

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

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

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Gael Gamble

Address: Barkley House Castle Meadow Road Nottingham

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Other

Comment: The Secretary of State is the freehold owner of the site and should be consulted on/or give consent on design alterations particularly affecting the structure and exterior.

The building contains significant historical artefacts. Alternative arrangements need to be put in place to preserve and safe guard these items before any works can commence.

The building will cease to be a HMRC operational site in July 2021.

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Case Officer: Sonia Williams

Customer Details

Name: Mr Peter Wright

Address: 24 Recreation Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I wish to object to the proposed development on the grounds it would result in unacceptable harm to the special architectural and historic interest of the grade I listed building. Although many aspects of the proposals are to be welcomed, including providing public access, the harmful aspects are wholly unwarranted and not outweighed by public benefits. It would be unthinkable to add a pair of highly visible glass boxes to the roof of Somerset House, which is entirely comparable in style and significance, so it is unclear why this is being contemplated here.

The low level of harm attributed to the proposed works by the applicant and HE is inaccurate. Harm should be assessed directly in relation to the significance of the heritage asset affected (NPPF para 193), which is mutually acknowledged as exceptionally high. The changes to the form of the building at roof level are undisputedly detrimental to the building's special interest. A key element of the building's significance is its Classical composition, with a clear hierarchy descending from the central block to the subsidiary wings. The PPG advises that "... in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special interest." With this in mind, the impact of the roof additions would arguably meet the test for substantial harm, or at least a high level of less than substantial harm. Furthermore, the imposition of the proposed rooftop additions would result in harm to the setting and significance of Billingsgate Market and the spire of St Dunstan in the East, which would be foregrounded by a reflective, illuminated box and associated roof terrace paraphernalia. The application does not convincingly demonstrate that a less harmful scheme, i.e. without incongruous changes to the roofline, would be any less achievable with the same benefits and I urge the City to reject it accordingly.

Begum, Shupi

From: Adjei, William
Sent: 08 February 2021 13:05
To: Begum, Shupi
Subject: FW: Billingsgate and Custom House

From: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Sent: 29 January 2021 13:48
To: DBE - PLN Support <DBEPLNSupport@int.cityoflondon.gov.uk>
Subject: FW: Billingsgate and Custom House

Please download to 20/00631/FULMAJ and 00632/LBC

Many thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: Jennifer Freeman [REDACTED]
Sent: 27 January 2021 11:53
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: Fwd: Billingsgate and Custom House

Dear Ms Williams,

I write with reference to current planning proposals for the grade1 listed Custom House by David Laing, 1813, on Lower Thames Street. (The east end was of course destroyed in WW11 and rebuilt with a restored facade).

I am familiar with Sir Horace Jones' former Billingsgate Fish Market which stands on the riverfront directly west of the Custom House. Following a repurposing of this building some years ago the terrace in front of the Market facing the River Thames was successfully opened, giving access to the public to admire the buildings and the view across the River.

For many years the Custom House has been effectively closed to the public and the proposal to adapt it for hotel use offers a similar positive opportunity. There might also be pre-arranged access to the Long Room on HODS and other occasions.

I would be grateful if you could take these comments into account.

Yours sincerely'

Dr Jennifer M. Freeman OBE

Historic View of Custom House and Billingsgate Market from the South Bank



Begum, Shupi

From: Jennifer Freeman [REDACTED]
Sent: 02 February 2021 14:50
To: PLN - Comments
Subject: Custom House

My address is 8 Kensington Gate London W8 5NA

Jenny Freeman

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Re: Application Consultation (20/00632/LBC)
Date: 15 July 2021 15:08:32

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

I respond in connection with the current proposals for the conversion of the listed Former Custom House on Lower Thames Street and associated river wall, stairs and crane.

Generally, it appears that the applicants have failed fully to 'take on board' the uncompromising, yet elegant classical language of the Custom House and seek to adapt the building, somewhat arbitrarily, to modern hotel 'requirements' and activities.

The application for additional rooftop newbuild seems excessive, given the large size of the Custom House, and will disrupt views across the Thames from shipping and the South Bank. Surely the existing envelope of the building offers scope for sufficient numbers of rooms?

There appears to be an attempt to 'the prettify the riverside terrace with 'soft ' landscaping whereas its character as a unique, formerly 'working' yard with associated features might be retained with interesting reminders of past usages.

The proposed terrace at first floor level suggests an aggressive amount of intervention and 'over-conversion ' to suit what are thought to be modern expectations.

The equal access requirements should be addressed in a less intrusive manner, retaining historic stairs etc.

The Custom House is a handsome, impressive, stern structure thus attempts to adapt it for hotel use should play to its strengths and uniqueness as a venue.

Provision must be made for the former Long Room, long hidden from view, to be open to the public on specified days and as much as possible of the original internal layout be retained and adapted sensitively for current uses.

