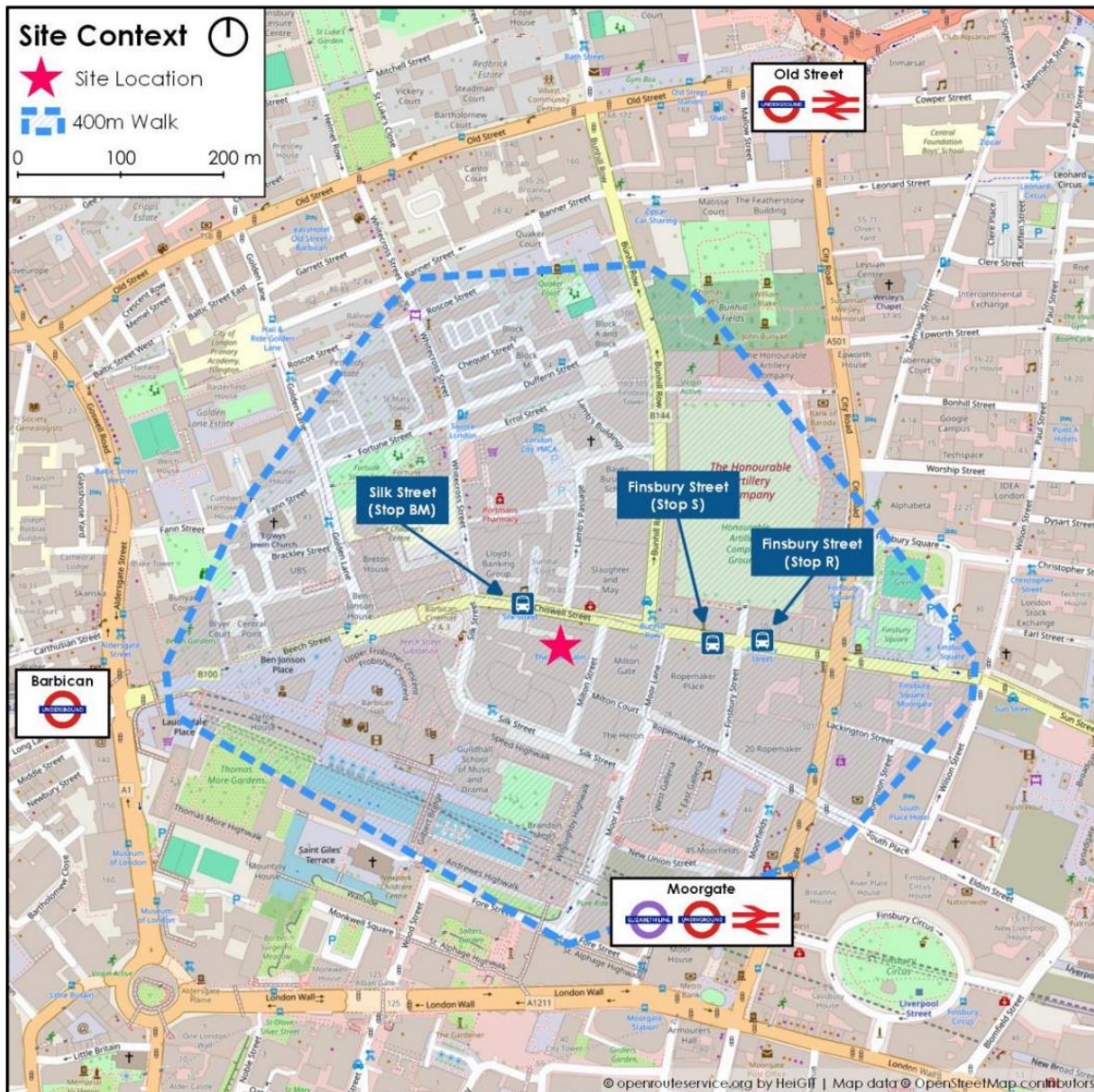


Figure 1 Site Context

318. As shown, there are several transport nodes within the vicinity of the site with convenient access for guests and staff.
319. The site takes its main entrance for guests via Chiswell Street, as shown in the photographs below.



**Figure 2** Guest Access via Chiswell Street

320. Chiswell Street features footways along both sides of the road, with dropped and signalised crossing points within the vicinity of the site for onward travel.
321. The site is located circa 500m from Barbican Underground Station which is served by the Circle, Hammersmith & City, and Metropolitan lines. This allows for convenient travel to key destinations such as Heathrow Airport, the West End, and King's Cross St Pancras International Station for Eurostar services.
322. Moorgate station is circa 600m from the site which is served by the Northern line of the London Underground, providing direct access to key destinations such as London Bridge, Bank, and Camden Town. National Rail services also serve the station, offering connections to various destinations across London and beyond. This includes direct services to destinations such as Cambridge, Hertford, and Stevenage.
323. These stations provide various transport options, including access to the London Underground, National Rail services, and bus routes, enhancing connectivity for guests around London.
324. As shown in Figure 1, the closest bus stop to the site is the Silk Street (Stop BM) which is adjacent to the frontage of the site along Chiswell Street. The stop is served by the 153 service which provides a route between Finsbury Park Interchange and Liverpool Street Station. The service operates between 05:09 and 00:15, with a peak frequency of every 10-12 minutes.



325. Furthermore, the hotel concierge service offers guests assistance with arranging taxi services or private transportation with solutions to meet individual travel requirements and preferences.
326. The Site therefore 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.
327. The goods and service entrances for the respective Montcalm Hotel and The Brewery activities are located along the eastern side of the site via Milton Street. As shown in the photographs below, the road forms part of a controlled zone between several intervals of the day. On-street bays are provided which are managed via an unattended Pay-by-Phone system for standard use, with several disabled bays also provided.

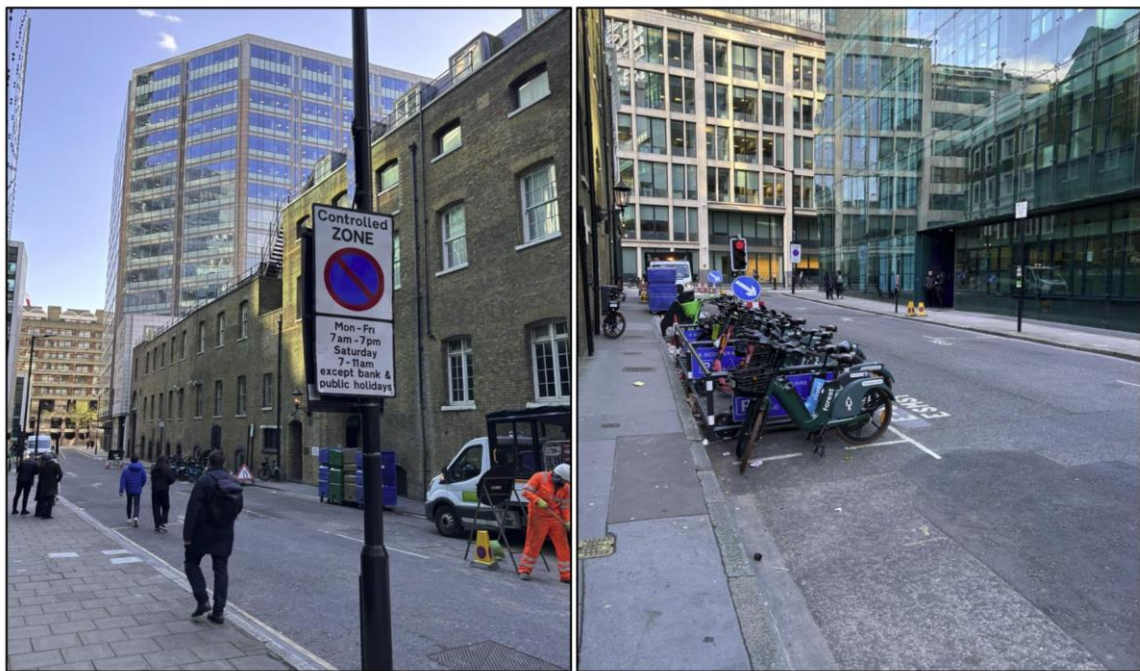


Figure 3 Milton Street

### Trip Generation

328. A trip generation assessment was undertaken to determine peak hour and daily person trips generated by the scheme, comparing forecast trips associated with the proposed development to the existing.

## Existing

329. The hotel currently comprises 213 bedrooms. The table below summarises the forecasted trip generation associated with the site in its current form. Consideration has been given to the respective traditional AM (08:00-09:00) and PM (17:00-18:00) peak hours on the local highway network, alongside a daily total. This forecast is robust as it assumes that all rooms are occupied.

Mode	AM Peak			PM Peak			Daily		
	Arr	Dep	Tot	Arr	Dep	Tot	Arr	Dep	Tot
Taxi	2	2	4	4	4	8	53	53	106
Other Vehicles	0	2	2	1	1	2	16	20	36
P Transport	8	24	32	21	23	44	314	300	614
Pedestrian	6	23	29	23	30	53	197	334	531
Cyclist	0	0	0	1	1	2	5	6	11
<b>Total</b>	<b>16</b>	<b>51</b>	<b>67</b>	<b>50</b>	<b>59</b>	<b>109</b>	<b>585</b>	<b>713</b>	<b>1,298</b>

Existing Trip Attraction Forecast (213 Bedrooms)

330. As shown, the existing 213 bedrooms could attract in the order of 1,296 two-way trips via all modes across the course of a typical day. These would predominantly be by public transport and on-foot. The forecast highlights that the majority of any vehicle trips would be by taxi.

## Proposed

331. Proposed plans for the additional 8 bedrooms are forecast to generate an additional 49 two-way trips by all modes across the course of a day. It is considered that the net increase in rooms would give rise to an insignificant trip generation impact on the basis of the above assessment. As per the existing trip forecast, public transport and trips on-foot would constitute the majority of trips.

Mode	AM Peak			PM Peak			Daily		
	Arr	Dep	Tot	Arr	Dep	Tot	Arr	Dep	Tot
Vehicle	0	0	0	0	0	0	3	3	6
Taxi	0	0	0	0	0	0	2	2	4
P Transport	0	1	1	1	1	2	12	11	23
Pedestrian	0	1	1	1	1	2	7	13	20
Cyclist	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>4</b>	<b>22</b>	<b>27</b>	<b>49</b>

Net Additional Trip Attraction Forecast (+8 Bedrooms)

332. The plans were updated on 24.11.2025 and again clarified on 10.04.2025 resulting in reduction of net proposed hotel rooms (from 23 to 8), therefore it is considered that the results of the above assessment continue to remain negligible.

### Servicing and Deliveries

333. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.
334. The servicing area for the proposed development is accessed in the same way as the existing arrangement, via Milton Street, with no deliveries received at the main hotel entrance. Delivery and servicing activity to the hotel is separate from that associated with The Brewery, which benefits from a separate delivery / servicing access.
335. Delivery and servicing activities largely comprise food and drink deliveries, refuse and recycling collections, and those for other items such as linen. It is not envisaged that the proposed increase in bedrooms would cause an increase in trips of this nature to / from the site. It is not considered that the size of vehicle would differ to that currently used.

### Refuse Management and Waste Strategy

336. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.

337. The site's secure refuse store would be retained following the proposed extension and contains sufficient capacity to accommodate any modest increase in waste generated by the additional guest bedrooms. There are separate waste streams for general residual waste, mixed dry recycling, glass and organic waste, all of which would continue to be managed accordingly.
338. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facility complies with their requirements.
339. Overall, the proposed refuse collection strategy is considered acceptable and in accordance with policies DM17.1, DM16.1 and DM16.5 of the Local Plan, as well as emerging City Plan 2040 policies S10 and VT2. Full details are to be secured within the Delivery and Servicing Plan secured by condition.

### **Car parking**

340. London Plan policy T6 (Car parking) states car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity, and Local Plan 2015 policy DM16.5 and the draft City Plan 2040 policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.
341. Local Plan 2015 policy DM16.5 (2) states that designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements.
342. London Plan policy T6.4 (Hotel and Leisure Uses Parking) of the London Plan confirms that in locations of PTAL 4-6: "any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing."
343. The hotel currently does not benefit from any car parking which is acceptable given its PTAL 6b rating, and this is proposed to remain the case as part of this application.
344. London Plan Policy T6.6 (Non-Residential Disabled Persons Parking) of the London Plan confirms: "all non-residential elements should provide access to at least one on or off-street disabled persons parking bay."
345. Currently, no disabled parking spaces are provided within the site curtilage, however two on-street disabled bays are provided along Milton Street adjacent to the site on the respective sides of the road, as shown below.





Figure 7 Milton Street Disabled Bays

346. The bay is restricted to blue badge holders only and is subject to a maximum stay of four hours during weekdays, with no limit on Saturdays and Sundays. This is an existing situation at the hotel which is managed accordingly, with appropriate pick-up and drop-off arrangements for disabled guests. Currently there are no loading/unloading restriction along Chiswell Street and vehicles can make use of kerb availability, provided it is safe to do so. Therefore, the nominal increase in rooms would therefore not result in a significant impact in these terms.
347. It is therefore considered that the existing provisions for car parking within the vicinity of the site and current parking restrictions (no loading/unloading), would be sufficient to accommodate any additional demand as part of proposed plans in this application.

### Cycle Parking

348. London Plan Policy T5 (Cycling) 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 within 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.

349. According to the London Plan Policy Standards (2021) the cycle parking requirements of the scheme require C1 (Hotel) developments be afforded one long-stay space per 20 bedrooms and one short-stay space per 50 rooms.
350. Due to the proposed increase in the number of hotel bedrooms being reduced from 23 to 8, it is considered that this is a modest change in room numbers, which will have a negligible impact on the cycling parking numbers.
351. Cycle parking is provided on-street adjacent to the site frontage on Milton Street, as shown in the photograph below.



**Figure 8** Milton Street Cycle Parking

352. Further provisions are also available along Milton Street adjacent to the site, with a cycle hire and e-scooter facility provided, as shown in the photographs below.





**Figure 9** Milton Street Cycle Hire & E-Scooter Facility

353. No additional cycle parking provisions are proposed as part of the scheme with the existing on-street provisions sufficient to accommodate any additional cycle parking demands from the new bedrooms.
354. It should be noted that the courtyard is not in the Applicant's ownership and the historic buildings cannot be altered to provide cycle parking, and therefore, there is not a suitable location on-site to provide any additional cycle parking.
355. Overall, the site is well-located for travel via public transport, including primary trips to / from the hotel and those during a guests' stay. The proposal will have minimal impact on the site access and the local highway network, as the majority of all movements are by active and sustainable travel. Although there may be trips by vehicle for guest arrivals and departures, these are likely to be pick-up and drop-off trips by Taxi. The general means of access at the site would remain consistent with the existing layout of the site, with delivery and servicing activities accommodated via Milton Street. It is not expected that there would be a material difference in delivery and servicing frequencies, but rather duration owing to the additional number of bedrooms.

### **Construction Logistics**

356. The London Plan, Policy T7 on deliveries, servicing and construction, the Local Plan 2015 and the emerging City Plan 2040, indicates that the development must address the impacts during the construction phase, and when the site becomes operational.

357. A Construction Management Plan (CMP) has been submitted in support of the planning application, and this provides useful information to outline the proposed works and methodology
358. The CMP has taken into consideration the 'Transport for London (TfL) Construction Logistics Plan Guidance – for Developers' and 'London Best Practice Guidance – The control of dust and emission from construction and demolition'. This provides useful information to describe the proposed works and how they would be undertaken. It also provides useful information to describe how the impacts associated with the construction period would be mitigated.
359. The City of London needs to ensure that the development can be implemented without being significantly detrimental to the amenity or the safe and efficient operation of the highway network in the local area. Therefore, a Construction Logistics Plan (CLP) and a Demolition Logistics Plan DLP is proposed to be secured as via condition to ensure the construction and demolition of the site is in accordance with The London Plan Policy T7 and DM16.1 of the CoL Local Plan. This would provide a mechanism to manage/mitigate the impacts which the proposed development would have on the local area. The CLP would need to be approved by the CoL prior to works commencing on site.

### **Highways and Transportation Conclusion**

360. Subject to the recommended conditions the proposal would accord with relevant transport related policies including London Plan policies T5 Cycle Parking, T6.5 non-residential disabled persons parking, T7 Deliveries, Servicing and Construction. It accords with the Local Plan 2015 Policy DM16.1, DM16.3, DM16.4, and DM16.5. It also accords with the emerging City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. As such, the proposals are considered acceptable in transport terms.

### **Environmental Impacts**

#### **Air Quality – HG - Completed**

361. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions 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 should terminate above the roof height of the tallest part of the

development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.

362. A Construction Management Plan and Sustainable Design Statement have been submitted with the application providing information about air quality impacts during construction and during operation.
363. The submitted assessment advises that mitigation measures for on-site activities and traffic associated construction phases, including demolition works, will be implemented. It is suggested that during construction, the Contractor will be required to implement best practice guidelines for air, dust, and noise pollution on site. The proposed development would be car-free and the proposed energy strategy is all-electric, with heating provided through air source heat pumps which is welcomed. It is stated that the existing gas fired boilers are to be replaced by air-source heat pumps, and the existing generator is to be removed as it is no longer required within the development. All of the combustion plant is being removed from the development therefore there should be no combustion flues associated with the development. This is welcomed. It is stated in the Transport Statement that there will not be an increase in the number of service and delivery trips associated with the hotel due to the increase in bedrooms. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment. On that basis, it is considered that the proposed development would be unlikely to result in significantly adverse impacts on local air quality.
364. The City's Air Quality Officer has raised no objection subject to conditions in respect of Non-Road Mobile Machinery Register.
365. In light of the above and subject to conditions, the proposed development would accord with Local plan policy CS15, policies HL2 and DE1 of the draft City Plan 2036 and SI 1 of the London Plan which all seek to improve air quality.

#### **Overall impact on residential amenity**

366. Local Plan policy DM21.3 and draft City Plan 2040 policy HS3 seeks to protect the amenity of existing residents by resisting uses that would have an undue impact on amenity through noise disturbance, fumes and smells and vehicular and pedestrian movements likely to cause disturbance. Proposals should be designed to avoid overlooking and protect privacy, daylight and sunlighting levels to adjacent residential accommodation. This section of the report draws together an assessment of the impacts of the scheme on residential amenity.

#### **Noise and Vibration**

367. Local Plan 2015 policy DM15.7, and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. 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. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels. Emerging City Plan 2040 Policy HL3 ('Noise and Vibration') reiterates the requirements of Policy DM15.7.
368. An Acoustic Assessment dated 06.08.2024 has been submitted which provides an outline assessment of the impact of noise and vibration on the surrounding area considering nearby noise sensitive receptors, including residential properties.
369. The surrounding area is predominantly commercial in nature with high rise office buildings surrounding the site to the North, East and South. Residential dwellings are located to the East; Ben Jonson House and Cromwell Tower, both forming part of the Barbican Estate.
370. To determine the existing noise climate around the site measurements were undertaken at the following locations to determine the lowest background noise level and averaged noise level:
- Measurement Position 1 - Chiswell Street/ Milton Street - Noise levels at this location were predominantly affected by existing building services noise from the surrounding buildings and traffic from Chiswell Street.
  - Measurement Position 2 - Silk Street - This measurement position was selected as being the most representative of noise levels within the vicinity of Cromwell Tower and Ben Johnson House
  - Measurement Position 3 - Rear of site - Noise levels at this location were dominated by existing building services noise from ventilation plant associated with the 1 Silk Street commercial building.
371. City of London's Environmental Health team requirements for new building services plant is that "The level of noise emitted by any new plant shall be lower than the existing background noise level by at least 10 dBa. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The measurements and assessments shall be made in accordance with BS4142. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which any plant is or may be in operation.
372. In line with Policy DM 15.7, the proposed mechanical services would be designed so that noise emissions from the plant do not exceed the following levels when assessed at the nearest noise sensitive location. The proposed rooftop plant consists of a number of ventilation fans and heat pumps serving the building

services of the hotel as well as an emergency generator. The following mitigations are proposed to ensure the limitations are not breached:

- Enclosures
- In-duct Attenuators
- Proprietary/Bolt-on Attenuators

373. The nearest noise sensitive receptors to the proposed plant are:
- One Silk Street (Commercial Offices) - Located at a distance of 7m to the south, overlooking the rear of site.
  - Cromwell Tower (Residential) - Located at a distance of 25m to the south-west of site, overlooking some rooftop areas on the western end of site.
  - Whitecross Street (Residential) - Located at a distance of 36m to the north-west of site on the corner of Chiswell Street and Whitecross Street.
  - Montcalm Townhouse (Commercial Hotel) - Located at a distance of 15m to the north of site on the opposite side of Chiswell Street.
  - 37 – 40 Chiswell Street (Commercial Offices) - Located at a distance of 15m to the north of site on the opposite side of Chiswell Street.
  - 60 Chiswell Street (Commercial Offices) - Located at a distance of 13m to the east of site, on the opposite side of Milton Street.
374. The results of the assessment indicate that, with the inclusion of the proposed acoustic mitigation measures detailed above, atmospheric noise emissions from the proposed plant are within the criteria required by the City of London.
375. Generally, in City redevelopment schemes, most noise and vibration issues occur during demolition and early construction phases. Impacts on neighbours from construction will be mitigated by ensuring that the Contractor complies with best practice under the Considerate Constructors Scheme (CCS). Details of noise and vibration mitigation, including control over working hours, types of equipment used, would be included in Schemes of protective works for Demolition and Construction Logistics Plan would be secured by condition.
376. Residents have raised concerns that the proposed development would give rise to increased noise nuisance. The uplift of 8 bedrooms is considered minor and is not expected to give rise to additional noise. A hotel management plan was submitted as part of this application which demonstrates the management of the public leaving and arriving at the hotel, therefore reducing impacts to neighbours amenity. It should be noted that no terrace is proposed as part of the proposed alterations and extension to the hotel. It is considered reasonable that conditions are imposed to ensure that the noise impacts from new plant are adequately controlled and minimised.



377. The proposed development will be car free. As a result, all vehicle trips generated by the development will be associated with delivery and servicing with a small increase in taxi numbers. It is not expected that there would be a material difference in delivery and servicing frequencies,. The general means of access at the site would remain consistent with the existing layout of the site, with delivery and servicing activities accommodated via Milton Street. Restricted hours for deliveries and servicing will be secured by condition.
378. Subject to the proposed conditions, the proposals would comply with London Plan Policy D13 and D14, Local Plan Policy DM15.7 and draft City Plan 2036 Policy HL3.

#### Sunlight and daylight

379. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.
380. Local Plan Policy DM10.7 'Daylight and Sunlight' seeks 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 (BRE) guidelines.
381. Draft City Plan Policy DE8 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces, is appropriate for its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines.
382. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan 2040 states when considering on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
383. The BRE guidelines "Site layout planning for daylight and sunlight - A guide to good practice" (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:
- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which

measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.

- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but provide that care should be taken to not block too much sun from these rooms.

384. The following surrounding properties contain residential accommodation and, due to their proximity to the development site, have been assessed in terms of the effects of the proposed development upon their daylight and sunlight amenity:

- **Cromwell Tower**
- **Ben Jonson House**
- **Sundial Court, 38-42 Chiswell Street**
- **Sundial Court, 39-40 Chiswell Street**
- **Sundial Court, 41-42 Chiswell Street**

#### Impact of the proposed scheme on Sunlight/ daylight

385. Cromwell Tower is located to the west of the site. The results show the impact to this property in relation to both daylight and sunlight will be negligible and fully in accordance with the BRE guidelines.

386. Ben Jonson House is located to the west of the site. The results show that there will be no impact to this property in relation to either daylight or sunlight.

387. Sundial Court, 38-42 Chiswell Street (Courtyard facing rooms) is located to the north of the site and is a student hall of residence. Some of the student rooms face the courtyard and others face Chiswell Street. The results show that the daylight and sunlight impact to the courtyard facing rooms will be negligible and fully compliant with the BRE guidelines.

388. Sundial Court, 39-40 Chiswell Street - In relation to the Chiswell Street facing elevation, the results show that the maximum proportional VSC reduction of 16.1% is small and compliant with the guidelines. Whilst the NSL figures show proportional reductions of up to 37.3%, this level of change is typical in a high density area where alternative VSC targets are appropriate. In such circumstances, the BRE guidelines say that VSC is the correct parameter to use and therefore the overall impact is considered acceptable.

389. Whilst there will be a small reduction in winter sunlight to one room, this is not unusual in an urban location. The annual sunlight results are fully compliant with the BRE guidelines.
390. Sundial Court, 41-42 Chiswell Street - The proportional VSC reductions to the windows on the Chiswell Street façade will be less than 7% and will therefore fully accord with the BRE guidelines. The NSL reductions will generally be minimal. There will be a borderline proportional NSL reduction of 20.5% to one first floor room. The sunlight impact will be minimal and fully compliant with the BRE guidelines.

#### Overshadowing

391. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.
392. With regards to overshadowing, the impact to each garden or amenity area will be negligible. The courtyard within the Brewery, and the triangular region of public space on Silk Street to the north of Cromwell Tower, will not have any meaningful amount of sunlight in the existing situation due to the height of the existing buildings immediately to their south. The proposed development does not alter this situation. Therefore, the overshadowing impacts of the proposal are compliant with the BRE guidelines.

#### Lighting

393. Subject to further details in respect of the design of the building facades, there will be a lighting strategy secured by condition, and subject to this condition it is not considered that the proposal would have any undue impact in respect of light spillage noting that such details would need to comply with the adopted Lighting SPD.
394. Subject to conditions it is considered that the proposal would comply with residential amenity related policies: Local Plan policies DM10.3, DM15.7 and DM21.3, and emerging City Plan 2040 policies HL3, HS3, DE4(b), DE7, and DE8.

#### **Sustainability**

395. 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 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, however as set out in the SPD, the requirements will only be applied to applications submitted after its adoption. Although the requirements of the SPD do not apply to the Proposed Development at 52 Chiswell Street, the application 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. As such, the scheme is considered to be in general compliance with the actions recommended in the SPD.

396. As a minor development the scheme is not required to demonstrate that it meets London Plan policy SI2 requirements (scheme to be net zero-carbon, to include a detailed energy statement using the energy hierarchy framework, to calculate WLC emissions) or to follow CoL's Carbon Options Guidance. However, the submitted Sustainability Design Statement outlines how the design approach adopts similar principles and hierarchy methodology to inform and justify the development proposal.

#### Circular Economy

397. 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. Though not a major application, the proposed development has sought to apply the circular economy principles set out by the London Plan, Local Plan, and emerging City Plan to inform the design process.
398. The existing site comprises a collection of 18th century listed buildings which previously served as the former site of Whitbread & Co brewery, and since 2011 have served as the premises for The Montcalm at The Brewery hotel. The proposals seek to partially demolish the existing building including the existing rooftop extension and plant which would be replaced with a new rooftop extension and upgraded plant, internal and façade alterations, the altering and addition of new entrances, and associated works.

399. In assessing the condition of the existing building, several issues related to its performance have been considered. In particular, the existing MEP system is outdated and performs below the standards of contemporary thermal and carbon efficiency and impacts the building's ability to meet existing hotel market demands. The proposed works offer an opportunity to improve the hotel's accommodation capacity, whilst also consolidating external plant interventions which would contribute to the long-term sustainability of the site.
400. The Sustainable Design Statement for the planning application describes the approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.
401. 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:
- Significant retention of the existing building, minimising the need for new materials: 91% of façade, 100% of substructure, 90-95% of superstructure.
  - The positioning of air handling units close to ventilated spaces to minimise the length of ductwork and associated material quantity
  - The reuse of existing riser provision, cores, and generators
  - The exploration of modular design within the MEP services to improve ease of disassembly and to make services more accessible
  - The exploration of reuse of deconstructed materials including stone on the ground floor, glass within bedrooms and bathrooms, removed facade brickwork, and removed steel framing
  - Confirmation of a commitment towards key GLA targets including the diversion of a minimum of 95% of construction and demolition waste from landfill, a minimum of 20% reused/recycled content specified across the development, and a minimum 65% recycling rate for municipal waste by 2030

#### Operational energy strategy and carbon emissions

402. The Energy Strategy accompanying the planning application demonstrates that the proposed development has been designed to achieve a site-wide overall 70% reduction in regulated carbon emissions compared with the existing building performance in line with Building Regulations Part L 2021. Of this figure, 65% of savings would be achieved through energy demand reduction measures, whilst 5% of savings would be achieved through renewable energy sources.
403. Energy demand and the risk of overheating would be reduced by including the following design measures:
- Use of solar glazing with a low g-value to reduce excessive solar gains and help reduce cooling load, and low U-value glazing and fabric for the new extension

- Projections around windows to allow daylight to enter whilst minimising unwanted direct solar gain
- Use of low energy lighting with control systems to detect occupants
- Use of Central Air Handling Units with high heat recovery efficiency to provide mechanical ventilation
- The inclusion of air source heat pumps (ASHPs) to provide efficient cooling, and the exploration of PVs at the next design stage

404. The inclusion of openable windows was explored but was discounted due to the density of the site's surroundings which is characterised by overshadowing from adjacent buildings, and the building's high internal loads which would collectively limit the benefits provided by openable windows. Wastewater heat recovery has also been explored and will be subject to further investigation once strip out is complete to ascertain installation possibilities.

405. There is currently an available district heating network located in close proximity to the site. However, connection to this network is not required for minor applications and in this case has not been proposed as the site's all-electric approach is considered sufficient to future proof the building and meet its energy needs.

#### Whole life-cycle carbon emissions

406. As a minor development, the proposals are not required to calculate WLC emissions. However, in addition to the operational carbon reduction measures highlighted above, measures to reduce embodied carbon have also been incorporated into the design of the scheme and will be explored further during the detailed design stage. These include:

- Ensuring high levels of retention and reuse of the existing structure therefore minimising the need for new materials and associated carbon impact
- The roof extension will be of a lightweight nature, reducing the need for strengthening and additional materials
- Timber infill panels will be considered to minimise weight and embodied carbon impact
- The use of fabric ductwork instead of steel ductwork will be explored to reduce embodied carbon

A condition is attached to request a RIBA stage 4 Whole life-cycle carbon assessment to confirm that carbon reduction opportunities have been maximised.

407. BREEAM

- A BREEAM 2014 Refurbishment and Fit Out pre-assessment has been undertaken concluding in a targeted BREEAM rating of 'Excellent', with the potential for 'Outstanding'.
- 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 resilience credit in the Waste category.

#### Climate Resilience Urban Greening and Biodiversity Net Gain

408. The scheme proposes to include greening in the form of a green roof on the existing entrance wing and small areas of flat roof subject to structural investigations, and planting along the edges of the plant screens.
409. The proposed development is exempt from the Biodiversity Net Gain requirement as it does not impact a priority habitat and impacts less than 25 metres of onsite habitat and less than 5 metres of on-site linear habitat.
410. A preliminary Ecological Appraisal has been undertaken and recommends the following enhancements to improve the ecology of the site:
- A minimum of two open-fronted nest boxes should be installed within the land ownership of the site post-development.
  - New soft-landscaping proposals should include the creation of green roof habitat, with a focus on providing a diverse range of native wildflowers and grasses to maximise the value of green roofs for invertebrates and insectivorous birds.
  - Green roofs should also include invertebrate boxes (e.g. Wildlife World Solitary Beehive, National Trust apex insect house, pinta apex insect house etc.) and refugia (e.g. log brush piles) to provide additional invertebrate habitat.

The above ecological enhancements have been secured via condition.

#### Overheating

411. 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 reducing the amount of heat entering the occupied spaces through optimising the glazing ratio, fabric, and glazing performance, and the provision of mechanical ventilation.

#### Flooding

412. SuDS were explored for the management of surface water in line with the London Plan's drainage hierarchy. However, options to include SuDS on the roof and along the areas of public realm surrounding the site were discounted due to space and



structural limitations, in addition to the applicant's lack of ownership of surrounding space. Blue roofs were also explored but were considered infeasible due to increased loading requirements, whilst possibilities of implementing rainwater reuse were discounted due to insufficient basement space, and the difficulty in installing the additional pipework that would be required. In view of the identified constraints and the limited nature of the works, it is proposed to reuse the existing drainage infrastructure where feasible.

#### Water Stress

413. The proposed development seeks to achieve a minimum of a 40% improvement against the baseline performance, targeting three BREEAM credits under 'Wat 01 Water consumption' through the specification of the following efficient fittings, sanitaryware and appliances:
- Low-flush WCs will be specified to reduce the volume of water consumed during flushing, including dual-flush cisterns, and low-flow urinals.
  - Water reduction fittings for showers and taps – shower head flow rates will have the greatest impact within this building and will be a primary focus for controlling flow rates.
  - Water efficient appliances specified within kitchens and clusters will have water-saving features as a primary specification requirement.
  - Metering and monitoring of water consumption will be included, allowing easy detection of water leakage

#### Sustainability Conclusion

414. 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.
415. The proposed development would deliver a high quality, all-electric and energy efficient development that goes over and above policy requirements for minor applications and achieves more ambitious targets associated with minimum requirements for major developments. The building 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 emerging City Plan

2040 policy DE1. Additionally, the proposals meet the London Plan policy SI2 target of 35% operational carbon emission savings compared to the existing building performance in accordance with Part L 2021 and demonstrate the implementation of various measures to reduce operational energy demand, with further exploration of opportunities proposed at later design stages.

416. By achieving high levels of retention including 91% of the existing façade, 100% of existing the substructure, and minimum 90% of the superstructure, the proposal would require limited new build elements and would satisfy the GLA's circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and emerging City Plan 2040 policy CE1. The building design responds well to climate change resilience by addressing the risk of overheating through design measures, saving water resources and identifying various opportunities for urban greening and biodiversity 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 emerging City Plan 2040 policies S14, OS1, OS2, OS3, S15, CR1, CR3

### **Suicide Prevention**

417. Policy DM 3.2 of the adopted Local Plan 2015 ('Security measures in new developments and around existing buildings') aims to ensure that appropriate security measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm.
418. Policy DE4 of the emerging City Plan 2040 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling.
419. Regarding the proposals, there are no publicly accessible elevated spaces. The roof is to be accessed by one trained personnel only. There are four access hatches proposed, ten maintenance access doors and details of handrail guarding is set out in the Design and Access Statement and has also been incorporated into the submitted Fire Planning Statement. Measures have been put in place to prevent falls and accidents. All new windows are openable so that they can be cleaned from the inside of the building. Handrail guarding and screens have been provided to areas of flat roof for access and maintenance purposes. Plant equipment located in areas of the roof that is accessible and near the access hatches and maintenance access doors.
420. Overall, a combination of physical barriers, staff training and surveillance are proposed to maximise the effectiveness of preventative measures, including measures that increase the potential for human intervention. Therefore, the proposal would comply with the relevant development plan policies, notably DM3.2.

## **Fire Statement**

421. A Fire Statement has been submitted outlining the fire safety strategy for the buildings which has been developed in consultation with 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.

## **The Public Sector Equality Duty (section 149 of the Equality Act 2010)**

422. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, 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.
423. Section 149(3) of the 2010 Act provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
  - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such person is disproportionately low.
424. 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.
425. It is the view of officers that a decision to grant permission would remove or minimise disadvantages suffered by persons who suffer from a disability including mobility impairment. In particular, the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability, whether you are pregnant, race, sex, sexual orientation and gender reassignment and

marital status subject to details reserved via condition requiring the submission of an Inclusive Management Access Plan. Full details of matters relating to access are set out in the Access and Inclusivity section above. A number of limitations have been identified which have been found to be acceptable on balance having regard to the existing nature of the hotel, site and landownership constraints and the fact that the buildings are listed.

426. It is recognised that noise and disturbance during construction may have a disproportionate impact on certain groups. Demolition stage and construction stage logistics plans would be secured via condition, alongside a distinct scheme for the protection of neighbouring amenity during these phases. Such documents would be reviewed on submission and required to identify noise sensitive receptors in the area, and any mitigation measures required thereof to ensure that there is no undue harm caused to neighbouring amenity during construction. They would also be reviewed for their mitigation as to the impacts of any footway closure or highway closure during construction which could disproportionately impact people with mobility challenges.
427. It is noted that the Equality Act carries ongoing responsibilities which will continue once the development is complete. As part of considering the design of the building and the physical environment, property management teams for each buildings and public spaces will need to have suitable management policies and procedures to ensure the obligations of the Act are met once the buildings are in operation.
428. It is the view of officers that the proposed development would reduce barriers to access for disabled people through the provision of enhanced accessibility at the site and the introduction of step-free access to the building.

### **Human Rights Act 1998**

429. 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")).
430. Insofar at the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm through noise to those living in nearby residential 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, proportionate to the level of interference. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential or religious properties including by reason of loss of light or privacy. As such, the extent of harm is not considered to be unacceptable and does not cause the

proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2040.

431. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising though impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

### **CIL and Planning Obligations**

432. 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.
433. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
434. On the 1<sup>st</sup> 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).
435. CIL contributions and City of London planning obligations are set out below.

#### **MCIL2**

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£32,480.00	£31,180.80	£1,299.20

#### **City CIL and S106 Planning Obligations**

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£17,400.00	£16,530.00	£870.00
<b>City Planning Obligations</b>			
Affordable Housing	£32,900.00	£32,571.00	£329.00
Local, Training, Skills and Job Brokerage	£19,740.00	£19,542.60	£197.40
S106 Monitoring Charge	£1,500.00	£0	£1,500.00
<b>Total liability in accordance with the City of London's policies</b>	<b>£71,540.00</b>	<b>£68,643.60</b>	<b>£2,896.40</b>

#### City's Planning Obligations

436. The obligations set out above and below are required in accordance with the City's Planning Obligations SPD 2021. 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.

- Remedial Highway Works (including Highway Schedule of Condition Survey, site access, consents, licenses and any other matters necessary for the development)
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (submissions to cover Demolition, Construction and End Use stages)
- Construction Monitoring Contribution (£30,935 for the first year of construction and £25,760 for each subsequent year of construction)
- Travel Plan (incorporating Cycling Promotion Plan)
- Retention of Project Architect until practical completion

#### Monitoring and Administrative Costs

437. 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.

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

### **Conclusions**

439. 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 draft Local Plan and considering all other material considerations.
440. The proposed extension and alterations would refurbish and upgrade the Montcalm Hotel to retain its status as a leading heritage hotel within the City of London with an enhanced visitor experience including improved quality of accommodation, amenity offering, enhanced inclusive access and a more sustainable operation. The proposals would result in an uplift of 8 bedrooms, increasing the total number of rooms within the Hotel from 213 to 221 alongside new and improved bar, restaurant, lounge and events space at ground floor for the public and guests to use.
441. The site lies within the North of the City; a Key City Place as defined within Core Strategic Policy CS5 and within a rejuvenation area. Policy CS5 supports implementing proposals for the rejuvenation, intensification and further improvement of this area. The City's rich archaeological heritage has a major role to play in the Destination City programme and a strong contribution to make to the City's cultural offer. Emerging City Plan Policy CV4 requirements for proposals for hotels do not need to be met as the Proposed Development will retain its existing land use as a hotel (Use Class C1). The proposals include an uplift in the overall floorspace of the hotel, and the number guestrooms provided. The renovation and extension of this existing use will help build on the objectives of Destination City to boost foot fall and local economic spend given its proximity to a number of attractions including the Barbican Arts Centre, Guildhall School and the future London Museum within the North of City Key Area of Change.
442. Hotels are supported as a strategic function of the Central Activities Zone (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, dated January 2023, which identifies a demand capacity for an additional 350 rooms per annum in the City of London to 2037. It is therefore considered that the hotel's refurbishment, upgrade and provision of additional hotel bedrooms would contribute to the balance and mix of uses in the area and would offer complimentary facilities to be accessed by the public.



443. This is a design, heritage and research led scheme informed by architectural and historic significance. Great weight has been attached to the significance of the designated heritage assets considering direct and indirect impacts comprising eight listed buildings, a further six Grade II listed buildings are located within the immediate surrounding vicinity of the site, forming the remaining elements of the Whitbread Brewery complex which are not within the site boundary. The site is also located within the Brewery Conservation Area and sits adjacent to the Chiswell Street Conservation Area (within the London Borough of Islington) and the Barbican and Golden Lane Estates Conservation Area.
444. Architecturally, the proposal represents high-quality, thoughtful design, with alternative, more traditional approaches tested in early stages, and which ultimately strikes a compelling balance between creative resolution and preserving the unique heritage constraints of the site.
445. The two-storey roof extension would replace the incoherent dated additions with a bold new architectural statement which would be clearly distinct but also compatible with the heritage assets below and the wider Brewery complex. The design rationale preserves the essence and historic fabric of the Brewery and is directly inspired by the historical roof forms which have been previously present on the site. Importantly, the extensions sit as part of a wider comprehensive upgrade of the Hotel which would safeguard the long-term use of the heritage assets it occupies and enhance the sustainability credentials of the hotel, improve inclusive access and provide renewed animation and activation to Chiswell Street.
446. Objections and comments have been received from statutory consultees including Historic England, the Georgian Group, Society for the Protection of Ancient Buildings and the City of London Conservation Area Advisory Committee and other heritage groups as well as a third party representations relating to the appropriateness of the architecture; the bulk, scale, height and massing of the proposals; the sense of overbearing and the impacts on designated heritage assets; and the impacts on the character and appearance on both the Brewery and Chiswell Street Conservation Areas. This report has considered these objections in detail and identified where officers reach different professional conclusions.
447. The development of the proposals has sought to respond to consultee comments as far as possible through amendments. These included alterations to the massing of the roof extension with the removal of the three guestrooms to taper the building envelope to increase its set back from the building line of the heritage assets, a change in the colouration from jet black to charcoal grey to soften its appearance in addition to the inclusion of increased greening to the plant screen to provide visual contrast between the expressive roof line and plant. Furthermore, the amendments also included a strengthening of the identity of the former St

Paul's Tavern Public House and an overview of general repairs to make good damaged fabric at the Hotel.

448. Officers consider that the proposed extension would be a confident, contextual and high-quality architectural response to the historic townscape and listed buildings within the site, the surrounds and the Brewery and Chiswell Street Conservation Areas, which would continue to be appreciated as a distinctive enclave in a dynamic area of London. The proposals would demonstrate how new additions to historic buildings need not necessarily be overly cautious or servile, but that such additions can, with the right contextual underpinning, instead possess an authenticity and spirit of their own, whilst coexisting harmoniously, even charismatically, with the historic buildings from which they grow.
449. Overall, officers conclude the proposed extensions and related external and internal alterations through direct and indirect impacts would sustain and preserve the significance of relevant heritage assets, their settings and the special architectural and historic interest which they possess and comply with heritage policies and guidance Local Plan Policies CS12, DM 12.1, DM12.2 DM 12.3, CS13 draft City Plan 2040 policies S11 and S13 and London Plan HC1 and with the objectives set out in Section 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF 2024 policies. The character and appearance of the conservation area within which the site lies and the adjacent conservations areas will be preserved or enhanced.
450. The proposals would also constitute good design reinforcing local distinctiveness delivering a high quality hotel refurbishment in close proximity to several cultural attractions which would contribute to the Destination City objectives and contribute to the rejuvenation of the North of the City, enhancing the distinctive and mixed character of this dynamic and evolving neighbourhood and comply with Local Plan Policies CS10, DM 10.1, DM10.2, DM10.5, DM10.8 and CS5; Emerging City Plan 2040 DE2, S23 and London Plan Policies D3 and D4, D5 in addition to the policies contained in the NPPF 2024 and the National Design Code.
451. It is noted that two objections have been received around noise, disturbance, impacts to residential amenity and traffic. This report has considered these impacts, including any requisite mitigation which would be secured by conditions. The Environmental Health team were consulted and recommended a series of conditions to control the noise levels generated by the operation of the intensification of the hotel use, the plant room at roof level and servicing. Negative impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with

planning conditions would minimise any adverse impacts. Therefore, it is considered the proposed development complies with local plan policies regarding impact on amenity.

452. In terms of daylight, sunlight and overshadowing impacts, the proposed buildings would not deviate significantly from the existing massing. The majority of the surrounding properties would not experience any noticeable reductions. The necessary assessment has been undertaken and the impact of the proposed massing largely complies with the default BRE criteria. Whilst there are localised impacts, in each case these are reasonable and compare favourably with appropriate urban daylight levels. The overshadowing of the neighbouring amenity areas will be negligible and compliant with the BRE guidelines. The proposed development is considered to be acceptable with regards to nearby dwellings, in accordance with the requirements of London Plan policy D6, Local Plan Policy DM10.7 and Policy DE7 of the draft City Plan 2040. Considering the site's urban context, acceptable living standards would be maintained.
453. The proposed development would provide a more inclusive, inviting, and animated hotel experience. Step free access will be provided from Chiswell Street with an improved experience through the hotel and improved choice of hotel rooms for a range of users complying with policy D5 of the London Plan, Local Plan Policy DM10.8 and draft City Plan 2040 Policy HL1.
454. In term of public transport provision, the site has the highest level of public transport accessibility level (PTAL) of 6B. The site is well-located for travel via public transport, including primary trips to / from the hotel and those during a guests' stay. The proposal will have minimal impact on the site access and the local highway network, as the majority of all movements are by active and sustainable travel. Although there may small number of additional trips by vehicle for guest arrivals and departures, these are likely to be pick-up and drop-off trips by taxi, which reflects the current scenario. The general means of access at the site would remain consistent with the existing layout of the site, with delivery and servicing activities accommodated via Milton Street. It is not expected that there would be a material difference in delivery and servicing frequencies, at the site when compared to the existing activities. The likely impact of the proposals would be a small increase in delivery / servicing durations, with no additional trips to be generated. The existing loading arrangements at the site would be maintained.
455. In regards to cycle parking, given the proposed scale of the development, it is considered that the existing provisions would be sufficient to accommodate any nominal increases in the demand for cycle parking locally. As mentioned, there is no space available within the site curtilage to provide additional cycle parking. There are dedicated on-street cycle parking spaces, e-scooter and e-bike docking stations along Milton Street.

456. In regards to sustainability, the proposed development would deliver a high quality, all-electric and energy efficient development that goes over and above policy requirements for minor applications and achieves more ambitious targets associated with minimum requirements for major developments. The building 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 emerging City Plan 2040 policy DE1. Additionally, the proposals meet the London Plan policy SI2 target of 35% operational carbon emission savings compared to the existing building performance in accordance with Part L 2021 and demonstrate the implementation of various measures to reduce operational energy demand, with further exploration of opportunities proposed at later design stages.
457. In terms of fire safety, the proposal integrates a series of measures to control fire and keep people in safety until they egress. City’s District Surveyor has reviewed the submitted Fire Statement and raised no objections.
458. The scheme would provide benefits through CIL to be used towards the provision, improvement, replacement, operation or maintenance of infrastructure which supports the development of the City. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.
459. The proposals are considered to be in accordance with the development plan when taken as whole.
460. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
461. It is the view of officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

## **Background Papers**

### **Consultee Responses**

#### **Internal Consultations**

No Objections, subject to condition - Email from Pollution team dated 05.9.2024, 04.12.2024,

No Objections, subject to condition - Email from Air Quality team dated 29.08.2024, 09.09.2024, 04.02.2024

No Objections - Email from Cleansing Team dated 14.09.2024, 30.11.2024

No Objections, subject to condition - Email from Access Team dated 26.03.2025

No comments – Email from District Surveyor office dated 17.04.2025

#### **External Consultations (24/00863/FULL & 24/00864/LBC)**

- Objection, Georgian Group, 27<sup>th</sup> September 2024 & 23<sup>rd</sup> December 2024
- Objection to 24/00863/FULL & 24/00864/LBC, Historic England, 16<sup>th</sup> October 2024 & 19<sup>th</sup> December 2024 Letter of authorisation to 24/00864/LBC Historic England 19 December 2024
- Neutral, The Gardens Trust, 20<sup>th</sup> December 2024

#### **External Consultation (24/00863/FULL only)**

- Objection, City of London Conservation Area Advisory Committee, 11<sup>th</sup> October 2024

### **Consultation Responses**

#### **Consultation Responses (24/00863/FULL & 24/00864/LBC)**

- Objection, Mr Fred Rogers, 17<sup>th</sup> September 2024 & 15<sup>th</sup> January 2025
- Objection, London & Middlesex Archaeological Society, 30<sup>th</sup> September 2024 & 24<sup>th</sup> February 2025
- Objection, Historic Buildings & Places, 25<sup>th</sup> September 2024 & 19<sup>th</sup> December 2024
- Objection, Society for Protection of Ancient Buildings, 2<sup>nd</sup> October 2024 & 6<sup>th</sup> January 2025

#### **Consultation Responses (24/00863/FULL only)**

- Objection, Mr David Coleman, 6<sup>th</sup> September 2024
- Objection, Mr Andrew Vergottis, 20<sup>th</sup> December 2024
- Objection, Dr Alison Edwards, Council for British Archaeology, 25<sup>th</sup> September 2024 & 19<sup>th</sup> December 2024
- Objection, Miss Amber Patrick - Association for Industrial Archaeology, 25<sup>th</sup> September 2024

### **Application Documents:**

- Completed Planning Application Form, prepared by DP9;
- CIL Form, prepared by DP9;
- Covering Letter, prepared by DP9, dated 13.08.2024, 24.11.2024, 11.04.2025
- Site Location Plan, prepared by EPR Architects;
- Site Plan, prepared by EPR Architects;
- Drawing Schedule, prepared by EPR Architects;
- Planning statement/ Planning Statement Addendum prepared by DP9 dated 13.08.2024, 24.11.2024
- Design and Access Statement/ Design and Access Statement addendum prepared by EPR Architects dated August 2024, November 2024
- Transport Statement prepared by RGP Consulting Engineers dated 06.08.2024, 10.04.2025, 17.04.2025.
- Daylight and Sunlight overshadowing Assessment V3/ Daylight and Sunlight overshadowing Assessment V4 addendum prepared by Point 2 dated 24.07.2024, 22.11.2024
- Plant Noise Assessment prepared by Pillar Consulting dated 06.08.2024
- Townscape, Heritage and Visual Impact Assessment/ Townscape, Heritage and Visual Impact Assessment Addendum prepared by KM Heritage dated August 2024, November 2024.
- Sustainable Design Statement/ Sustainable Design Statement Addendum prepared by Introba dated 09.08.2024/ 21.11.2024.
- Preliminary Ecological Appraisal prepared by Focus Dated August 2024
- Outline Hotel Management Plan prepared by Montcalm Collection dated July 2024
- Construction Management Plan/ Construction Management Plan addendum prepared by Syntegra Consulting dated 06.08.2024, 21.11.2024
- Statement of Community Involvement prepared by Concilio dated August 2024
- Biodiversity Net Gain: Statement of Exemption prepared by Focus dated 07.08.2024
- Fire Planning Statement prepared by Pilar Consulting dated 31.03.2025
- Montcalm at The Brewery - Indicative schedule of repairs to be carried out as part of the project to refurbish and extend the Hotel dated 26.11.24
- Existing Plans:
  - 11602-EPR-00-GF-DR-A-TP001 – SITE PLAN
  - 11602-EPR-00-MZ-DR-A-TP0230M - EXISTING ROOF PLAN OVERVIEW
  - 11602-EPR-00-RF-DR-A-TP0106 - EXISTING ROOF PLAN OVERVIEW
  - 11602-EPR-00-ZZ-DR-A-TP0400 - EXISTING CHISWELL ST ELEVATION
  - 11602-EPR-00-ZZ-DR-A-TP0401 - EXISTING COURTYARD ELEVATION
  - 11602-EPR-00-ZZ-DR-A-TP0402 - EXISTING EAST WING ELEVATIONS
  - 11602-EPR-00-ZZ-DR-A-TP0403 - EXISTING WEST WING ELEVATIONS
  - 11602-EPR-00-ZZ-DR-A-TP0404 - EXISTING WEST WING ELEVATIONS
  - 11602-EPR-00-MZ-DR-A-TP0100M - EXISTING MEZZANINE FLOOR PLAN OVERVIEW
  - 11602-EPR-00-B1-DR-A-TP0099 - EXISTING BASEMENT FLOOR PLAN OVERVIEW
  - 11602-EPR-00-GF-DR-A-TP0100 - EXISTING GROUND FLOOR PLAN OVERVIEW
  - 11602-EPR-00-EL-DR-A-TP0427 - EXISTING CHISWELL STREET BUILDING FRONTAGE





## **APPENDIX A**

### **Relevant London Plan Policies**

- Policy GG1 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
- 1. Policy D3 Optimising site capacity through the design-led approach
- 2. Policy D4 Delivering Good Design
- 3. Policy D5 Inclusive Design
- 4. Policy D11 Safety, security and resilience to emergency
- 5. Policy D12 Fire Safety
- 6. Policy D14 Noise
- 7. Policy E9 Retail, markets and hot food takeaways
- 8. Policy E10 Visitor infrastructure
- 9. Policy E11 Skills and opportunities for all
- 10. Policy HC1 Heritage conservation and growth
- 11. Policy HC2 World Heritage Sites
- 12. Policy HC3 Strategic and Local Views
- 13. Policy HC4 London View Management Framework
- 14. Policy HC5 Supporting London's culture and creative industries
- 15. Policy HC6 Supporting the night-time economy
- 16. Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure
- 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 SI13 Sustainable drainage
- Policy T1 Strategic approach to transport
- 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
- Policy T9 Funding transport infrastructure through planning

### **Relevant GLA Supplementary Planning Guidance (SPG/LPG):**

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Planning for Equality and Diversity in London SPG (October 2007);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Transport, Walking and Cycling LPG (November 2022)
- Sustainable Design and Construction SPG (September 2014);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- London World Heritage Sites SPG (March 2012);
- Social Infrastructure SPG (May 2015);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016);
- Mayor's Transport Strategy (2018);
- Public London Charter LPG (September 2021);
- Optimising Capacity – A Design Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023);
- Characterisation and Growth Strategy LPG (June 2023); and
- Draft Fire Strategy LPG (February 2022).