Yours sincerely,

Dr Jennifer M. Freeman OBE HonDoctArts IHBC FRSA FSA BAHons DiplGrad
Cons(AA)

On Tue, 13 Jul 2021 at 14:49, <PLNComments@cityoflondon.gov.uk> wrote:

Dear Sir/Madam

Please see attached consultation letter for planning application 20/00632/LBC (Custom House 20 Lower Thames Street & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE).

Kind Regards

Planning Administration
Department of the Built Environment
City of London

Comments for Planning Application 20/00632/LBC

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Case Officer: Sonia Williams

Customer Details

Name: Dr Rosemary Yallop

Address: 23 Norland Square London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I wish to record my objection to the scheme proposed for the re-purposing of this architecturally significant building which occupies such a sensitive position on the waterfront of the City of London.

As currently framed the scheme entails an intolerably high degree of intervention both internal and external. My reading of it is that it provides insufficient guarantees that internal detailing and proportion will be safeguarded; the proposed changes to the exterior and the roofline in particular

are out of scale and jeopardise the legibility of the historic design. While I applaud the wish to create a new and viable life for this historic building the current scheme is far too intrusive and the applicants should be encouraged to find a more sensitive solution.

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Case Officer: Sonia Williams

Customer Details

Name: Mrs Philippa Woodcock

Address: 3 Lennox Row Edinburgh

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This is a magnificent building of national importance and I take the Georgian Society's view that it could be altered to something akin to the work that has been done for Somerset House. When the present government proposes to make the UK 'great' and reach out worldwide for trade, (not that we weren't anyway) would this not be a good place to celebrate such sentiment? In the current circumstances London cannot need any more hotels.

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Case Officer: Sonia Williams

Customer Details

Name: Mrs Tracy Cowell

Address: 1 Harebell Close Minster Sheerness

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I do not feel another luxury hotel is needed especially at the expense of this amazing historic building.

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Case Officer: Sonia Williams

Customer Details

Name: Ms J D Morris

Address: 24 Shad Thames London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: I am writing as a long-time resident based on the south side of the river. For decades I have regularly used both banks of the river as a public amenity, for leisure walking and transit between places. Any future development of the Custom House must ensure full public access to the riverside without constraint. It should also allow public access to at least some of the building - Somerset House at Waterloo is a good model to refer to. This is an opportunity to put the ideas of post-COVID "build back better" into practice. The current proposals do not meet this.

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Case Officer: Sonia Williams

Customer Details

Name: Miss Susan Davenport

Address: 21 Bettridge Road London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I have read the objections that The Georgian Group has registered with the City of London Corporation and I would like to lend my endorsement of, and support to, the issues that it has raised. This is a Georgian gem and must be preserved at all costs.

Begum, Shupi

From: John Kent [REDACTED]
Sent: 14 February 2021 19:40
To: Williams, Sonia; Moss, Alastair
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Sir,

Id like to add my objections to the above.

There are plenty of hotels in London and only one custom house. There is a lot of history attached with this building that contains the first and greatest long room in HM Customs.

There is no customs museum and this would be a far better use for the building

John Kent

58 Elmdale close

#warsash

Southampton so31 9rx

Begum, Shupi

From: Graham Taylor [REDACTED]
Sent: 14 February 2021 18:45
To: Williams, Sonia
Cc: Moss, Alastair
Subject: PLANNING OBJECTION

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

I am writing to urge you to reject the above applications for redevelopment of the Custom House. These proposals would do unnecessary harm to Grade 1 listed building which is of central importance to the City of London's heritage. They would also remove all opportunity for public access, which seems counter to the Corporation's stated policy desire to do the opposite.

Yours sincerely

Graham Taylor

'Jeanie Deans'
Harbourmaster's Office
46 Goodhart Place
E14 8EG

Begum, Shupi

From: Lizebeth Burch [REDACTED]
Sent: 14 February 2021 18:11
To: Williams, Sonia
Cc: alistair.moss@cityoflondon.gov.uk
Subject: Customs House!

Is there no end to the WANTON DESTRUCTION of historic City Buildings? Now you propose to redevelop this magnificent structure to fit in with the financial aims of yet another person who isn't even a resident of London. We emphatically say "NO WAY" should this be allowed to happen.

You must surely recognise the heritage and value of this building. It should be used, at least in part, for the benefit of the public, and not compromised for future generations, as so many structures around London have recently been — or, completely pulled down. What is the point of having a London that looks like every other city in the world? Much of the East End has already been ruined by generic slab buildings which now will most likely stay largely empty after the pandemic, and will last only a few years before they, in turn, will be replaced.

DO NOT CHANGE THE EXTERIOR OR INTERIOR OF THE CUSTOMS HOUSE to suit a developer's whim. Do we need another hotel, at this point in time, anyway? SAVE Britain's Heritage have an alternate scheme which is of significant value in presenting a workable alternative. The Tate Modern and Somerset House already exist as very successful reimaginings of historic buildings. Please, we beg you not to add the Customs House to those which have succumbed to greed and a disregard for history.

Thank you for your attention.

Don and Lizebeth Burch
25, Maiden Lane
London WC2E 7NR

Sent from my iPad
History Belongs To The Public

Begum, Shupi

From: Peter Hilliard [REDACTED]
Sent: 14 February 2021 17:45
To: Williams, Sonia
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

To whom it may concern

I should like to object to the change of use of The Custom House , This building has played such an important part in our heritage that it needs to be kept accessible to the public and not become another pointless Hotel , I am a stonemason involved in conservation and am saddened at how our most important buildings are lost to big business and not celebrated .

Regards Peter Hilliard
9a Blurton Road
London E5 0NL

Begum, Shupi

From: [REDACTED]
Sent: 14 February 2021 16:41
To: Williams, Sonia
Cc: Moss, Alastair
Subject: OBJECTION

20/00632/LBC
20/00631/FULMAJ

CUSTOM HOUSE, LOWER THAMES STREET

For some while I worked as a tutor for HM Customs and Excise based at the Custom House and strongly object to the application to turn it into an hotel. The City does not need yet another "luxury" hotel and this historic building should be kept int the public domain.

I will also take this opportunity of saying how appalled I am at some of the truly hideous blocks which been allowed within the City with no apparent consideration for either scale or sympathetic design.

Pauline Robertson
Penthouse 2,
Cromwell Court,
Cromwell Road,
Hove,
East Sussex, BN3 3EF

Begum, Shupi

From: David Trillo [REDACTED]
Sent: 14 February 2021 15:57
To: Williams, Sonia
Cc: Moss, Alastair
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJyour The Custom House

Dear Ms Williams

The Custom House is a Grade 1 building. It is scandalous and bizarre that a developer based out of the UK should even think that he can turn it into a hotel. The building and its predecessors are steeped in centuries of English history. To turn it into a hotel will require the destruction of the inside of the building and to put another level on the roof will destroy the very fine external roofline of the building. The Custom House would lose all reason.

The City of London can lean on its own planning committee to agree with plans for buildings and has a record for doing so. It does not have a good record for retaining its heritage buildings. The Western Smithfield buildings are a good example and they were only saved because they were "called in". The City's plans for the future refer to "office led cultural use". If the City does not follow their plan the Custom House will become an ultra-expensive hotel at the expense its working history and its building heritage. It will be another loss to Londoners.

I write to express my deepest objections to the redevelopment being proposed for the Custom House.

Yours sincerely

David Trillo
45 Ellington Street
Islington
London N7 8PN
[REDACTED]

Begum, Shupi

From: Andrew Shields [REDACTED]
Sent: 14 February 2021 15:40
To: Williams, Sonia
Cc: Moss, Alastair
Subject: Custom House development - OBJECTION

I am writing to object to the proposal from the offshore leaseholders of the Custom House to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel. The building should be put back to public use for all Londoners, in line with the attractive alternative scheme developed by SAVE Britain's Heritage.

I object in particular to:

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

I wish to be kept informed of further developments relating to this proposal.

Andrew Shields
9 Hartley Road
London E11 3BL
[REDACTED]

Haven Cottage
Church Street
Norton Saint Philip
Bath
Ba2 7LU

14 February 2021

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

Dear Sir/ Madam,

I understand that since HM Revenue and Customs vacated the Custom House it has been leased to an offshore property developer based in the Bermuda tax haven, the irony of which can not be lost on anyone. Further, I see that this developer has submitted a planning application to convert the Custom House into a luxury hotel. The Custom House is a grade 1 listed, publicly owned building with suites of unique Georgian offices which will be destroyed under the proposals. Moreover, the addition of two light box bars to the roof will seriously compromise the river frontage.

As I am sure you are aware, Save Britain's Heritage have prepared an exceptionally fine alternative scheme taking advantage of the location and the potential for turning the magnificent Long Room into a public space for all. This scheme also incorporates enhanced pedestrian access from the City to the Thames, something sadly lacking at present. Under these proposals the interior could be put to a variety of uses including small well ventilated office spaces, the need for which has become increasingly apparent during the Covid pandemic, alongside exhibition halls and galleries. The outstanding success of riverside precedents like Somerset House and the Tate Modern confirm the viability of the latter.

Another crass hotel depriving Londoners and visitors of a potentially splendid public space is highly undesirable, and I should like to object most strongly to the above planning applications. This wanton destruction would be a loss to us all and is both morally questionable and aesthetically repellent. I would urge you to do everything within your power to reject this application.