### **Relevant Emerging City Plan 2040 policies**

- Draft Strategic Policy S1: Health and Inclusive City
- Draft Policy HL1: Inclusive buildings and spaces
- Draft Policy HL2: Air quality
- Draft Policy HL3: Noise
- Draft Policy SA1: Publicly accessible locations
- Draft Policy HS3: Residential Environment
- Draft Strategic Policy S5 Retail and Active Frontages
- Draft Policy RE2 Active Frontages
- Draft Policy RE3 Specialist Retail Uses and Clusters
- Draft Strategic Policy S6: Culture and Visitors
- Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Draft Policy CV3: Provision of Visitor Facilities
- Draft Policy CV5 Evening and Night-Time Economy
- Policy S7: Infrastructure and Utilities
- Draft Policy N1 Infrastructure Provision and Connection
- Draft Policy IN1: Infrastructure Capacity
- Draft Strategic Policy S8: Design
- Draft Policy DE1: Sustainable Design
- Draft Policy DE2: Design Quality
- Draft Policy DE5 Shopfronts
- Draft Policy DE6 Advertisements
- Draft Policy DE7: Daylight and Sunlight
- Draft Policy DE8: Lighting
- Draft Strategic Policy S9: Transport and Servicing
- Draft Policy VT1: The impacts of development on transport

- Draft Policy VT2 Freight and Servicing
- Draft Policy VT3: Vehicle Parking
- Draft Strategic Policy S10: Active Travel and Healthy Streets
- Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Draft Policy AT2: Active Travel including Cycling
- Draft Policy AT3: Cycle Parking
- Draft Strategic Policy S11: Historic Environment
- Draft Policy HE1: Managing Change to Historic Environment Development
- Draft Policy HE2: Ancient Monuments and Archaeology
- Draft Policy HE3: Setting of the Tower of London World Heritage Site
- Draft Strategic Policy S13: Protected Views
- Draft Policy OS2: City Urban Greening
- Draft Policy OS3: Biodiversity
- Draft Policy OS4: Biodiversity Net Gain
- Draft Strategic Policy S15: Climate Resilience and Flood Risk
- Draft Policy CR1: Overheating and Urban Heat Island Effect
- Draft Policy CR2: Flood Risk
- Draft Policy CR3 Sustainable Drainage Systems (SuDs)
- Draft Policy CR4 Flood Protection and Flood Defences
- Draft Strategic Policy S16: Circular Economy and Waste
- Draft Strategic Policy S21: City Cluster Key Area of Change
- Draft Strategic Policy S26 Planning Contributions

#### **Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)**

- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines 2020
- Wind Microclimate Guidelines, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- Planning Obligations SPD 2021
- Protected Views SPD, January 2012
- City Transport Strategy October 2024

## **Relevant Local Plan Policies**

### ***CS2 Facilitate 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.

#### ***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.

### ***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.

### ***CS4 Seek planning contributions***

To manage the impact of development, seeking appropriate developer contributions.

### ***CS10 Promote high quality environment***

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.

### ***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.

### ***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.

### ***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.

#### ***DM12.2 Development in conservation areas***

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

#### ***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.

#### ***CS13 Protect/enhance significant 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 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.

#### ***DM15.1 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 non-domestic 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 on-site 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.

### ***CS16 Improving transport and travel***

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.

### ***DM16.3 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.

### ***CS17 Minimising and managing 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).

#### ***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 recycle 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

### ***CS18 Minimise flood risk***

To ensure that the City remains at low risk from all types of flooding.

#### ***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.

### ***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.

### ***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.

### ***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.

### ***CS22 Maximise community facilities***

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.

#### ***DM22.1 Social and community facilities***

1. To resist the loss of social and community facilities unless:
  - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
  - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
  - c) 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:
  - a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
  - b) in locations which are convenient to the communities they serve;
  - c) in or near identified residential areas, providing their amenity is safeguarded;
  - d) 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.



## **SCHEDULE**

**APPLICATION: 24/00863/FULL**

**Hotel, The Whitbread Brewery, 52 Chiswell Street, London, EC1Y 4SA**

**Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; and associated works.**

**Re-consultation due to updated drawings.**

### **CONDITIONS**

#### **Time Limit**

1. The development hereby permitted shall be begun before the expiration of five 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.

#### **Demolition**

2. 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.

## **Construction**

3. 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.

## **Noise**

4. (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

### **Mechanical Plant Mounting**

5. 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.

### **NRMM**

6. 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.

### **Stair Lift**

7. Before any works thereby affected are begun, details of the new retractable stair lift including maintenance strategy, signage, access controls and materiality shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.

REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. 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.

## **Accessibility Details**

8. Before any construction 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) Details of all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate;
  - b) Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20;
  - c) Details of hotel reception including details of sanitary facilities and seating;
  - d) Details of all accessible room furniture layouts at a scale no less than 1:20;
  - e) Details of the location of all accessible WC, ambulant WC, baby changing facilities;
  - f) Details of internal improvements to horizontal and vertical movement routes through the existing fabric including but not limited to location and dimension of passing points, floor and wall contrast, visual contrast on steps and location of handrails;

REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.

## **Inclusive Access Management Plan**

9. Prior to the occupation of the extension hereby approved, an Inclusive Access Management Plan 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 which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for:
  1. Website information including photos and an easy read version with information on:
    - a) Travel distances in metres from key step-free points of arrival including identified rest points at intervals of no more than 50m

b) Location of dropped kerbs

c) Sanitary facilities

d) Facilities available on-site including dimensions and photos for (as appropriate):

- i. entrances and lift access
- ii. controlled entry points
- iii. accessible toilets including protocol for access to Radar key if applicable
- iv. baby changing facilities
- v. equipment loan
- vi. room for reflection/quiet
- vii. facilities for assistance animals
- viii. assistive listening system and other assistive technology
- ix. plant species

2. Inclusive Entrances Strategy

3. Booking Strategy for accessible rooms including information on the website on:

- a. Room dimensions
- b. Travel distances from reception and other facilities
- c. Where there are options for connecting rooms

4. Management plan for staff training on disability awareness including frequency

5. Management plan for Personal Emergency Escape Plans for building users including staff training and guidance

The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.



REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.

### **Travel Plan**

10. Prior to occupation of the extension hereby approved, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall specifically set out:

- Information about the Red Badge parking scheme for eligible occupiers
- Details of alternative transport arrangements where on-street parking cannot accommodate full-day parking needs
- Identification of accessible routes to and from concession public transport nodes

The development shall thereafter be operated in accordance with the approved Travel Plan (or any amended Plan that may be approved from time to time by the Local Planning Authority) for the lifetime of the development.

REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides an inclusive and accessible environment that adequately supports disabled persons accessing and using the development and accords with Policies DM10.8 and DM16.1 of the Local Plan and Policy D5 of the London Plan

### **Emergency Power Supply**

11. Prior to the relevant works, 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.

REASON: To demonstrate that operational carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policies S8, DE1.

### **Ecological Features Plan**

12. Prior to the commencement of landscaping works, details of the following proposed ecological enhancement features shall be submitted and approved by the Local Planning Authority:

A minimum of two open-fronted nest boxes installed within the land ownership of the site post-development

New soft-landscaping proposals including the creation of green roof habitat, with a focus on providing a diverse range of wildflowers and grasses to maximise the value of green roofs for invertebrates and insectivorous birds

The inclusion of invertebrate boxes on green roofs and refugia to provide additional invertebrate habitat

The details should specify how the ecological features will be created and maintained. The ecological enhancement features shall be carried out and so maintained.

RREASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2 and emerging City Plan 2040 policy OS3 Biodiversity.

### **BREEAM**

13. 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 DE

### **Carbon Reduction Measures**

14. Prior to the commencement of the development, excluding demolition and enabling works, a detailed assessment of measures undertaken to reduce carbon emissions throughout the whole life cycle of the development shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: : CS15, DM15.1, DM15.2

### **Waste water heat recovery**

15. Prior to the commencement of the development, excluding demolition and enabling works, an assessment of opportunities to incorporate waste water heat recovery to reduce energy demand for space and water heating including details of the proposed measures shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To assist the environmental sustainability of the development and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.2 DM15.5

### **Restricting Hours of Delivery and Servicing**

16. No deliveries and servicing trips to the premises shall be carried out between the hours of 7:00 to 9:00 and 16:00 to 18:00, Monday to Sunday, including Bank Holidays.

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: CS16, DM15.7, DM16.2, DM 16.1, DM21.3

### **Site Condition Survey**

17. Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and detailed report of the findings must be submitted to and approved in writing by the local planning authority. Proposed threshold levels at finished floor levels (highways boundary) and levels at basement in relation to existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

## Demolition and Construction Management Plan

18. 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 prior to the commencement of work. The details shall be completed in accordance with the latest guidance, 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. No demolition or construction shall be carried out other than in accordance with the approved details and methods. The Demolition and Construction Management Plan to include:
- Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.
  - Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing.
  - Construction vehicle routes to and from the site to be approved with CoL Highways
  - Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
  - construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request.
  - encouraging the use of cargo bike deliveries throughout the construction process.
  - Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.
  - A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required.
  - The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: <http://www.clocs.org.uk/standard-for-clocs/>.

REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimized from the time that demolition and construction starts

Maximum Heights

19. The maximum height of the proposed roof extension on the eastern wing shall comply with the approved drawings and shall not exceed 40.3m AOD including plant, flues, lift over run, and other excrescences at roof level. The maximum height of the proposed plant on the mash house shall comply with the approved drawings and shall not exceed 43.610m AOD including plant, flues, lift over run, and other excrescences at roof level.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1

### **Protection of Historic Features**

20. During the works, if hidden historic features of heritage significance are revealed they should be retained in-situ. Works shall be halted in the relevant area of the building and the Local Planning Authority should be notified 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.

Works to Match Existing

21. All new works and finishes and works of making good to the retained historic 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.

### **Structural Stability**

22. The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of fixing scaffolds and 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.

### **Construction Contracts**

23. No external part of the building(s) shall be demolished before a contract or series of contracts have been made for the carrying out of substantial works of redevelopment as authorised by this Listed Building Consent and the associated Planning Permission. Such contracts shall include the construction of all foundations, above ground framework and floor structures.

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.

### **Photographic Survey**

24. Before any works hereby consented are begun, a full survey including photographic record of the exterior and interior of the buildings shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure a suitable record is kept of this version of the building in accordance with the following policies of the Local Plan: CS12, DM12.1, DM12.3.

### **Deconstruction Method Statement**

25. No external demolition works shall commence on site until a detailed deconstruction method statement has been submitted to and approved in writing by the Local Planning Authority, which includes details of structural monitoring and protection / preservation of historic features and fabric of the subject site and including surrounding designated heritage assets. The development shall be deconstructed in accordance with the statement as approved. Should any repairs be required these should be undertaken by the developer in consultation with the Local Planning Authority and taking into consideration any listed building legislation.

REASON: To ensure the preservation of historic building features and fabric of designated assets, including those adjoining the site, in accordance with the following policies of the Local Plan: DM12.3.

### **Protection of Historic Features and Fabric**

26. Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect original external and internal features of the designated heritage assets during the building work. These shall remain in place for the duration of the construction/ alteration work hereby permitted.

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: CS12, DM12.1, DM12.3.

### **Heritage Protection Methodology**

27. Before any works hereby consented are begun, details of the following shall be prepared by a suitably qualified professional and submitted to and approved in writing by the Local Planning Authority:

(a) a full methodology for the proposed works, including a heritage method statement and a schedule of all proposed works;

(b) detailed condition survey of the buildings;

(c) details, including method statement for works to unveil the potential survival of original or historic features, underneath existing modern fabric.

All works pursuant to this consent must be carried out in accordance with the approved details.

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3.

### **Protection of Historic Windows**

28. Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect the windows during the building work, particularly the historic window glass. The agreed measures shall be carried out in full. No such features shall be disturbed or damaged or removed temporarily or permanently to facilitate protection except as indicated on the approved drawings or with prior approval in writing. Any intact historic window glass damaged during the building work shall be reported to the Local Planning Authority and shall be replaced like-for-like from a suitable approved source.

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: CS12, DM12.1, DM12.3.

### **Construction Method Statement**

29. No construction works shall commence on site until a detailed construction method statement has been submitted to and approved in writing by the Local Planning Authority, which includes details of structural monitoring and protection / preservation of historic features and fabric of the subject



site and including surrounding designated heritage assets. The development shall be constructed in accordance with the statement as approved. Should any repairs be required these should be undertaken by the developer in consultation with the Local Planning Authority and taking into consideration any listed building legislation.

REASON: To ensure the preservation of historic building features and fabric of designated assets, including those adjoining the site, in accordance with the following policies of the Local Plan: DM12.3.

### **Listed Building Repairs**

30. 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) comprehensive schedule and specification of internal and external repairs including, and not limited too, those provided within the indicative submitted schedule; and

(b) Details, including a heritage method statement and samples of materials, of repair works to historic fabric (including both internal and external cleaning).

REASON: To ensure 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: DM12.3.

### **Design Details – External**

31. 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) Particulars and samples including junctions, joints, colour and texture finishes of the materials to be used on all external surfaces of the building including external ground level and upper level surfaces including all layer components of the cladding system proposed for roof extensions;

(b) Construction of sample façade panels of agreed sections at agreed scales of the proposed façade of the roof extension including all layered components of the cladding system;

- (c) Details of apexes and eaves of the roof extension including joints between different roof forms;
- (d) Details of interfaces and junctions of extensions with existing listed buildings;
- (e) Details of the proposed new shopfronts, including details of the fenestration, entrances and detailing at a scale of no less than 1:20;
- (f) Details of new windows, including framing, colours, junctions and integrated window box planters;
- (g) Details of signage for all aspects of the building, including the restoration of the historic St Paul's Tavern fascia and hanging signage;
- (h) Details of rooftop including plant equipment, screening, planting and other infrastructure;
- (i) Details of all drainage and irrigation;
- (j) Details of the integration of M&E and building services into the external envelope;
- (k) Details of external ducts, vents, louvres and extracts;
- (l) Details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- (m) Details of access to the roof for cleaning and maintenance, including details of mansafe equipment; and
- (n) Details of any soffits, privacy screens, handrails and balustrades.

REASON: To ensure 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: DM12.3.

### **Lighting Strategy**

32. Prior to the commencement of the relevant works, a full Lighting Strategy shall be prepared in accordance with the adopted City of London Lighting SPD and 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 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, DM12.2, DM12.3, DM15.7 and City of London Lighting Strategy SPD.

### **Planting**

33. All unbuilt surfaces, including roof level planting and window plant boxes, shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. 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. Vegetation which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with vegetation of similar 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: DM10.1 .

### **Completion of Listed Building Repairs & Works**

34. No occupation or operation of the new extension shall take place until a full schedule of complete repairs including photographs and details to the listed building has been submitted too and approved in writing by the Local Planning Authority. These repairs should include those listed in the application, in addition to any other repairs required during the works.

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.

## Approved Drawings

35. 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:

### Indicative Planting:

11602-EPR-01-EL-DR-A-TP0432 rev P02 - INDICATIVE EAST WING ELEVATIONS PLANTING

11602-EPR-00-RF-DR-A-TP0308 rev P02 - INDICATIVE ROOF PLAN PLANTING

11602-EPR-00-ZZ-DR-A-TP0431 rev P02 - INDICATIVE COURTYARD NORTH ELEVATION PLANTING

11602-EPR-00-03-DR-A-TP0307 rev P01 - INDICATIVE THIRD FLOOR PLAN PLANTING

### Sections:

11602-EPR-00-ZZ-DR-A-TP0503 rev P02 - Existing, Demolition and Proposed Section D-D - Through Carriageway

11602-EPR-00-ZZ-DR-A-TP0502 rev P02 - Existing, Demolition and Proposed Section C-C - Through Lightwell

11602-EPR-00-ZZ-DR-A-TP0501 rev P02 - Existing, Demolition and Proposed Section B-B - Through New Entrance

11602-EPR-00-ZZ-DR-A-TP0500 rev P02 - Existing, Demolition and Proposed Section A-A - Through East Wing

11602-EPR-00-ZZ-DR-A-TP-0504 rev P01- Existing, Demolition and Proposed Section E-E – Through Southwest Wing

### Elevations:

11602-EPR-00-ZZ-DR-A-TP0422 rev P02 - PROPOSED EAST WING ELEVATIONS

11602-EPR-00-ZZ-DR-A-TP0420 rev P02 - PROPOSED CHISWELL ST ELEVATION

Proposed Courtyard North Elevation 11602-EPR-00-ZZ-DR-A-TP0421 rev P02

11602-EPR-00-EL-DR-A-TP0423 – rev P01 - PROPOSED WEST WING ELEVATIONS

11602-EPR-00-EL-DR-A-TP0424 – rev P01 - PROPOSED WEST WING ELEVATIONS

Demolitions:

Demolition Chiswell St. Elevation 11602-EPR-00-EL-DR-A-TP410 rev P02

Demolition Courtyard North Elevation 11602-EPR-00-EL-DR-A-TP411 rev P02

Demolition East Wing Elevations 11602-EPR-00-EL-DR-A-TP412 rev P02

Demolition West Wing Elevations 11602-EPR-00-EL-DR-A-TP413 rev P02

Floorplans:

11602-EPR-00-B1-DR-A-TP0299 rev P01 – PROPOSED BASEMENT FLOOR PLAN OVERVIEW

11602-EPR-00-RF-DR-A-TP0336 rev P02 - WING B PROPOSED ROOF FLOOR PLAN

11602-EPR-00-RF-DR-A-TP0326 rev P02 - WING A PROPOSED ROOF FLOOR PLAN

11602-EPR-00-RF-DR-A-TP0306 rev P02 - PROPOSED ROOF FLOOR OVERVIEW

11602-EPR-00-05-DR-A-TP0305 rev P02 - PROPOSED FIFTH FLOOR PLAN OVERVIEW

11602-EPR-00-04-DR-A-TP0324 rev P03 - WING A PROPOSED FOURTH FLOOR PLAN

11602-EPR-00-04-DR-A-TP0304 rev P03 - PROPOSED FOURTH FLOOR PLAN OVERVIEW

11602-EPR-00-03-DR-A-TP0323 rev P03 - WING A PROPOSED THIRD FLOOR PLAN

11602-EPR-00-03-DR-A-TP0303 rev P03 - PROPOSED THIRD FLOOR PLAN OVERVIEW

11602-EPR-00-02-DR-A-TP0302 rev P01 - PROPOSED SECOND FLOOR PLAN OVERVIEW

11602-EPR-00-01-DR-A-TP0301 rev P02 - PROPOSED FIRST FLOOR  
PLAN OVERVIEW

11602-EPR-00-MZ-DR-A-TP0300M rev P01 - PROPOSED MEZZANINE  
FLOOR PLAN OVERVIEW

11602-EPR-00-GF-DR-A-TP0300 rev P02 - PROPOSED GROUND  
FLOOR PLAN OVERVIEW

11602-EPR-00-GF-DR-A-TP0320 rev P01 - WING A PROPOSED  
GROUND FLOOR PLAN

11602-EPR-00-GF-DR-A-TP0330 rev P01 - WING B PROPOSED  
GROUND FLOOR PLAN

11602-EPR-00-01-DR-A-TP0331 rev P01 - WING B PROPOSED FIRST  
FLOOR PLAN

REASON: To ensure that the development of this site is in compliance with  
details and particulars which have been approved by the Local Planning  
Authority.

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<b>Committee:</b>	<b>Date:</b>
Planning Applications Sub Committee	6 <sup>th</sup> May 2025
<b>Subject:</b> Montcalm Hotel, Whitbread Brewery, 52 Chiswell Street, London EC1Y 4SY  Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.	<b>Public</b>
<b>Ward:</b> Coleman Street	<b>For Decision</b>
<b>Registered No:</b> 24/00864/LBC	<b>Registered on:</b> 13 August 2024
<b>Conservation Area:</b> The Brewery	<b>Listed Buildings:</b> Grade II* & Grade II

### Summary

Listed Building Consent is sought for partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.