Yours faithfully,

Josephine Eglin

Begum, Shupi

From: Williams, Sonia
Sent: 15 February 2021 09:06
To: DBE - PLN Support
Subject: FW: 20/00632/LBC and 20/00631FULMAJ

Please download to 20/00631 and /632

Thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: Melissa Delano [REDACTED]
Sent: 14 February 2021 20:37
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: 20/00632/LBC and 20/00631FULMAJ

Dear Ms. Williams, I write to urge that your committee reconsider turning your beautiful, historic Custom House into a "luxury" hotel. I have seen this phenomenon occur here in our beautiful "City Different", Santa Fe New Mexico USA. For example, the old Saint Vincent Sanatorium/Hospital was converted into a Drury Group hotel that we now refer to as the "Dreary". These types of developments do not in any way benefit or include the local community beyond the use of cheap labor. We need more housing for our local population and could really use more affordable work/live type spaces. Lots of cities are facing these same issues and wouldn't our historic properties be put to better use as something that would attract visitors and locals alike? We can't afford to alienate our local population and sometimes it is worth the effort to create more inclusive alternatives. At some point life has to be about more than the almighty buck. Thank you for your consideration. Sincerely, Melissa Delano PO Box 1820 Santa Cruz NM 87567 USA

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: Objection
Date: 05 March 2021 17:44:35



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Elizabeth Gaskill [REDACTED]
Sent: 14 February 2021 14:43
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection

Dear Madam Williams,

I am writing to object to the plans to redevelop the Customs House into a luxury hotel. It is a Grade I historic building and should be made available to public use to all Londoners - and perhaps visitors as well.

I love London and have visited it more often than any other city since I moved to Amsterdam (from the United States) in 1986. I am now a Dutch citizen. It would sadden me to see this engaging historical building desecrated.

I heard about the proposed plans by reading the following and I am very much against this "unsympathetic and destructive conversion":

The offshore leaseholders of the Custom House want to undertake an unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel.

- **The exclusivity of the luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.**
- **The hotel development will destroy suites of Georgian offices that are a unique survival.**

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

Please try to block these plans!

Sincerely yours,
Elizabeth Gaskill
Oeverpad 593
1068PM Amsterdam

Adjei, William

Subject: FW: Custom House Development proposed Hotel

From: jackie randall <
Sent: 14 February 2021 09:55
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: Custom House Development proposed Hotel

I object to this planning application on the grounds the building contains historical grade II listed architecture which is a part of London's heritage and is better used not for private financial gain but for the Community of London.

Kind Regards

Jackie Randall
65 Cherry Tree Rise
Buckhurst Hill, IG9 6EZ

Sent from my iPhone

Adjei, William

Subject: FW: Customs House redevelopment

From: Richard Wiseman
Sent: 14 February 2021 12:22
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Customs House redevelopment

20/00632/LBC and 20/00631/FULMAJ CUSTOMS HOUSE REDEVELOPMENT

I am writing to object in the strongest terms to the proposal. I do so on the following grounds:

This is an historical building of utmost importance. Yet, the developers propose to make changes which will permanently disfigure it. The external changes, particularly the light box pavilions, however well designed, are unnecessary, unhistorical and are intended to pander to hotel guests many of whom will come to London to experience what is left of the City.

The destruction of internal rooms and spaces, particularly offices will be an act of vandalism rarely seen on this scale in such an important building.

How can owners of other listed buildings be persuaded that conservation issues are to be taken seriously when something like these proposals are permitted or even encouraged.

I can think of only one building of its sort that was allowed to be destroyed in a similar way, namely Soane's Bank of England. At least in that case, the new architect had some sense of sympathy with the original exterior. How much better would the architecture of the City be if the building had been allowed to stand.

As is so often the case, the proposals are an act of hubris on the part of all concerned, with self-serving justification which bears not the slightest scrutiny.

Richard Wiseman

18 Reynolds Close, NW11 7EA

Adjei, William

Subject: FW: OBJECTION - proposed redevelopment of the Customs House

From: Colin Eastaugh
Sent: 14 February 2021 08:40
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION - proposed redevelopment of the Customs House

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

Dear Sirs

Do we need another luxury hotel along the River Thames? Of course the answer is no. Do we need more heritage space in the Lower Thames Street area? The answer is yes.

City of London's City Plan 2036 is proposing a preference for 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic. Another luxury hotel in such a prominent position seems to go against the spirit of the City of London's proposals.

It is also disappointing to note that the property developer will destroy suites of Georgian offices and add two light box pavilions as bars on the roof which will compromise the principal frontage. In summary destroying both the interior and exterior fabric of the building.

It is a miracle that Customs House has survived so long, survived WWII and the planning authorities of the past. Fingers crossed the planning authorities of the 21st century don't end up destroying this wonderful building.

Regards.

Colin Eastaugh
58 Foyle Road
London
SE3 7RH

Adjei, William

Subject: FW: OBJECTION - proposed redevelopment of the Customs House

From: Colin Eastaugh
Sent: 14 February 2021 08:40
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION - proposed redevelopment of the Customs House

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

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It is also disappointing to note that the property developer will destroy suites of Georgian offices and add two light box pavilions as bars on the roof which will compromise the principal frontage. In summary destroying both the interior and exterior fabric of the building.

It is a miracle that Customs House has survived so long, survived WWII and the planning authorities of the past. Fingers crossed the planning authorities of the 21st century don't end up destroying this wonderful building.

Regards.

Colin Eastaugh
58 Foyle Road
London
SE3 7RH

Adjei, William

Subject: FW: OBJECTION

From: Lynda Bailey
Sent: 14 February 2021 10:18
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

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

Good morning

I have just heard of the proposed development of the Custom House to become a luxury, exclusive hotel. Please stop this.

The City Plan is for such places to be adapted to encourage more people and different types of people to enjoy our heritage. A hotel does none of this.

I am also disturbed that Georgian offices, pretty much untouched, will be damaged or removed altogether. These are precious!

Please stop London becoming ever more remote from the people who live in it. A Custom House has been an important part of our history since before Chaucer's time. Millions of Londoners could learn about what happened here – good and bad – and enjoy the marvellous spaces inside.

Regards

Lynda Bailey

Flat9, 2 Carpenters Place, London SW4 7TD

Adjei, William

Subject: FW: OBJECTION

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

From: Helena Smith

Sent: 14 February 2021 07:49

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>

Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>

Subject: OBJECTION

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

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Ms Williams,

I am writing to say that I strongly object to the proposed redevelopment of the Customs House as a hotel. This building is part of London's history, and its development should benefit as many Londoners as possible, not a privileged wealthy few. In addition, the development should be made in such a way that acknowledges and explores the role of the building in London's history, and respects the architecture of the Customs House.

A great example of such a building being used for the public good is Somerset House. A reimagined Customs House would open up a wonderful stretch of the Thames as a promenade for Londoners, as well as an intriguing building. It is a great opportunity for the city, not simply an opportunity for a developer to make money.

Yours sincerely,

Helena Smith

--

10 Tomline House

Union Street

London SE1 0ET

Adjei, William

Subject: FW: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Vicky Stewart
Sent: 14 February 2021 10:20
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams

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

OBJECTION

I am appalled at the proposal to convert the Custom House into an exclusive luxury hotel and believe this historically significant Grade 1 building should be restored for public use.

The City of London's 'City Plan 2036' ambition to 'open heritage spaces to attract a wider cultural demographic' would be ignored in favour of private use by the rich elite.

The Georgian offices would needlessly be destroyed.

The light-box pavilions on the roof would detract from the integrity of the principal frontage.

Please do not allow this development to take place.

Yours sincerely
Vicky Stewart
10c Petticoat Tower
Petticoat Square
London
E1 7EE

Adjei, William

Subject: FW: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Jamie Surman <
Sent: 14 February 2021 08:04
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Jamie Surman
122 Willoughby House
Barbican
London EC2Y 8BL

14 February 2021

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

Dear Ms Williams,

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

Please accept this letter as an objection to planned proposals to alter the purpose of Custom House's use. Custom House is a Grade I listed building of national importance. Proposed plans seek to alter the fabric of the building irreparably and prevent it from being for public use.

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

Additionally, the original layout of Georgian offices would be destroyed by the plans and the addition of two light box pavilions on the roof would compromise the principle frontage.

SAVE Britain's Heritage have put forward excellent plans for an alternative, that would ensure the building is in public use, as has been successfully illustrated at Somerset House further down the river. This would also help regenerate a largely ignored stretch of the river past Tower Hill, and take full advantage of its excellent position for all to enjoy. I implore you and your colleagues to consider this as a serious option.

https://mcusercontent.com/9ea03bb11e3ccc82634488e2b/files/89340061-ef7a-407b-bf18-01a31aabd800/2003_SAVE_CUSTOM_HOUSE_6_.pdf

Yours sincerely,

Jamie Surman

Flat 1, 90 Bootham
York
YO30 7DG

For the attention of

Sonia Williams, Principal Planning Officer, City of London

Alastair Moss, Chairman Planning and Transportation Committee, City of London

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

14 February 2021

Dear Ms Williams and Mr Moss,

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

I write with regard to Planning Applications 20/00632/LBC and 20/00631/FULMAJ to object to the proposed redevelopment of the Custom House, a grade I listed building, and its conversion to a luxury hotel. The proposals will be destructive to the fabric of the grade I listed building and

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

I would ask you to consider this objection carefully and fully, bearing in mind that London is a place that millions call home, as well as being a major commercial centre and international travel destination. The fabric of buildings such as the Custom House constitutes a heritage asset which is "owned" by – and should be accessible to – us all. We have a responsibility of stewardship as citizens, to ensure that the asset is protected and shared widely.

Yours sincerely,



Shirley Collier MBE

Adjei, William

Subject: FW: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Caroline Murray
Sent: 14 February 2021 12:27
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Madam and Sir,

I note with complete dismay the plan to convert the Grade-I listed London Customs House into a 'luxury hotel', with severe internal destruction and the marring of the external appearance as part of this process.

It is disgraceful in the first instance that HMRC have offered the building to a private developer, rather than making it available for cultural public use, as defined in the City of London's policy outlined in the City Plan 2036. It is also completely unclear that London will have the need for yet another 'luxury hotel' (see for example the ludicrous proposal for the Whitechapel Bell Foundry in Tower Hamlets, currently up for appeal) for the foreseeable future.

But my main concern is that this is yet another example of the pursuit of profit by private developers which is being allowed to destroy the irreplaceable historic fabric of the city for their own short-term gain and for no benefit (indeed, rather the reverse) to the inhabitants of London.