The proposed development is located at the Montcalm Hotel at the Brewery, which comprises a collection of listed buildings that form part of the former Whitbread Brewery complex on the southern side of Chiswell Street. The site sits on the northern boundary of the City of London, abutting the London Borough of Islington. Silk Street runs to the west of the site, Milton Street to the east with additional buildings forming the rest of the Brewery complex sitting to the south – these are used as conference and events venue which is under a separate ownership to the Hotel and are not subject to the proposals presented within this application.

The site comprises 8 listed buildings, all listed at Grade II with the exception of the Grade II\* Partners House, dated between 1700 and 1900. A further six Grade II listed

buildings are located within the immediate surrounding vicinity of the site, forming the remaining elements of the Whitbread Brewery complex which are not within the site boundary. The site is also located within the Brewery Conservation Area, and sits adjacent to the Chiswell Street Conservation Area (within the London Borough of Islington) and the Barbican and Golden Lane Estates Conservation Area.

The proposed development seeks to refurbish and upgrade the hotel to retain its status as a leading heritage hotel within the City of London with an enhanced visitor experience including improved quality of accommodation, amenity offering, enhanced inclusive access and a more sustainable operation. The proposals would result in an uplift of 8 bedrooms, an increase in the total number of rooms within the Hotel from 213 to 221 alongside new and improved bar, restaurant, lounge and events space at ground floor for the public and guests to use.

As part of the proposals, an existing non-original modern brick roof extension over the eastern wing of the Hotel is to be demolished. This extension is considered to be architecturally awkward and responds poorly to the heritage assets it sits above, whilst internally the extension is not accessible for a range of users, with level changes requiring navigation up and down steps and movement along narrow and disorientating corridors. Furthermore, the extension contains ad-hoc visible plant and has non-compliant fire escape routes on the fourth floor when considering present building safety standards.

A new larger 2 storey roof extension would replace these incoherent, dated additions with a compelling new architectural statement which would be clearly distinct but also compatible with the heritage assets below and the wider Brewery complex. The proposed architecture would be a striking, sophisticated, contemporary statement, evocative of the industrial history of the site. Importantly, the extensions would sit as part of a wider comprehensive upgrade of the Hotel which would future-proof the operation of the hotel and enhance the sustainability credentials of the buildings, improve inclusive access and provide renewed animation and activation to Chiswell Street.

Other improvements include works to the shopfronts along Chiswell Street to improve activation and animation to provide a stronger connection between the public facing areas of the Hotel and the street; a refurbishment of guestrooms at the upper floors; creation of a new gym and meeting room facilities; and new plant. The works would reveal internal features of heritage interest such as vaulted ceilings, iron pillars and skylights which had been covered in previous unsympathetic refurbishments.

A total of 5 no. of objections have been received for the listed building consent application. This includes objections from Historic England, the Georgian Group and the Society for the Preservation of Ancient Buildings. The objections primarily relate to (but not limited to) the appropriateness of the architectural treatment of the

proposals; the bulk, scale, height and massing of the proposals; the sense of overbearing; and the impacts on the character and appearance on both the Brewery and Chiswell Street Conservation Areas.

In response to these objection comments and Officer feedback, the original submission was revised and amended plans and supporting documentation were received on 25th November 2024. The amendments included alterations to the massing of the roof extension with the removal of three guestrooms to taper the building envelope to increase its set back from the building line of the heritage assets, a change in the colouration from jet black to charcoal grey to soften its appearance in addition to the inclusion of increased greening to the plant screen to provide visual contrast between the expressive roof line and plant. Furthermore, the amendments also included a strengthening of the identity of the former St Paul's Tavern Public House and an overview of general repairs to make good damaged fabric at the Hotel.

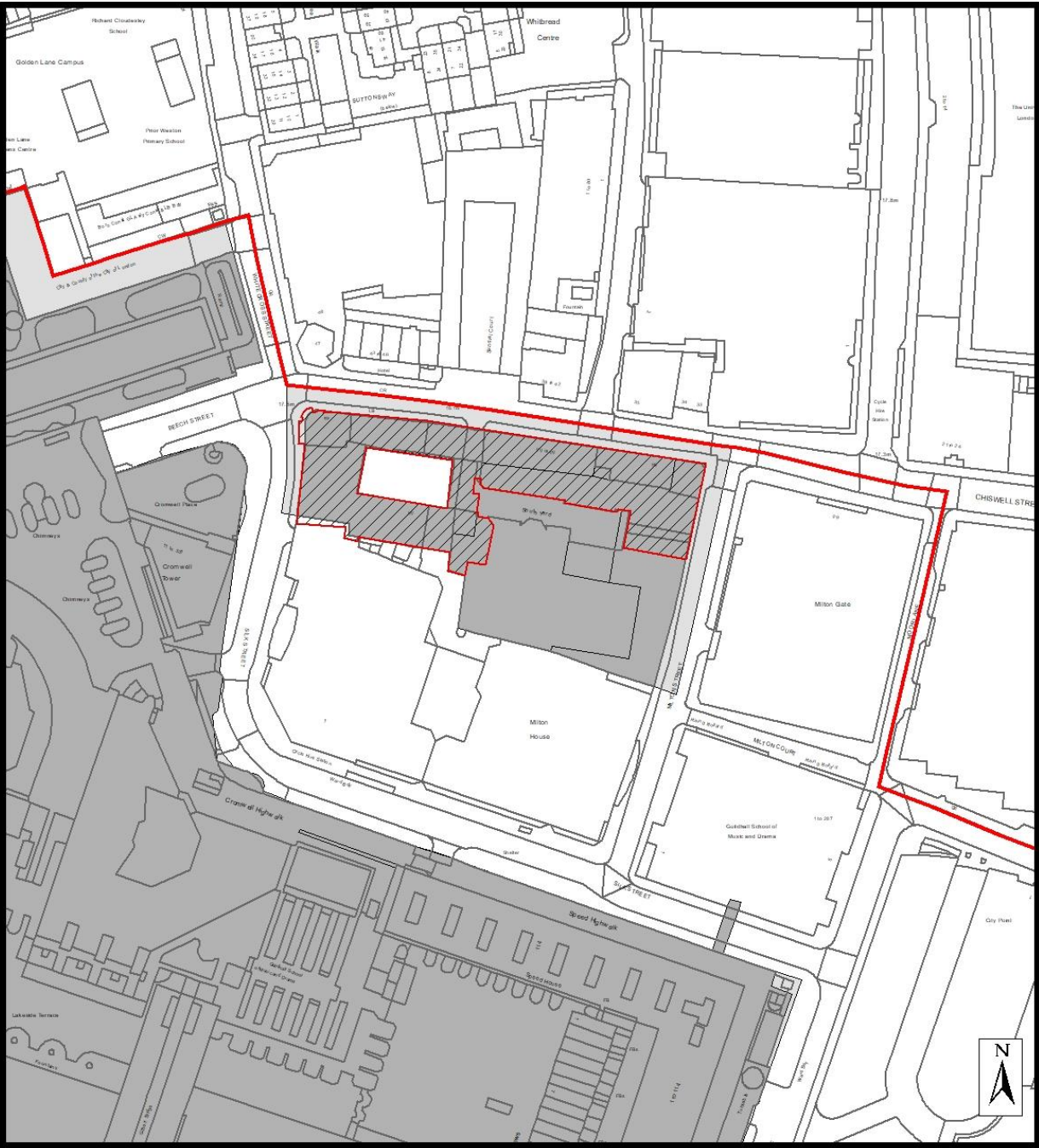
Officers consider that the proposed development would not result in any harm to the significance of the designated heritage assets that make up the site and the surroundings, whether directly through fabric alteration, or indirectly by means of visual change to their settings. Whilst clearly modern, the extension would in fact be contextual, in that it would be of an expressive, industrial architectural character that would suavely evoke the operational history of the site as a Brewery, that crucial context from which the buildings of the site and their significance ultimately derived. It would be clearly set back from the frontages of the listed buildings to an appropriately deferential extent and in architectural character would be clearly disassociated from them, resulting in a fascinating juxtaposition, one that would actually accentuate and more clearly define the polite frontages of the listed buildings below.

Officers consider that the proposed extension would be a confident, contextual and high-quality architectural response to the historic townscape and listed buildings within the site, the surrounds and the Brewery and Chiswell Street Conservation Areas, which would continue to be appreciated as a distinctive enclave in a dynamic area of London. The proposals would demonstrate how new additions to historic buildings need not necessarily be overly cautious or servile, but that such additions can, with the right contextual underpinning, instead possess an authenticity and spirit of their own, whilst coexisting harmoniously, even charismatically, with the historic buildings from which they grow. This conclusion is reached whilst attributing great weight and considerable importance, to the relevant statutory tests under s.16, s.66 and s.72 of the Act.

### **Recommendation**

(1) That Listed Building Consent be granted for the above proposal in accordance with the details set out in the attached schedule.

# Site Location Application Plan



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ADDRESS:  
Whitbread Brewery, 52 Chiswell Street

CASE No.  
24/00864/LBC

-  **SITE LOCATION**
-  **LISTED BUILDINGS**
-  **CONSERVATION AREA BOUNDARY**
-  **CITY OF LONDON BOUNDARY**



ENVIRONMENT DEPARTMENT



## Existing Site Photographs



**Image 1:** The site looking from the east at the junction of Chiswell Street / Bunhill Row with Milton Gate to the left, and Cromwell Tower / 1 Silk Street in the background



**Image 2:** Looking south towards the site, from Lamb's Passage with commercial development on Silk Street in the background





**Image 3:** Looking west along Chiswell Street, where the site meets the junction of Silk Street & Whitecross Street



**Image 4:** Looking north along Milton Street, with the site on the left





**Image 5:** Looking east within the South Yard, with the existing 2 storey extension visible on top of the rear block at the left



**Image 6:** Looking west within the South Yard

## **Main Report**

Please refer to the committee report for 24/00863/FULL



## **Relevant Local Plan 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: **24/00864/LBC**

**Hotel, The Whitbread Brewery, 52 Chiswell Street, London, EC1Y 4SA**

**Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and associated works.**

**Re-consultation due to updated drawings.**

## **CONDITIONS**

### **Time Limit & Notification of Commencement**

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission. Written notification of the start of works on site shall be sent to Historic England, and a copy sent to the City of London Corporation at least seven days before the works hereby approved are commenced.

REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990

### **Protection of Historic Features**

- 2 During the works, if hidden historic features of heritage significance are revealed they should be retained in-situ. Works shall be halted in the relevant area of the building and the Local Planning Authority should be notified 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.

### **Works to Match Existing**

- 3 All new works and finishes and works of making good to the retained historic 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.

### **Structural Stability**

- 4 The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of fixing scaffolds and 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.

### **Construction Contracts**

- 5 No external part of the building(s) shall be demolished before a contract or series of contracts have been made for the carrying out of substantial works of redevelopment as authorised by this Listed Building Consent and the associated Planning Permission. Such contracts shall include the construction of all foundations, above ground framework and floor structures.

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.

### **Photographic Survey**

- 6 Before any works hereby consented are begun, a full survey including photographic record of the exterior and interior of the buildings shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure a suitable record is kept of this version of the building in accordance with the following policies of the Local Plan: DM12.3.

### **Deconstruction Method Statement**

- 7 No external demolition works shall commence on site until a detailed deconstruction method statement has been submitted to and approved in writing by the Local Planning Authority, which includes details of structural monitoring and protection / preservation of historic features and fabric of the subject site and including surrounding designated heritage assets. The development shall be deconstructed in accordance with the statement as approved. Should any repairs be required these should be undertaken by

the developer in consultation with the Local Planning Authority and taking into consideration any listed building legislation.

REASON: To ensure the preservation of historic building features and fabric of designated assets, including those adjoining the site, in accordance with the following policies of the Local Plan: DM12.3.

### **Protection of Historic Features and Fabric**

- 8 Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect original external and internal features of the designated heritage assets during the building work. These shall remain in place for the duration of the construction/ alteration work hereby permitted.

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3.

### **Heritage Protection Methodology**

- 9 Before any works hereby consented are begun, details of the following shall be prepared by a suitably qualified professional and submitted to and approved in writing by the Local Planning Authority:

- (a) a full methodology for the proposed works, including a heritage method statement and a schedule of all proposed works;
- (b) detailed condition survey of the buildings;
- (c) details, including method statement for works to unveil the potential survival of original or historic features, underneath existing modern fabric.

All works pursuant to this consent must be carried out in accordance with the approved details.

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3.

### **Protection of Historic Windows**

- 10 Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect the windows during the building work, particularly the historic window glass. The agreed measures shall be carried out in full. No such features shall be disturbed or damaged or removed temporarily or permanently to facilitate protection except as indicated on the approved drawings or with prior approval in writing. Any intact historic window glass damaged during the building work shall be reported to the Local Planning

Authority and shall be replaced like-for-like from a suitable approved source.

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.

### **Construction Method Statement**

- 11 No construction works shall commence on site until a detailed construction method statement has been submitted to and approved in writing by the Local Planning Authority, which includes details of structural monitoring and protection / preservation of historic features and fabric of the subject site and including surrounding designated heritage assets. The development shall be constructed in accordance with the statement as approved. Should any repairs be required these should be undertaken by the developer in consultation with the Local Planning Authority and taking into consideration any listed building legislation.

REASON: To ensure the preservation of historic building features and fabric of designated assets, including those adjoining the site, in accordance with the following policies of the Local Plan: DM12.3.

### **Listed Building Repairs**

- 12 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) comprehensive schedule and specification of internal and external repairs including, and not limited to, those provided within the indicative submitted schedule; and

(b) Details, including a heritage method statement and samples of materials, of repair works to historic fabric (including both internal and external cleaning).

REASON: To ensure 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: DM12.3.

### **Design Details – External**

- 13 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) Particulars and samples including junctions, joints, colour and texture finishes of the materials to be used on all external surfaces of the building including external ground level and upper level surfaces including all layer components of the cladding system proposed for roof extensions;
- (b) Construction of sample façade panels of agreed sections at agreed scales of the proposed façade of the roof extension including all layered components of the cladding system;
- (c) Details of apexes and eaves of the roof extension including joints between different roof forms;
- (d) Details of interfaces and junctions of extensions with existing listed buildings;
- (e) Details of the proposed new shopfronts, including details of the fenestration, entrances and detailing at a scale of no less than 1:20;
- (f) Details of new windows, including framing, colours, junctions and integrated window box planters;
- (g) Details of signage for all aspects of the building, including the restoration of the historic St Paul's Tavern fascia and hanging signage;
- (h) Details of rooftop including plant equipment, screening, planting and other infrastructure;
- (i) Details of all drainage and irrigation;
- (j) Details of the integration of M&E and building services into the external envelope;
- (k) Details of external ducts, vents, louvres and extracts;
- (l) Details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- (m) Details of access to the roof for cleaning and maintenance, including details of mansafe equipment; and
- (n) Details of any soffits, privacy screens, handrails and balustrades.

REASON: To ensure 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: DM12.3.

### **Design Details – Internal**

- 14 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) Details of the reinstatement of the skylight above the staircase within the entrance wing;
- (b) Details of the flooring finishes within the ground floor spaces;

- (c) Details of the revealing of brick vaulted ceilings and final treatments and finishes;
- (d) Details of the revealing of iron columns and final treatments and finishes;
- (e) Detailed internal elevations, floorplans and ceiling plans of agreed historic spaces at an agreed scale including details of historic features and removed fabric; and
- (f) Detail of the final amount of fabric removal associated with the enlarged service risers.

REASON: To ensure that the Local Planning Authority may be satisfied that the special architectural and historic interest of the listed building is conserved and enhanced in accordance with the following policies of the Local Plan: DM 12.3.

### **Building Services within Historic Spaces**

- 15 Prior to the commencement of the relevant works, full details of the restoration and incorporation of building services into the retained historic cellular spaces shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the Local Planning Authority may be satisfied that the special architectural and historic interest of the listed building is conserved and enhanced in accordance with the following policies of the Local Plan: DM 12.3.

### **Fire Strategy within Historic Spaces**

- 16 Before any works thereby affected are begun a Fire Strategy, with consideration to the protection of historic features and fabric, 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.

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.

### **Completion of Listed Building Repairs & Works**

- 17 No occupation or operation of the new extension shall take place until a full schedule of complete repairs including photographs and details to the listed building has been submitted too and approved in writing by the Local Planning Authority. These repairs should include those listed in the application, in addition to any other repairs required during the works.

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.

### **Heritage Interpretation**

- 18 No occupation or operation of the new extension shall take place until details of a piece of heritage interpretation for within the hotel lobby to include details of the history of the Whitbread Brewery shall be submitted to and approved in writing by the Local Planning Authority. The heritage interpretation shall be carried out as approved and so maintained in perpetuity.

REASON: In the interest of maintaining the historic interest of the site in accordance with the following policy of the Local Plan: CS12 and DM12.3.