I very much hope that the planning committee will reject this proposal, and stand their ground if /when the developer lodges an appeal.

Yours sincerely,

(Dr) Caroline Murray

23 Tenison Avenue
Cambridge
CB1 2DX

Adjei, William

Subject: FW: Objection

From: tricia kelly <
Sent: 14 February 2021 11:31
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection

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

Though I am obviously not visiting much at present I have spent several years working at various points along the north bank of the Thames and value the many lesser-known historic elements to be found there.

I was horrified therefore to hear of the proposed changes to the Custom House being put before you in these applications. This little-known and much under-appreciated building has such potential to become a major public building, a flagship and long-term asset for the City. Instead, these proposals rip out its historic heart (the near uniquely intact Georgian offices in one wing of the building) and blemish its face with glass-box bars.

I can understand that there is not much hotel accommodation within the City itself, but there is plenty in the wider area. At best if the venture is successful it is likely to increase the number of coaches manoeuvring around Lower Thames St. However, the current pandemic means tourism is at its lowest ebb for over a generation and is unlikely to recover fully for several years. This proposal is therefore wrecking a Grade 1 listed building to create an hotel with what must now be a dubious business case. The proposal is also in contradiction to your own policy in the City Plan 2036, which looks to 'office-led cultural use'.

This building gives a magnificent opportunity to encourage the aims of the plan, steering the future of this building towards something that will give wider public access while maintaining its historic features. The Customs House in its various iterations on this site has been at the heart of London trading for centuries. Surely as the country is looking to widen its trading horizons once more there must be a use for it that embodies pride in its past glories while encouraging growth and celebrating its future? Using part of its office space for start-ups or small companies for instance, while opening up the Long Room, even if this means parts are shut at times for events.

I do hope this change of use will be voted down and this vital part of the City's history protected for Londoners.

Yours sincerely
Patricia Kelly
Oak Lodge
Mill Rd
Gt Totham
CM9 8BR

40 Rutherford house, 483 Battersea Park Road London SW11 4BT

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

14 February 2021

Dear Sirs,

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

I am writing to object to this planning application to convert the historic Customs House into a hotel.

Customs House is a listed building that has played an important part on the history of this country and is a star in the City's heritage. I understand that there are other better proposals that take account of the building's importance and would preserve it for the benefit of the City and its residents. Somerset House is an example of what is possible.

It would be wrong for a hotel development to destroy the building's unique suites of Georgian offices.

The future of the building should follow the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic.

Although I am retired now, my entire career was spent as a City solicitor. During this time I came to appreciate the City's history and magnificent buildings such as Customs House.

I hope the application will be refused.

Yours sincerely

Peter Smith



Adjei, William

Subject: FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

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

From: alison homewood <

Sent: 14 February 2021 06:36

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>

Cc: alastair.moss@cityoflondon.gov.uk

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

OBJECTION

I am writing to object strongly to the proposal by developers to redevelop the Grade-1 listed Customs House into a luxury hotel.

This would be a heritage sacrilege. This handsome, imposing building is a unique symbol of London's history, both maritime and commercial. In uncertain times for Britain as we step out into a post-Brexit world we need to safeguard these unique remnants of our history as they will be the magnet that bring back the tourists. London has an over-supply of elegant and expensive hotels in the city and on the river; it does not need another one.

SAVE Britain's Heritage has demonstrated what successful re-uses historic buildings can be put to, notably with Smithfield's Market and the Museum of London. Please refuse this planning application, don't let any more of my beautiful London be destroyed by overseas developers with no cultural soul and only seeking commercial profit.

ALISON HOMEWOOD
31 Colebrooke Avenue
London W138JZ

Adjei, William

Subject: FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Glenn Leeder

Sent: 14 February 2021 09:08

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>; Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>

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

OBJECTION

I regularly walk along the Thames in front of the Custome House. It is a beautiful building.

It is my belief that the leaseholders of the Custom House want to undertake an ugly and destructive conversion of this listed Grade I historic building into a luxury hotel. I believe it should be put back to public use for all Londoners and visitors, not just the wealthy.

My points of objection are -

- The exclusivity of the proposed luxury hotel development contradicts the City of London's policy as outlined in the City Plan 2036, which gives preference to 'office-led cultural use,' as part of the City's ambition to open heritage spaces to attract a wider cultural demographic. The City of London has the opportunity to extend the area in close vicinity to the Tower of London to include cultural and visitor attractions within easy walking distance of the Tower. This is a unique heritage space and should not be lost to the public.
- The hotel development will destroy suites of Georgian offices that are a unique survival.
- The hotel development will add two light box pavilions as bars on the roof which will compromise the principal frontage. Surely these light boxes cannot be allowed to be added to a Grade 1 listed building. You are the guardians of our heritage. Please do not let developers destroy it.

I urge you to reject this proposed development.

Glenn Leeder
25 Folgate Street
LONDON E1 6BX

Adjei, William

Subject: FW: Quote Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Stephen Clarke

Sent: 14 February 2021 12:12

To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>

Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>

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

I write to object to your plans to replace the London Custom House with another Hotel.