### **Approved Plans and Particulars**

- 19 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:

#### **Indicative Planting:**

11602-EPR-01-EL-DR-A-TP0432 rev P02 - INDICATIVE EAST WING ELEVATIONS PLANTING

11602-EPR-00-RF-DR-A-TP0308 rev P02 - INDICATIVE ROOF PLAN PLANTING

11602-EPR-00-ZZ-DR-A-TP0431 rev P02 - INDICATIVE COURTYARD NORTH ELEVATION PLANTING

11602-EPR-00-03-DR-A-TP0307 rev P01 - INDICATIVE THIRD FLOOR PLAN PLANTING

#### **Sections:**

11602-EPR-00-ZZ-DR-A-TP0503 rev P02 - Existing, Demolition and Proposed Section D-D - Through Carriageway

11602-EPR-00-ZZ-DR-A-TP0502 rev P02 - Existing, Demolition and Proposed Section C-C - Through Lightwell

11602-EPR-00-ZZ-DR-A-TP0501 rev P02 - Existing, Demolition and Proposed Section B-B - Through New Entrance

11602-EPR-00-ZZ-DR-A-TP0500 rev P02 - Existing, Demolition and Proposed Section A-A - Through East Wing

11602-EPR-00-ZZ-DR-A-TP-0504 rev P01- Existing, Demolition and Proposed Section E-E – Through Southwest Wing

#### **Elevations:**

11602-EPR-00-ZZ-DR-A-TP0422 rev P02 - PROPOSED EAST WING ELEVATIONS

11602-EPR-00-ZZ-DR-A-TP0420 rev P02 - PROPOSED CHISWELL ST ELEVATION

Proposed Courtyard North Elevation 11602-EPR-00-ZZ-DR-A-TP0421 rev P02

11602-EPR-00-EL-DR-A-TP0423 – rev P01 - PROPOSED WEST WING ELEVATIONS

11602-EPR-00-EL-DR-A-TP0424 – rev P01 - PROPOSED WEST WING ELEVATIONS

Demolitions:

Demolition Chiswell St. Elevation 11602-EPR-00-EL-DR-A-TP410 rev P02

Demolition Courtyard North Elevation 11602-EPR-00-EL-DR-A-TP411 rev P02

Demolition East Wing Elevations 11602-EPR-00-EL-DR-A-TP412 rev P02

Demolition West Wing Elevations 11602-EPR-00-EL-DR-A-TP413 rev P02

Floorplans:

11602-EPR-00-B1-DR-A-TP0299 rev P01 – PROPOSED BASEMENT FLOOR PLAN OVERVIEW

11602-EPR-00-RF-DR-A-TP0336 rev P02 - WING B PROPOSED ROOF FLOOR PLAN

11602-EPR-00-RF-DR-A-TP0326 rev P02 - WING A PROPOSED ROOF FLOOR PLAN

11602-EPR-00-RF-DR-A-TP0306 rev P02 - PROPOSED ROOF FLOOR OVERVIEW

11602-EPR-00-05-DR-A-TP0305 rev P02 - PROPOSED FIFTH FLOOR PLAN OVERVIEW

11602-EPR-00-04-DR-A-TP0324 rev P03 - WING A PROPOSED FOURTH FLOOR PLAN

11602-EPR-00-04-DR-A-TP0304 rev P03 - PROPOSED FOURTH FLOOR PLAN OVERVIEW

11602-EPR-00-03-DR-A-TP0323 rev P03 - WING A PROPOSED THIRD FLOOR PLAN

11602-EPR-00-03-DR-A-TP0303 rev P03 - PROPOSED THIRD FLOOR PLAN OVERVIEW

11602-EPR-00-02-DR-A-TP0302 rev P01 - PROPOSED SECOND FLOOR PLAN OVERVIEW

11602-EPR-00-01-DR-A-TP0301 rev P02 - PROPOSED FIRST FLOOR PLAN OVERVIEW

11602-EPR-00-MZ-DR-A-TP0300M rev P01 - PROPOSED MEZZANINE FLOOR PLAN OVERVIEW

11602-EPR-00-GF-DR-A-TP0300 rev P02 - PROPOSED GROUND FLOOR PLAN OVERVIEW

11602-EPR-00-GF-DR-A-TP0320 rev P01 - WING A PROPOSED GROUND FLOOR PLAN

11602-EPR-00-GF-DR-A-TP0330 rev P01 - WING B PROPOSED GROUND FLOOR PLAN

11602-EPR-00-01-DR-A-TP0331 rev P01 - WING B PROPOSED FIRST FLOOR PLAN



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 You are requested to notify the Chief Planning Officer on commencement of the development in order that the works can be inspected and monitored.
- 3 This consent is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.

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interest of both the Brewery Conservation Area and Chiswell Street Conservation Area as the consistent scale, form and palette of materials are evident. The proposed roof extensions would be contrary to each of these characteristics causing harm to the Brewery Conservation Area and setting of the Chiswell Street Conservation Area.

The views provided within the TVHIA show the impact of the proposed roof extensions on the listed buildings and their setting. This is particularly clear within views 2, 5 and 6 where the setting of the terrace is harmed, and the form of the buildings obscured. View 4 shows the impact the proposed development would have on views from the north of the site which would have historically been part of the Whitbread Brewery. Here the roof extensions appear as a dominant element, drawing the eye away from the existing built form. This similarly applies to kinetic views down Chiswell Street detracting from the ability to appreciate the distinctive character within this small enclave in the City of London.

## **Policy and Guidance**

Section 16(2) of the Planning (Listed Building and Conservation Areas) Act 1990 makes it a statutory duty for the local authority or Secretary of State, 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. Regarding planning permission, section 66(1) of the Act makes it statutory duty for decision makers to have special regard to the desirability of preserving listed buildings or their setting. Section 72 of the Act states that special attention must be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Guidance on carrying out this statutory duty is set out by the Government within the National Planning Policy Framework (NPPF). Paragraph 205 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’. Any harm caused to the significance of a designated heritage asset will need a clear and convincing justification for doing so in line with paragraph 206 of the NPPF.

Planning practice guidance set out by the government requires any harm identified to either be classified as less than substantial or substantial harm. If the harm is identified as less than substantial, then in line with paragraph 208 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 CS13 states the City's objective 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'.

The following advice from paragraph 013 of the Planning Practice Guidance accompanying the NPPF entitled 'What is the setting of a heritage asset and how can it be taken into account?' is directly relevant: 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. Additionally, Historic England's guidance on the setting of heritage assets states: 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset'.

Paragraph 013 of the Planning Practice Guidance additionally states: 'The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'.

### **Recommendation**

As the application stands there would be less than substantial harm caused to the significance of 53, 54 and 55 Chiswell Street as a group of grade II listed buildings and 56 Chiswell Street. The character and interest of the Brewery Conservation Area and the Chiswell Street Conservation Area are heavily intertwined. The roof extensions would be visible in both kinetic and static views where the scale, materiality and form would obscure and detract from the character and appearance of the Brewery Conservation Area, and the setting of the Chiswell Street Conservation Area. This harm would be less than substantial.

The Georgian Group recommends the applications for Planning Permission and Listed Building Consent be refused by your local authority.

In determining this application, you should bear in mind the statutory duties contained within sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Yours sincerely,

Eddie Waller IHBC  
Conservation Adviser for London and South East England

**From:** [Gill Pedler](#)  
**To:** [PLN - Comments](#)  
**Subject:** The Whitbread Brewery, 49-56 Chiswell Street and South Yard buildings, London EC1Y 4SA 24/00863/FULL  
**Date:** 02 October 2024 17:26:54

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THIS IS AN EXTERNAL EMAIL

F.A.O Emma Barral

Our ref 198362

Your ref [24/00863/FULL](#)

**The Whitbread Brewery, 49-56 Chiswell Street and South Yard buildings, London EC1Y 4SA**

**Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.**

Dear Emma

Thank you for notifying the SPAB of the above application for alterations to this important group of listed buildings. Having reviewed the application documents, we would like to register our objection.

The SPAB generally only comments where a building has pre-1720s origins, and it would appear from the information submitted that of the collection of listed buildings within the development site, the central five bays of Partners House is within our remit. We defer comment on proposals for the later structures to colleagues at other amenity societies.

Partner's House is a grade II\* listed building of particular architectural and historic interest. It is the only building on the site to predate the Whitbread Brewery and is believed to have been built c.1700. The two bays to the east were added in 1750 and the bays to the west, in the 19<sup>th</sup> or early 20<sup>th</sup> century. Although the majority of the building was rebuilt in 1876, some original fabric remains, including the stair which rises the full height of the building.

We understand that the proposed roof extensions are to be situated above the eastern range of the listed buildings adjacent to Partner's House. While these extensions are not visible from street level, they are highly prominent within the streetscape and from the Barbican Podium. We consider that the dominant form of the proposed upper levels would detract from the significance of Partner's House, thereby diminishing its importance within the streetscape and causing an unjustifiable level of harm.

Additionally, we note that the internal alterations to Partner's House include the removal of several doors/doorcases from the ground, first and second floors of the earliest part of the building. The significance of the fabric to be lost has not been described, however, should these interventions result in the loss of historic fabric, we would object to their removal.

We therefore recommend that permission is refused.

We hope these comments are helpful to you.

Best wishes

Gill



**Gill Pedler**  
Casework Officer



Part-time hours: Monday to Wednesday

Please send all notifications of listed building consent applications, faculty applications or requests for pre-application advice to [casework@jcnas.org.uk](mailto:casework@jcnas.org.uk)

The Society for the Protection of Ancient Buildings (SPAB)  
37 Spital Square, London E1 6DY | 020 7377 1644 | [spab.org.uk](http://spab.org.uk)  
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# City of London Conservation Area Advisory Committee

Department of the Built Environment,  
Corporation of London,  
P.O. Box 270,  
Guildhall,  
London EC2P 2EJ

11<sup>th</sup> October 2024

Dear Sir/Madam,

At its meeting on 19<sup>th</sup> September 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

**C.114 24/00863/FULL – Hotel The Whitbread Brewery, 52 Chiswell Street, London EC1Y 4SA  
Brewery Conservation Area/Coleman Street Ward. Ward Club rep. Michael Khan.**

Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and associated works.

The Committee objected strongly to the proposal considering that the bulk, scale and mass of the addition to be over large in comparison with listed building. Members also considered that the design was out of keeping and that it was inappropriate and harmful to the character and appearance of the Conservation Area.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox  
Secretary



Mr Thomas Roberts  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: [REDACTED]

Our ref: P01583264

16 October 2024

Dear Mr Roberts

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HOTEL THE WHITBREAD BREWERY 52 CHISWELL STREET LONDON EC1Y 4SA  
Application No. 24/00863/FULL**

Thank you for your letter of 1 October 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

The site forms part of the former Whitbread Brewery, a large industrial complex that stood here for over 200 years. The listed buildings on Chiswell Street are survivors of its early Georgian establishment and Victorian redevelopment. When the brewery closed in the 1970s, the site was cleared, and the listed buildings extended to the rear at roof level. This development is visible from the street and has some harmful impacts.

Whilst many aspects of proposals to alter and extend the listed buildings on this site do not raise issues for Historic England, the height, scale and bulk of the proposed roof extensions would, in my view, cause harm to designated heritage assets through development in their setting.

Given our serious concerns about these proposals, I strongly recommend that the design approach is modified to reduce the impact of any new development on the heritage assets identified. To enable you to do so, the necessary LBC authorisation has not been issued at this time.

**Historic England Advice**



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*



## Significance

### *Origins of the Whitbread Brewery*

Samuel Whitbread bought the King's Head Brewhouse and associated courtyard on the south side of Chiswell Street in 1748. The site was cleared and by 1750 the new brewery began the mass production of porter. The operation expanded rapidly with new storehouses and engines as well as a counting house, tap room and other ancillary uses built to support the wider operation. By the time of Samuel Whitbread's death in 1786, the Chiswell Street brewery was producing more than 200,000 barrels a year. Its success spurred its expansion to both sides of Chiswell Street and by the early twentieth century, it had reached its greatest extent with production exceeding 330,000 barrels annually. The buildings were remodelled over time to encompass new technologies and to respond to the social changes in drinking establishments.

### *The buildings*

This area suffered severe bomb damage during WWII, although the Brewery site survived largely intact. Post-war planning to rebuild here brought significant changes including the development of the Golden Lane and Barbican Estates to encourage residential and other uses within the City, inspired by the work of Le Corbusier at Unite in Marseille.

Brewing ceased here in 1976 and most of the industrial buildings cleared for new offices and homes. The buildings on Chiswell Street had already been listed in 1950 and were retained by the Whitbread Company for its corporate activities. These include:

Partners House (II\*): the only pre-brewery building to survive, it dates to c.1700 notable for its window frames set flush with the brickwork and its protruding timber cornice. The rear element of its M-roof form was replaced in the 1970s with a flat roof extension

Entrance Wing (II): a segmental-arched carriageway entrance to the complex built as part of the 1890s redevelopment of the brewery although the buildings flanking this are earlier. It was extended east in the late nineteenth century and now has a modern mansard.

The Jugged Hare PH (No 49 and formerly The King's Head) (II): late nineteenth century pub built to replace an earlier pub associated with the brewery. It stands on the junction of Silk Street and Chiswell Street, defining the corner with a gently curving façade.

Chiswell Street (Former St Paul's Tavern) (II): the eighteenth-century pub was re-fronted in the mid-late nineteenth century with moulded stucco to the window



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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architraves, a projecting cornice supported on consoles and sculpted projecting parapet.

Also listed Grade II are 53, 54 and 55 Chiswell Street, the bridge over the brewery yard, sugar room, former Porter Tun room, the brewery building on Silk Street and brewery building on Milton Street.

The surviving buildings were largely associated with the administrative and hospitality aspects of the industrial complex, such as offices and tap rooms. They represent differing periods of the brewery's 200-year presence on this site but are of a similar height, scale and mass which is reinforced by the coherence of their elevational rhythm and material palette. The close-grained townscape and modest scale of the buildings contributes to their local distinctiveness. The homogeneity in their character and appearance is particularly notable given the larger office buildings that surround them.

The modern roof extensions to the rear of the listed buildings were added in the late 1970s. They are visible from the street, particularly from Lamb's Passage, but their scale, form and materiality help to reduce their impact. Nevertheless, they do cause a degree of harm to the designated heritage assets.

#### *Brewery and Chiswell Street Conservation Areas*

The listed buildings described above fall within Brewery Conservation Area. It was designated following the 1994 local authority boundary amendment which transferred these buildings from LB Islington to the City. Chiswell Street Conservation Area, which was designated in 1985, remains within LB Islington, contains the other surviving Whitbread buildings to the north. Of a similar scale and character, together they form a highly distinctive enclave.

Beyond the conservation area boundary, the wider area is very mixed in appearance with largely high-density townscape in its immediate vicinity. While the Brewery Street Conservation Area contains a tight grain of mainly listed buildings set around a courtyard, its immediate setting is dominated by large-scale modern office developments.

The Barbican Estate, icon of the Brutalist Movement in Britain, forms part of this wider setting. Its high-level pedestrian walkway, known as the Podium, offers views of the conservation areas and particularly those buildings on the south side of Chiswell Street. The estate is listed Grade II and a main component of the Barbican and Golden Lane Estate Conservation Area.

### **The proposals and their impact**



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### *Proposals*

The proposals seek to alter and extend the existing hotel to create 19 additional bedrooms. There would also be internal alterations to improve access, fire egress and mechanical and electrical infrastructure. The most notable impact is the replacement of the 1970s roof extensions with new larger, more extensive development that would be clearly visible in street views.

The proposed new roof will be between 1 to 2 storeys higher than the existing 1970s roof extensions and sit forward of the current extension line, closer to the Chiswell Street façade. Whilst some of the new floorspace is for additional plant equipment, much of the additional volume is dedicated to the new hotel rooms.

### *Impacts*

Although set back from the street frontage, the overall height and scale of the proposed extensions is substantially greater than the existing. The elongated saw-tooth roof form means that the new rooms have greater floor to ceiling heights than the existing. Whilst the design intent is to reflect the lost industrial character, it is visually conspicuous and creates an uncomfortable contrast with the polite architecture of the listed buildings below, their orthogonal character and proportions of scale based on classical principles.

The bulk and mass of the proposals are further emphasised by their materiality. The lower element would be fully glazed and highly conspicuous when lit at night. The dark grey and black mesh façade treatment to the upper roof element appears oppressive due to its colour, compounded by that it is relatively solid form.

The proposed roof extensions would, therefore, starkly contrast with the coherent low-rise scale of the 18th and 19th century buildings below. The bold architectural form of the proposed extension would make it a particularly overbearing presence in the context of the group of listed buildings and their homogeneous composition.

The other internal works will have some impacts on the listed buildings but do not raise substantive matters for Historic England.

### **Relevant policy and guidance**

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the obligation on local planning authorities to pay special regard to preserving the special interest of listed buildings and their settings, and special attention to preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies



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for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development. Relevant policies include: 201, 205, 206, 208, 209 and 212.

The London Plan 2021 provides the spatial development strategy for Greater London. Policy HC1 of the London Plan relates to heritage conservation and growth. Part C states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.

Other relevant policy and guidance documents include:

- The London Plan (2021)
- The City of London Local Plan (2015)
- The Brewery Conservation Area Character Study (City of London, 2000)
- Chiswell Street Conservation Area Design Guidelines (LB Islington, 2002)
- The Setting of Heritage Assets (GPA 3, Historic England, 2015)

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. The proposals would cause harm to a range of designated heritage assets including several listed buildings, the Brewery and Chiswell Street Conservation Areas through development within its immediate setting.

The harm relates to the scale and bulk of the extension scheme which we consider would have an overbearing presence in views from the east along Chiswell Street towards Whitecross Street and from the north along Lamb's Passage. It will also be visible from the Barbican Podium at Ben Johnson House where its height, scale and bulk will be clearly apparent in relation to the range of listed buildings.

We consider that the harm would be greatest to the component designations of the former Whitbread Brewery that are listed Grade II and in respect of Partners House, Grade II\*. These buildings are also the heart of the Brewery Conservation Area and read in conjunction with the Chiswell Street Conservation Area to the north.

It is the harm to local street views of Partners House that would attract the most weight due to its exceptional significance as a Grade II\* listed building (NPPF, Para 205). However, it should be recognised that this is seen in the context of a wider group of



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Grade II listed buildings associated with the brewery and that this has collective significance. I therefore strongly recommend that the height of the proposed development is reduced so it would appear subservient to the listed buildings below.

The NPPF also states that, if harm is unavoidable, opportunities should be sought to minimise the harm (NPPF, Paras 201 and 212). While a reduction in the height of the proposals would lower the harm to listed buildings and the Brewery Conservation Area, opportunities to reduce its overall bulk and mass, potentially with more muted façade treatments, should be explored to help reduce its impact.

Given the extent of our concerns and to enable you to address these with the applicant, the necessary LBC authorisation has not been issued at this time.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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Mr Thomas Roberts  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Our ref: P01583264

19 December 2024

Dear Mr Roberts

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HOTEL THE WHITBREAD BREWERY 52 CHISWELL STREET LONDON EC1Y 4SA  
Application No. 24/00863/FULL**

Thank you for your letter of 29 November 2024 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Historic England provided advice on the original application on 16 October 2024 in which I outlined our serious concerns about these proposals on heritage grounds.

Whilst amendments have subsequently been made to the scheme, the impact of the height, scale and bulk of the proposed roof extensions remain broadly similar. Our advice therefore remains unchanged, and I remain of the view that the development would cause harm to a range of designated heritage assets including several listed buildings, the Brewery and Chiswell Street Conservation Areas through development within its immediate setting.

As set out in our earlier letter, the harm relates to the scale and bulk of the extension scheme which we consider would have an overbearing presence in views from the east along Chiswell Street towards Whitecross Street and from the north along Lamb's Passage. It will also be visible from the Barbican Podium at Ben Johnson House where its height, scale and bulk will be clearly apparent in relation to the range of listed buildings.