Efforts must be made to preserve our hereditary buildings in some form.

Steve - Sent from my iPad

53, Burwell Road, Leyton E10 7 QG

Adjei, William

From: PLN - Comments
Subject: FW: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

From: Simon Ward
Sent: 15 February 2021 11:54
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams,
I am writing to object to the above planning applications regarding the redevelopment of the London Customs House building.

My objection centres on the concerns highlighted by the Georgian Group and others about the damage the plans would cause to a priceless and irreplaceable piece of our architectural heritage.

Furthermore if the proposed development proceeds the site would be inaccessible to the majority of the general public. This would be to waste a huge opportunity to revitalise an imposing historic riverside building. That this is achievable is amply demonstrated elsewhere on the river in Somerset House, a similar Georgian office building which has been completely reimagined, while retaining its intrinsic beauty and interest. Why should the Customs House not be treated with the same respect?

I urge the Corporation to reject these unsympathetic proposals and to reconsider how best this great building can be brought back into use, ensuring that it can be enjoyed for hundreds of years to come.

Yours sincerely,
Simon Ward
8 St Thomas's Place,
London
E9 7PW

Begum, Shupi

From: Williams, Sonia
Sent: 05 March 2021 17:45
To: PLN - Comments
Subject: FW: OBJECTION TO PROPOSED REDEVELOPMENT OF THE CUSTOM HOUSE

Categories: Red Category

Please download to 20/00631 and 00632 and acknowledge

Thanks

sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: Ruth Fleming [REDACTED]
Sent: 14 February 2021 14:32
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION TO PROPOSED REDEVELOPMENT OF THE CUSTOM HOUSE

I am writing to inform you of my objections to the proposed redevelopment of the Custom House REF 20/00632/LBC and 20/00631/FULMAJ.

I strongly object to this wonderful and historically significant building which is Grade 1 listed being converted into a luxury hotel. The offshore leaseholders have submitted applications to seek permission to convert this historically significant building to a luxury hotel. The plans reveal that the conversion will be destructive and is unsympathetic.

The City of London City Plan 2036 gives preference to 'office-led cultural use' as part of the City's ambition to open historic spaces to attract a wider cultural demographic. The Customs House should be put back into public use for all Londoners.

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

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

London does not need another luxury hotel, and should not squander yet another important piece of our historical and cultural heritage.

Please acknowledge receipt of my objections.

Ruth Fleming

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

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

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Rachel James

Address: Eastington Farm Worth Matravers Swanage

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The importance of keeping public access and the integrity of an important Georgian building

Adjei, William

From: PLN - Comments**Subject:** FW: OBJECTION to plans for the Customs House - 20/00632/LBC and 20/00631/FULMAJ

Dear Sonia Williams

I wish to object to the planning application to convert the historic Custom House on the Thames into a hotel, which will entail the demolition of parts of the Georgian building and the entirely inappropriate addition of two light-boxes on the roof. This historic building with its Thames frontage should be imaginatively re-developed as an amenity for Londoners and visitors alike; perhaps in the manner of the Somerset House which attracts large numbers of people to its cultural activities.

The development of luxury hotel seems inappropriate for the site and building, particularly as the building's importance is reflected by its Grade 1 listed status.

I would like this objected to be forwarded please.

Mary Peskett Smith

8 The Old School

Princeton Street

London

WC1R 4AY

Adjei, William

From: PLN - Comments**Subject:** FW: OBJECTION to plans for the Customs House - 20/00632/LBC and 20/00631/FULMAJ

Dear Sonia Williams

I wish to object to the planning application to convert the historic Custom House on the Thames into a hotel, which will entail the demolition of parts of the Georgian building and the entirely inappropriate addition of two light-boxes on the roof. This historic building with its Thames frontage should be imaginatively re-developed as an amenity for Londoners and visitors alike; perhaps in the manner of the Somerset House which attracts large numbers of people to its cultural activities.

The development of luxury hotel seems inappropriate for the site and building, particularly as the building's importance is reflected by its Grade 1 listed status.

I would like this objected to be forwarded please.

Mary Peskett Smith

8 The Old School

Princeton Street

London

WC1R 4AY

From: [Williams, Sonia](#)
To: [DBE - PLN Support](#)
Subject: FW: OBJECTION
Date: 15 February 2021 17:03:13

From: Charles Rumbles
Sent: 15 February 2021 15:28
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Alistair.Moss@cityoflondon.gov.uk
Subject: OBJECTION

Dear Sonia,

PLANNING APPLICATIONS 20/00632/LBC and 20/00631/FULMAJ.

I wish to object to the planning application to convert the former Custom House building in Lower Thames Street, London into a hotel.

I moved from Scotland at age 18 to begin my career with HM Customs & Excise on 29 October 1973. Custom House, Lower Thames Street was my first office of employment. The building has a rich economic history and should be preserved as a Customs museum or similar social space.