We consider that the harm would be greatest to the component designations of the former Whitbread Brewery that are listed Grade II and in respect of Partners House, Grade II\*. These buildings are also the heart of the Brewery Conservation Area and read in conjunction with the Chiswell Street Conservation Area to the north.



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It is the harm to local street views of Partners House that would attract the most weight due to its exceptional significance as a Grade II\* listed building (NPPF, Para 205). However, it should be recognised that this is seen in the context of a wider group of Grade II listed buildings associated with the brewery and that this has collective significance.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice letter of 16 October 2024 need to be addressed in order for the application to meet the requirements of the National Planning Policy Framework. In its current form, we object to these proposals.

Should your authority be minded to grant consent, careful consideration should be given to the conditions associated with it to secure the design outcomes aspired to by these proposals. Careful consideration should be given in particular to materials, junction details and securing repairs to historic fabric that are set out as public benefits prior to occupancy.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas



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**From:** [Ross Anthony](#)  
**To:** [PLN - Comments](#)  
**Subject:** Application Ref: 24/00863/FULL - The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA  
**Date:** 20 December 2024 12:41:19

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THIS IS AN EXTERNAL EMAIL

FAO: Hibaaq Gelleh

**Address:** Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA  
**Application Ref:** 24/00863/FULL

**Proposal:** Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works. Re-consultation due to updated drawings.

**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 amended and additional documentation submitted for the above application.

HB&P objected to the initial plans submitted for this application due to the impact the proposed roof top addition would have on the relevant listed buildings and the character of the Brewery Conservation Area. The minor changes to the setbacks and design shown in the amended plans do not alleviate those concerns and therefore HB&P maintains our objection.

As previously stated, HB&P accept the principle of an appropriately scaled and designed upward extension. However, that extension must respect the architecture and historic qualities of the listed buildings and the conservation area and should not be so overtly dominant and out of character with the host heritage assets involved.

**Policy:** The City of London Local Plan 2015; Policy DM 12.2 Development in conservation areas states that: 'Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area'.

Policy DM 12.2 states that: 'In the design of new buildings or alteration of existing buildings, developers should have regard to the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale'.

This is reflected in draft policy HE1 in the draft Local Plan 2040.

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.

**Recommendation:** Refusal for being contrary to the City of London Local Plan, the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990.

Regards

Ross Anthony

**Case Work**



[www.hbap.org.uk](http://www.hbap.org.uk)



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.

**From:** [REDACTED]  
**To:** [PLN - Comments](#)  
**Subject:** Application: 24/00863/FULL & 24/00864/LBC  
**Date:** 23 December 2024 11:32:18

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THIS IS AN EXTERNAL EMAIL

Dear Ms Gelleh,

Thank you for consulting the Georgian Group on the amended plans for the Whitebread Brewery site. We acknowledge the amendments made to the proposed applications for Planning Permission and Listed Buildings, however they do not address our previous concerns.

The Group maintains its objection to the applications for Planning Permission and Listed Building Consent.

Kind regards,

Eddie Waller IHBC  
Conservation Adviser  
London and South East England



[Support the Georgian Group. become a member | georgiangroup.org.uk](#)

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**From:** [Gill Pedler](#)  
**To:** [PLN - Comments](#)  
**Subject:** The Whitbread Brewery, 49-56 Chiswell Street and South Yard buildings, London EC1Y 4SA 24/00863/FULL  
**Date:** 06 January 2025 11:58:08

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THIS IS AN EXTERNAL EMAIL

F.A.O Hibaaq Gelleh

Our ref 201227

Your ref [24/00863/FULL](#)

**The Whitbread Brewery, 49-56 Chiswell Street and South Yard buildings, London EC1Y 4SA**

**Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.**

**Re-consultation due to updated drawings.**

Dear Hibaaq

Thank you for notifying the SPAB of the additional information provide in support of the above application for alterations to this important group of listed buildings. Having reviewed the application documents, we would like to register our objection.

We refer to our previous response of 2<sup>nd</sup> October and note that the additional information does not address the points raised.

We therefore object to this application and recommend that it is refused.

We hope these comments are helpful to you.

Best wishes

Gill

**Gill Pedler**  
Casework Officer

Phone number: [REDACTED]  
Part-time hours: Monday to Wednesday

Please send all notifications of listed building consent applications, faculty applications or requests for pre-application advice to [casework@jcnas.org.uk](mailto:casework@jcnas.org.uk)

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# Comments for Planning Application 24/00863/FULL

## Application Summary

Application Number: 24/00863/FULL

Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

Proposal: Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.

Case Officer: Emma Barral

## Customer Details

Name: David Coleman

Address: [REDACTED] London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I welcome the proposals for the ground floor, including the opening of a new entrance on Chiswell Street.

I object to the roof extensions.

The stated intention of the proposals is

"Celebrating the unique history and architectural moments of the site through a sensitive approach to preserve the building's heritage and enhance its charm."

In the Townscape, heritage and visual impact assessment, the impact on the streetscape is judged as:

"The introduction of a contrasting modern form within the context of the existing, mixed, streetscape is wholly appropriate and the listed buildings would continue to be read and understood in much the same way as they are now .... There would be a change of Moderate magnitude to townscape with a High sensitivity to change. The quality of effect would be Beneficial."

I disagree. The "contrasting modern form" of the saw tooth black boxes is ugly, alien and draws the eye away from the pleasing forms of the historic streetscape. This design should be rejected as inappropriate and the developers asked to rethink.

I have a concern about the noise levels of the new plant being proposed. Night-time noise levels at Cromwell Tower (39 bedrooms in direct line of sight) are predicted to be exactly at the level required by City regulations - ie. no margin at all for uncertainty in the calculations or the impact of weather conditions. A planning condition should be attached which requires the developers to undertake fuller before and after monitoring to ensure that there are no increased noise impacts on Cromwell Tower.

# Comments for Planning Application 24/00863/FULL

## Application Summary

Application Number: 24/00863/FULL

Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

Proposal: Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.

Case Officer: Emma Barral

## Customer Details

Name: Miss Amber Patrick

Address: Association for Industrial Archaeology Ironbridge Gorge Museum, Coalbookdale Telford

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The Association for Industrial Archaeology notes that this application relates to the Hotel in the former Whitbread Brewery. It includes some demolitions, alterations and extensions particularly an upward one to provide additional floorspace. There will be altered and additional entrances, some facade and internal alterations and associated works. The Whitbread Brewery site has already been subject to substantial alteration over the years, when it was a working brewery and subsequently with its partial reuse as a hotel. It is inevitable that there should be a need for further alterations to enable the Hotel to remain a successful business. The majority of the proposed alterations should not present any problems, such as the internal ones and even exterior ones such as entrances. However, there is one main change and that is the roof extension. The proposal is to replace the present one which is already a non-original extension. It is appreciated that the intention is that it will be clearly not an original part of the Brewery and that it may not be particularly visible, but it does not fit in with the surroundings. Alterations to buildings even when in their original use might be designed to fit in with the original design features or they may be designed simply to be functional for the business with no consideration given to the aesthetics of the building/site. Providing additions at this stage in a building's history provides an opportunity to ensure that they may be identifiable as a subsequent addition but also that they fit the identity of both the building's original use and history, as well as its location and therefore their visibility and effect on the surrounding area. Therefore although the Association only objects to the replacement upward extension. It should be designed to be both distinctive as a later addition but also fit in with the building and its surroundings.

# Comments for Planning Application 24/00863/FULL

## Application Summary

Application Number: 24/00863/FULL

Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

Proposal: Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.

Case Officer: Emma Barral

## Customer Details

Name: Dr Alison Edwards

Address: COUNCIL FOR BRITISH ARCHAEOLOGY De Grey House, St Leonard's Place YORK

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Thank you for notifying the Council for British Archaeology (CBA) of this application.

The Whitbread Brewery is an interesting multi-phase site with high evidential and historical value. It makes a positive contribution to our understanding of the economic and architectural development of the area and is a landmark in the City of London's Brewery Conservation Area.

The CBA do not wish to make detailed comments on the proposed internal alterations at this point. However, we object to the scale and design of the proposed upward extension to the Entrance Wing and nos. 53-56 Chiswell Street. Although the existing roof extension is modern and does not contribute to the building's historic significance, it is set back, unobtrusive and of sympathetic materials. The proposed roof extensions would be highly visible above the listed buildings and the black cladding would be entirely out of character for the surroundings. It would significantly change the aesthetic and architectural character of the listed buildings, and would cause harm to the wider Brewery Conservation area.

We do not consider that the proposed designs meet the requirements of paras. 205 & 206 of the NPPF, section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act, or Policy HE1 of the Draft City Plan. We recommend that the application is withdrawn and the plans revised.

Please keep the CBA informed of any developments with this case.

Kind Regards,

Dr Alison Edwards

Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, 'Arrangements for handling heritage applications - notification To Historic England and National Amenity Societies and the Secretary of state (England)' direction 2021.



# Comments for Planning Application 24/00863/FULL

## Application Summary

Application Number: 24/00863/FULL

Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

Proposal: Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.

Case Officer: Emma Barral

## Customer Details

Name: Dr Tamsin McMillan

Address: Gardens Trust 70 Cowcross Street London

## Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Other

Comment: Thank you for consulting the Gardens Trust on this application.

We have considered the information that you have provided and on the basis of this do not wish to comment on the proposals at this stage.

We would however emphasise that this does not in any way signify either our approval or disapproval of the proposals.

If you have any further queries, please contact us at [consult@thegardenstrust.org](mailto:consult@thegardenstrust.org), and we would be grateful to be advised of the outcome of the application in due course.



**Ref: 24/00864/LBC The Whitbread Brewery 52 Chiswell Street, EC1Y 4SA**

*Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.*

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage.

We object to this planning application as it would totally alter the character of the building with the associated loss of significance of the listed buildings at 53, 54, 55 and 56 Chiswell Street.

The Whitbread Brewery on Chiswell Street was founded by Samuel Whitbread in 1750, as the country's first purpose-built mass-production brewery and was in operation for over 200 years before closing down in 1976. The site is now known as 'The Brewery', and has been converted into a corporate, party and weddings venue. The site encompasses eight Grade II and Grade II\* listed buildings and is fully situated within the Brewery conservation area.

The site holds high historical significance in that it represents an almost intact example of the Whitbread Brewery site as it would have stood before the middle of the 20th century.

The development includes for 'a contemporary roof extension containing additional hotel bedrooms to the Entrance Wing, 53, 54, 55 and 56 Chiswell Street.' This extension will be clad in cross-hatch mesh and linear and horizontal corrugated black metal.

Whilst it is recognised that the rooftop extension is intended to replace a modern extension, it is our opinion that the dominance of the black metal structure as seen from Chiswell Street, as shown in pages 5 and 82 of the applicants design and access statement, will create a significant negative contribution to the heritage significance of the listed buildings and their setting.

We refute the statement made in para 5.10 of the Townscape, Heritage and Visual Impact Assessment: *The design and language of the new extension takes its inspiration from the industrial history of the site, in particular from the angular aesthetic of the saw-toothed roof form traditionally found on the brewery buildings, as well as in its use of metal providing further industrial texture. The proposed use of profiled black sheet-metal cladding clearly introduces new materiality to the current roofscape, but with some historical precedent and justification: this part of the brewery was formerly raised and roofed in arched corrugated iron.*

Throughout its history, the brewery roofline has always consisted of mansard roofs, and at no point is there any indication of any industrial saw-tooth roofs.

Paragraph 200 of the NPPF requires 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.*

Paragraph 202 of the NPPF requires 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.*

The City of London Local Plan 2015; Policy DM 12.2 Development in conservation areas requires that: *Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.*

The Committee are of the opinion that the proposed industrial metal saw-toothed roof extension will lead to loss of significance of the listed buildings, which whilst it is recognised that such loss may be considered as less than substantial harm, such loss outweighs the negligible public benefits that would be provided.

**The Committee therefore strongly recommends that this planning application be refused.**

Vicki Fox (Hon. Secretary)  
**LAMAS – Historic Buildings & Conservation Committee**

**30 September 2024**

# Comments for Planning Application 24/00863/FULL

## Application Summary

Application Number: 24/00863/FULL

Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

Proposal: Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.  
Re-consultation due to updated drawings.

Case Officer: Hibaaq Gelleh

## Customer Details

Name: Dr Alison Edwards

Address: COUNCIL FOR BRITISH ARCHAEOLOGY De Grey House, St Leonard's Place YORK

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Thank you for notifying the Council for British Archaeology (CBA) of these revised proposals.

We note that sections of the proposed upward extensions have been stepped back from the roofline, which slightly improves the impact on the streetscape. The colour has also been slightly amended.

However, we still consider that the design and massing of the proposed rooftop additions are unsuitable for this historic brewery complex, and would cause harm to the building's historic significance and to the Brewery conservation area.

The angular, minimally fenestrated design of the new structures fails to respond to the regular, polite frontages of the listed buildings on Chiswell Street, creating a jarring visual effect. The scale and massing of the proposed new structures, despite the reductions proposed by this amendment, remains overly dominant in the street scene.

The CBA maintain our previous objection to this application. We do not consider that it meets the requirements of paras. 212 and 213 of the NPPF (as revised Dec. 2024), section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act, or Policy HE1 of the Draft City Plan. Unless considerable alterations are made to the scale and design of the proposed upward extensions to this historic complex, we recommend that this application be refused.

I trust these comments are useful to you. Please keep the CBA informed of any developments with this case.

Kind Regards,  
Dr Alison Edwards  
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, 'Arrangements for handling heritage applications - notification To Historic England and National Amenity Societies and the Secretary of state (England)' direction 2021.

# Comments for Planning Application 24/00863/FULL

## Application Summary

Application Number: 24/00863/FULL

Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

Proposal: Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.  
Re-consultation due to updated drawings.

Case Officer: Hibaaq Gelleh

## Customer Details

Name: Dr Tamsin McMillan

Address: Gardens Trust 70 Cowcross Street London

## Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Other

Comment: Thank you for consulting the Gardens Trust on this application.

We have considered the information that you have provided and on the basis of this do not wish to comment on the proposals at this stage.

We would however emphasise that this does not in any way signify either our approval or disapproval of the proposals.

If you have any further queries, please contact us at [consult@thegardenstrust.org](mailto:consult@thegardenstrust.org), and we would be grateful to be advised of the outcome of the application in due course.

# Comments for Planning Application 24/00863/FULL

## Application Summary

Application Number: 24/00863/FULL

Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

Proposal: Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.  
Re-consultation due to updated drawings.

Case Officer: Hibaaq Gelleh

## Customer Details

Name: Mr Andrew Vergottis

Address: [REDACTED] London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I strongly object to the roof extensions, due to noise levels. The night-time noise and proximity to Cromwell Tower and Ben Jonson House bedrooms would be a huge disruption. Given the track record of the Brewery with regard to noise complaints, I have no confidence in before/after monitoring in alleviating the issue.

No objection to the ground floor proposals/new entrance.



Gwyn Richards  
Director of Planning and Development  
City of London Corporation  
PO Box 270  
Guildhall  
EC2P 2EJ

15 January 2025

Dear Mr Richards,

**Re:** 24/00864/LBC | Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works. Re-consultation due to updated drawings. | Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

Further to my comments of 17 September last re the above application, today I became aware of revised drawings having been submitted by the applicant last November! I would like to know why I wasn't advised of the *re-consultation due to up to date drawings*. Please advise by return

My comments were addressed to the application for Listed Building Consent – but should be treated as comments on the related application for Planning Permission (24/00863/FULL) please. Having now had the opportunity of considering the up to date drawings my objection to both 24/00863/FULL – and 24/00864/LBC) remain. In particular:

1. The revised roof treatment appears to be even closer to the Hastings fishermen's huts, even if a *slightly lightened grey metal façade* is now proposed. The loss of three rooms is obviously unwelcome but, surely, a less intrusive roof treatment isn't beyond the scope of the architects, one that recovers the lost rooms even. Certainly, a more conventional design, one which didn't pretend to take its cue from never-existent industrial buildings, could be produced;
2. I suggested the addition of secondary-glazing for obvious environmental reasons. However, I note that the applicant's agent's covering letter of 25 November proposes a commitment to carry out *works to repair (and where necessary, sympathetically replace) windows*. Repairing and replacing may be necessary but the windows still won't be double-glazed so secondary-glazing will still be needed as per my original comments; and
3. The proposed public benefits, while welcome, should be extended to include specific benefits for nearby residents. These could include the provision of meeting rooms, reduced rate tariffs for bedrooms, discounts for meals etc.

As amended above, my original comments remain and extend to both 24/00863/FULL and 24/00864/LBC. I ask that consideration of the two applications should be deferred until an unintrusive roof treatment has been submitted. Please add these comments to the planning portal for both applications.

Best regards,

Fred Rodgers



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**From:** [Ross Anthony](#)  
**To:** [PLN - Comments](#)  
**Subject:** Application Ref: 24/00864/LBC - The Whitbread Brewery 52 Chiswell Street London EC1Y  
**Date:** 25 September 2024 15:45:15

You don't often get email from [REDACTED]. [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

**Address: The Whitbread Brewery 52 Chiswell Street London EC1Y**

**Application Ref: 24/00864/LBC**

**Proposal:** Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works.

**Statutory Remit:** Historic Buildings & Places (HB&P) 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 about the above application for listed building consent.

HB&P do not wish to make any comments on the internal alterations and defer to Council's Conservation Officer on these matters. HB&P do, however, wish to strongly object to the proposed roof top additions to the buildings facing Chiswell Street, which includes the grade II listed former Entrance Wing to Whitbread's Brewery and to No 50-56 Chiswell Street (including the grade II buildings which the list description identifies as being 53, 54 and 55 Chiswell Street).

The Brewery Conservation Area encompasses the remaining former Whitbread's Brewery buildings on the south side of Chiswell Street. It is a small and tightly defined conservation area characterised by a close-grained townscape, consisting of varied scale, 18th and 19th century buildings set around a paved internal courtyard. The two public houses at either end of the site and the arched entrance to the courtyard provide focus and definition for the conservation area. The buildings within the conservation area are mostly listed at Grade II\* or Grade II.

While HB&P recognise that the existing roof tops to 53-56 have been altered in the past, the proposed 'industrial' inspired upward addition is completely inappropriate for the host heritage assets, in terms of scale, design and materials. It is an intrusive addition and not at all sympathetic to the architectural form or nature of these Georgian and Victorian buildings.

We strongly disagree with the claim that 'The introduction of a contrasting modern form within the context of the existing, mixed, streetscape is wholly appropriate and the listed buildings would continue to be read and understood in much the same way as they are now...' The dominance of the additions is highly distracting and harms the surviving historic streetscape, the significance and architectural interest of the heritage assets, as well as the harming the character of the conservation area.

The application is therefore considered contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990 and the desirability of preserving the buildings and

conservation area, the setting and features of special architectural and historic interest which they possess.

**Policy:** Chapter 16 of the NPPF (2023), particularly paragraph 205, that 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.

**Recommendation:** Withdrawal or refusal on heritage grounds.

Regards

Ross Anthony

Case Work



HISTORIC  
BUILDINGS  
& PLACES

[www.hbap.org.uk](http://www.hbap.org.uk)



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.

27/09/24

**Application: Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and associated works.**

**LPA Reference: 24/00863/FULL & 24/00864/LBC**

**Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA**

Dear Ms Barral,

Thank you for consulting the Georgian Group on the above applications for Planning Permission and Listed Building Consent. Based on the available information, the Group forwards its objection to both applications for the reasons set out below.

### **Significance of Heritage Assets and Surrounding Area**

The application site contains several listed buildings associated with the site's former use as the Whitbread Brewery. Those assets are set out within the HTVIA, and their architectural, historic and archaeological interest are clearly described and will therefore not be expanded on here. As a collective, they possess a distinctive character which is of a consistent scale with a clear material palette and forms the Brewery Conservation Area.

Chiswell Street Conservation Area has a similarly distinctive character and is located north of the application site, which once comprised a whole, before the boundary changes in 1994 which divided the site into two conservation areas. Both are therefore complimentary to one another with views between them contributing to their interest and setting. This is best appreciated along Chiswell Street, within Sundial Court and down Lamb's Passage where the historic scale and operation of the former brewery site can be appreciated.

### **Proposals**

The applicant intends to expand the existing floorspace of the hotel by extending the buildings on the site upwards, including those listed buildings along Chiswell Street.

### **Proposals and their Impact**

The buildings associated with the historic Whitbread Brewery site located on the north and south of Chiswell Street create a distinctive and important group with considerable architectural and historic interest. Views within this enclave contribute to the

interest of both the Brewery Conservation Area and Chiswell Street Conservation Area as the consistent scale, form and palette of materials are evident. The proposed roof extensions would be contrary to each of these characteristics causing harm to the Brewery Conservation Area and setting of the Chiswell Street Conservation Area.

The views provided within the TVHIA show the impact of the proposed roof extensions on the listed buildings and their setting. This is particularly clear within views 2, 5 and 6 where the setting of the terrace is harmed, and the form of the buildings obscured. View 4 shows the impact the proposed development would have on views from the north of the site which would have historically been part of the Whitbread Brewery. Here the roof extensions appear as a dominant element, drawing the eye away from the existing built form. This similarly applies to kinetic views down Chiswell Street detracting from the ability to appreciate the distinctive character within this small enclave in the City of London.

## **Policy and Guidance**

Section 16(2) of the Planning (Listed Building and Conservation Areas) Act 1990 makes it a statutory duty for the local authority or Secretary of State, 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. Regarding planning permission, section 66(1) of the Act makes it statutory duty for decision makers to have special regard to the desirability of preserving listed buildings or their setting. Section 72 of the Act states that special attention must be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Guidance on carrying out this statutory duty is set out by the Government within the National Planning Policy Framework (NPPF). Paragraph 205 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’. Any harm caused to the significance of a designated heritage asset will need a clear and convincing justification for doing so in line with paragraph 206 of the NPPF.

Planning practice guidance set out by the government requires any harm identified to either be classified as less than substantial or substantial harm. If the harm is identified as less than substantial, then in line with paragraph 208 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 CS13 states the City's objective 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'.

The following advice from paragraph 013 of the Planning Practice Guidance accompanying the NPPF entitled 'What is the setting of a heritage asset and how can it be taken into account?' is directly relevant: 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. Additionally, Historic England's guidance on the setting of heritage assets states: 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset'.

Paragraph 013 of the Planning Practice Guidance additionally states: 'The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'.

### **Recommendation**

As the application stands there would be less than substantial harm caused to the significance of 53, 54 and 55 Chiswell Street as a group of grade II listed buildings and 56 Chiswell Street. The character and interest of the Brewery Conservation Area and the Chiswell Street Conservation Area are heavily intertwined. The roof extensions would be visible in both kinetic and static views where the scale, materiality and form would obscure and detract from the character and appearance of the Brewery Conservation Area, and the setting of the Chiswell Street Conservation Area. This harm would be less than substantial.

The Georgian Group recommends the applications for Planning Permission and Listed Building Consent be refused by your local authority.

In determining this application, you should bear in mind the statutory duties contained within sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Yours sincerely,

Eddie Waller IHBC  
Conservation Adviser for London and South East England



---

**From:** Daly, Breda [REDACTED]  
**Sent:** 16 October 2024 11:26  
**To:** Roberts, Thomas [REDACTED]  
**Cc:** Parker, Joanna [REDACTED]  
**Subject:** Chiswell Street: 24/00863/FULL

THIS IS AN EXTERNAL EMAIL

Good morning Tommy

Please find attached our response to the above planning consultation. Please take this as our response to the LBC too. I've not issued the authorisation for the LBC at this time to allow for any changes to the proposals.

Thanks  
Breda

Breda Daly BA (Hons), MA, IHBC  
Inspector of Historic Buildings and Areas  
London and South East Region

Historic England  
4th Floor, Cannon Bridge House  
25 Dowgate Hill | London | EC4R 2YA

Please note I work part-time. My working days are usually Monday, Wednesday and Thursday



Historic England

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at [historicengland.org.uk/strategy](https://historicengland.org.uk/strategy).

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Mr Thomas Roberts  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: [REDACTED]

Our ref: P01583264

16 October 2024

Dear Mr Roberts

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HOTEL THE WHITBREAD BREWERY 52 CHISWELL STREET LONDON EC1Y 4SA  
Application No. 24/00863/FULL**

Thank you for your letter of 1 October 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

The site forms part of the former Whitbread Brewery, a large industrial complex that stood here for over 200 years. The listed buildings on Chiswell Street are survivors of its early Georgian establishment and Victorian redevelopment. When the brewery closed in the 1970s, the site was cleared, and the listed buildings extended to the rear at roof level. This development is visible from the street and has some harmful impacts.

Whilst many aspects of proposals to alter and extend the listed buildings on this site do not raise issues for Historic England, the height, scale and bulk of the proposed roof extensions would, in my view, cause harm to designated heritage assets through development in their setting.

Given our serious concerns about these proposals, I strongly recommend that the design approach is modified to reduce the impact of any new development on the heritage assets identified. To enable you to do so, the necessary LBC authorisation has not been issued at this time.

**Historic England Advice**



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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## Significance

### *Origins of the Whitbread Brewery*

Samuel Whitbread bought the King's Head Brewhouse and associated courtyard on the south side of Chiswell Street in 1748. The site was cleared and by 1750 the new brewery began the mass production of porter. The operation expanded rapidly with new storehouses and engines as well as a counting house, tap room and other ancillary uses built to support the wider operation. By the time of Samuel Whitbread's death in 1786, the Chiswell Street brewery was producing more than 200,000 barrels a year. Its success spurred its expansion to both sides of Chiswell Street and by the early twentieth century, it had reached its greatest extent with production exceeding 330,000 barrels annually. The buildings were remodelled over time to encompass new technologies and to respond to the social changes in drinking establishments.

### *The buildings*

This area suffered severe bomb damage during WWII, although the Brewery site survived largely intact. Post-war planning to rebuild here brought significant changes including the development of the Golden Lane and Barbican Estates to encourage residential and other uses within the City, inspired by the work of Le Corbusier at Unite in Marseille.

Brewing ceased here in 1976 and most of the industrial buildings cleared for new offices and homes. The buildings on Chiswell Street had already been listed in 1950 and were retained by the Whitbread Company for its corporate activities. These include:

Partners House (II\*): the only pre-brewery building to survive, it dates to c.1700 notable for its window frames set flush with the brickwork and its protruding timber cornice. The rear element of its M-roof form was replaced in the 1970s with a flat roof extension

Entrance Wing (II): a segmental-arched carriageway entrance to the complex built as part of the 1890s redevelopment of the brewery although the buildings flanking this are earlier. It was extended east in the late nineteenth century and now has a modern mansard.

The Jugged Hare PH (No 49 and formerly The King's Head) (II): late nineteenth century pub built to replace an earlier pub associated with the brewery. It stands on the junction of Silk Street and Chiswell Street, defining the corner with a gently curving façade.

Chiswell Street (Former St Paul's Tavern) (II): the eighteenth-century pub was re-fronted in the mid-late nineteenth century with moulded stucco to the window



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architraves, a projecting cornice supported on consoles and sculpted projecting parapet.

Also listed Grade II are 53, 54 and 55 Chiswell Street, the bridge over the brewery yard, sugar room, former Porter Tun room, the brewery building on Silk Street and brewery building on Milton Street.

The surviving buildings were largely associated with the administrative and hospitality aspects of the industrial complex, such as offices and tap rooms. They represent differing periods of the brewery's 200-year presence on this site but are of a similar height, scale and mass which is reinforced by the coherence of their elevational rhythm and material palette. The close-grained townscape and modest scale of the buildings contributes to their local distinctiveness. The homogeneity in their character and appearance is particularly notable given the larger office buildings that surround them.

The modern roof extensions to the rear of the listed buildings were added in the late 1970s. They are visible from the street, particularly from Lamb's Passage, but their scale, form and materiality help to reduce their impact. Nevertheless, they do cause a degree of harm to the designated heritage assets.

#### *Brewery and Chiswell Street Conservation Areas*

The listed buildings described above fall within Brewery Conservation Area. It was designated following the 1994 local authority boundary amendment which transferred these buildings from LB Islington to the City. Chiswell Street Conservation Area, which was designated in 1985, remains within LB Islington, contains the other surviving Whitbread buildings to the north. Of a similar scale and character, together they form a highly distinctive enclave.

Beyond the conservation area boundary, the wider area is very mixed in appearance with largely high-density townscape in its immediate vicinity. While the Brewery Street Conservation Area contains a tight grain of mainly listed buildings set around a courtyard, its immediate setting is dominated by large-scale modern office developments.

The Barbican Estate, icon of the Brutalist Movement in Britain, forms part of this wider setting. Its high-level pedestrian walkway, known as the Podium, offers views of the conservation areas and particularly those buildings on the south side of Chiswell Street. The estate is listed Grade II and a main component of the Barbican and Golden Lane Estate Conservation Area.

### **The proposals and their impact**



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### *Proposals*

The proposals seek to alter and extend the existing hotel to create 19 additional bedrooms. There would also be internal alterations to improve access, fire egress and mechanical and electrical infrastructure. The most notable impact is the replacement of the 1970s roof extensions with new larger, more extensive development that would be clearly visible in street views.

The proposed new roof will be between 1 to 2 storeys higher than the existing 1970s roof extensions and sit forward of the current extension line, closer to the Chiswell Street façade. Whilst some of the new floorspace is for additional plant equipment, much of the additional volume is dedicated to the new hotel rooms.

### *Impacts*

Although set back from the street frontage, the overall height and scale of the proposed extensions is substantially greater than the existing. The elongated saw-tooth roof form means that the new rooms have greater floor to ceiling heights than the existing. Whilst the design intent is to reflect the lost industrial character, it is visually conspicuous and creates an uncomfortable contrast with the polite architecture of the listed buildings below, their orthogonal character and proportions of scale based on classical principles.

The bulk and mass of the proposals are further emphasised by their materiality. The lower element would be fully glazed and highly conspicuous when lit at night. The dark grey and black mesh façade treatment to the upper roof element appears oppressive due to its colour, compounded by that it is relatively solid form.

The proposed roof extensions would, therefore, starkly contrast with the coherent low-rise scale of the 18th and 19th century buildings below. The bold architectural form of the proposed extension would make it a particularly overbearing presence in the context of the group of listed buildings and their homogeneous composition.

The other internal works will have some impacts on the listed buildings but do not raise substantive matters for Historic England.

### **Relevant policy and guidance**

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the obligation on local planning authorities to pay special regard to preserving the special interest of listed buildings and their settings, and special attention to preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies



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for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development. Relevant policies include: 201, 205, 206, 208, 209 and 212.

The London Plan 2021 provides the spatial development strategy for Greater London. Policy HC1 of the London Plan relates to heritage conservation and growth. Part C states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.

Other relevant policy and guidance documents include:

- The London Plan (2021)
- The City of London Local Plan (2015)
- The Brewery Conservation Area Character Study (City of London, 2000)
- Chiswell Street Conservation Area Design Guidelines (LB Islington, 2002)
- The Setting of Heritage Assets (GPA 3, Historic England, 2015)

## Recommendation

Historic England has concerns regarding the application on heritage grounds.

The proposals would cause harm to a range of designated heritage assets including several listed buildings, the Brewery and Chiswell Street Conservation Areas through development within its immediate setting.

The harm relates to the scale and bulk of the extension scheme which we consider would have an overbearing presence in views from the east along Chiswell Street towards Whitecross Street and from the north along Lamb's Passage. It will also be visible from the Barbican Podium at Ben Johnson House where its height, scale and bulk will be clearly apparent in relation to the range of listed buildings.

We consider that the harm would be greatest to the component designations of the former Whitbread Brewery that are listed Grade II and in respect of Partners House, Grade II\*. These buildings are also the heart of the Brewery Conservation Area and read in conjunction with the Chiswell Street Conservation Area to the north.

It is the harm to local street views of Partners House that would attract the most weight due to its exceptional significance as a Grade II\* listed building (NPPF, Para 205). However, it should be recognised that this is seen in the context of a wider group of



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Grade II listed buildings associated with the brewery and that this has collective significance. I therefore strongly recommend that the height of the proposed development is reduced so it would appear subservient to the listed buildings below.

The NPPF also states that, if harm is unavoidable, opportunities should be sought to minimise the harm (NPPF, Paras 201 and 212). While a reduction in the height of the proposals would lower the harm to listed buildings and the Brewery Conservation Area, opportunities to reduce its overall bulk and mass, potentially with more muted façade treatments, should be explored to help reduce its impact.

Given the extent of our concerns and to enable you to address these with the applicant, the necessary LBC authorisation has not been issued at this time.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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Mr Thomas Roberts  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Our ref: L01583525

19 December 2024

Dear Mr Roberts

**Arrangements for Handling Heritage Applications Direction 2021**

**Authorisation to Determine an Application for Listed Building Consent as Seen Fit**

**THE WHITBREAD BREWERY 52 CHISWELL STREET LONDON EC1Y 4SA  
Application No 24/00864/LBC**

Applicant:	Alasdair Buckle DP9
Grade of building(s):	II*
Proposed works:	Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening, external plant enclosures; facade alterations; internal alterations and associated works
Drawing numbers:	Drawing series 11602-EPR numbers 00-B1-DR-A-TP-0299, GF-DR-A-TP0300, MZ-DR-A-TP0301, 02-DR-A-TP0302, 03-DR-A-TP0303, 04-DR-A-TP0304, 05-DR-A-TP0305, RF-DR-A-TP0306, GF-DR-A-TP0320, 03-DR-A-TP0323-04-DR-A-TP-0324, RF-DR-A-TP0326, GF-DR-A-TP0330, 01-DR-A-TP0331, RF-DR-A-TP0336, 03-DR-A-TP0307, RF-DR-A-TP0308, EL-DR-A-TP0431, EL-DR-A-TP0432; and drawing series 11602-EPR-00-ZZ-DR-A-TP numbers 0500-0504 inclusive, 410-413 inclusive and 11602-EPR-00-EL-DR-A-TP0420 to 0424 inclusive.
Date of application:	12 August 2024
Date of referral by Council:	30 September 2024
Date received by Historic England:	30 September 2024
Date referred to MHCLG:	16 October 2024

You are hereby authorised to determine the application for listed building consent



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Historic England

referred to above as you think fit.

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]

NB: This authorisation is not valid unless it has been appropriately endorsed by the Secretary of State.



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**From:** [REDACTED]  
**To:** [PLN - Comments](#)  
**Subject:** Application: 24/00863/FULL & 24/00864/LBC  
**Date:** 23 December 2024 11:32:18

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THIS IS AN EXTERNAL EMAIL

Dear Ms Gelleh,

Thank you for consulting the Georgian Group on the amended plans for the Whitebread Brewery site. We acknowledge the amendments made to the proposed applications for Planning Permission and Listed Buildings, however they do not address our previous concerns.

The Group maintains its objection to the applications for Planning Permission and Listed Building Consent.

Kind regards,

Eddie Waller IHBC  
Conservation Adviser  
London and South East England



[Support the Georgian Group. become a member | georgiangroup.org.uk](#)

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Mr Thomas Roberts  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Our ref: P01583264

19 December 2024

Dear Mr Roberts

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HOTEL THE WHITBREAD BREWERY 52 CHISWELL STREET LONDON EC1Y 4SA  
Application No. 24/00863/FULL**

Thank you for your letter of 29 November 2024 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Historic England provided advice on the original application on 16 October 2024 in which I outlined our serious concerns about these proposals on heritage grounds.

Whilst amendments have subsequently been made to the scheme, the impact of the height, scale and bulk of the proposed roof extensions remain broadly similar. Our advice therefore remains unchanged, and I remain of the view that the development would cause harm to a range of designated heritage assets including several listed buildings, the Brewery and Chiswell Street Conservation Areas through development within its immediate setting.

As set out in our earlier letter, the harm relates to the scale and bulk of the extension scheme which we consider would have an overbearing presence in views from the east along Chiswell Street towards Whitecross Street and from the north along Lamb's Passage. It will also be visible from the Barbican Podium at Ben Johnson House where its height, scale and bulk will be clearly apparent in relation to the range of listed buildings.

We consider that the harm would be greatest to the component designations of the former Whitbread Brewery that are listed Grade II and in respect of Partners House, Grade II\*. These buildings are also the heart of the Brewery Conservation Area and read in conjunction with the Chiswell Street Conservation Area to the north.



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It is the harm to local street views of Partners House that would attract the most weight due to its exceptional significance as a Grade II\* listed building (NPPF, Para 205). However, it should be recognised that this is seen in the context of a wider group of Grade II listed buildings associated with the brewery and that this has collective significance.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice letter of 16 October 2024 need to be addressed in order for the application to meet the requirements of the National Planning Policy Framework. In its current form, we object to these proposals.

Should your authority be minded to grant consent, careful consideration should be given to the conditions associated with it to secure the design outcomes aspired to by these proposals. Careful consideration should be given in particular to materials, junction details and securing repairs to historic fabric that are set out as public benefits prior to occupancy.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas



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