Regards

Charles K Rumbles

6 Pitcaple Gardens
Bellsquarry, Livingston
West Lothian, EH54 9HW
Scotland, UK

Begum, Shupi

From: Williams, Sonia
Sent: 15 February 2021 09:04
To: DBE - PLN Support
Subject: FW: OBJECTION

Please upload to 20/00631 and 632

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Deborah Merrett [REDACTED]
Sent: 15 February 2021 07:47
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

To whom it may concern,

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

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

I wish to object to the above proposals. I set out my reasons below:

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

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

For these reasons I am placing an objection to the above proposal.

Yours,
Deborah Merrett
9 Cookes Wood, Broompark. Durham DH77RL

From: [Williams, Sonia](#)
To: [DBE - PLN Support](#)
Subject: FW: Custom House Planning Application
Date: 15 February 2021 12:52:54

From: Jill Wilson
Sent: 15 February 2021 12:36
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>; Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Custom House Planning Application

Custom House Planning Application - 20/00632/LBC & 20/00631/FULMAJ

I am writing to you about the above application and the plans to turn The Customs House into a luxury hotel.

My initial reaction when I heard about it was that there must be something more imaginative which could be done with the building as there are so many other new hotels springing up all over London and hotel saturation point must be reached soon! Surely could be an alternative scheme which would have more benefit for the public? An art gallery? Exhibition space? Cultural/education centre? The possibilities are endless....

However having studied the plans and seen how much of the original building is going to be retained in the proposal, I have warmed to the hotel scheme and think that the Customs House could make a stylish and popular hotel, provided that they do actually adhere to the slightly worrying words that original features will be "reused if possible"... Who decides what is possible?

My hackles also rose when I saw the words "retaining the existing facade" on the eastern block as there has been a plague of ridiculous facadism happening recently when perfectly good buildings have been destroyed with only their facades remaining to hide soulless developments behind. But it sounds like the Eastern wing is already in the facaded category having been rebuilt since the war, so one hopes that the new building would be complementary to the existing Western wing and the original building.

There are several positives in the proposed scheme (provided the developers actually stick to them!!).

The river terrace could be a lovely new public space with great views over the Thames, and one hopes that people would be genuinely welcomed into the internal spaces like the Long Room.

I can also understand why the developers want to put the two cafes onto the roof as again these would provide some brilliant views over the City and the Thames. But why oh why do they have to be such a dull design?? At the moment they are an eyesore, and

completely out of keeping with the existing building, and would look particularly strange when lit up at night. With my designer's hat on I can see that it would make a huge difference if the roof line of the cafes were to continue on the same angle as the existing roof - if the plans are accepted, perhaps that could be a tweak you could stipulate?

Whatever the outcome of the application, I trust that you will do everything you can to protect this historic and interesting building for future generations.

Best wishes

Jill Wilson
Broadside
Kent Hatch Road
Oxted
Surrey RH8 0SZ

Begum, Shupi

From: Williams, Sonia
Sent: 17 February 2021 08:58
To: DBE - PLN Support
Subject: FW: OBJECTION TO PLANNING APPLICATION FOR LONDON CUSTOM HOUSE
Attachments: PLANNING APPLICATION CUSTOM HOUSE.docx

Categories: Red Category

Please download e mail and attachment to the 2 applications and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: ann [REDACTED]
Sent: 16 February 2021 20:31
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION TO PLANNING APPLICATION FOR LONDON CUSTOM HOUSE

Dear Ms Williams

Please find attached my objection to the planning application **Planning Applications 20/00632/LBC and 20/00631/FULMAJ**

I worked in Custom House for some years and find the proposals very sad. Particularly the light boxes destroying the outside of such a fine building.

Yours sincerely

Ann North
Mrs Felicity Ann North



Virus-free. www.avast.com

OBJECTION TO THE PROPOSED PLANNING APPLICATION TO CONVERT LONDON CUSTOM HOUSE INTO AN HOTEL

London Custom House is a wonderful historic building which deserves to be preserved as it is and not turned into a hotel for the rich and famous. The beautiful interior is full of character and historic importance particularly the Long Room and the basement. The Georgian rooms and the Main entrance Hall with memorials to Custom Officers who died both fighting for their country and in the course of their duties should be kept intact. Somerset House has not been sold off as a hotel but has become a venue for everyone. The Thames frontage is unique and should not be tampered with. The building is considered one of the pearls of the river and the building was often open to the public for the London Heritage weekend in September. Volunteers in period dress would act as guides and explain the history of the building particularly the wonderful Long Room.

Surely those in charge of the capital of our country should preserve its history and remind visitors of the wealth of beautiful and interesting places within it. Locals and visitors should be encouraged to use these wonderful spaces, for community space, museums, education etc. The City of London should look to its own citizens rather than always finding in favour of the money makers.

Please preserve London Custom House for us not as a hotel.

Begum, Shupi

From: Williams, Sonia
Sent: 11 March 2021 09:17
To: PLN - Comments
Subject: FW: OBJECTION - plans to redevelop Custom House

Categories: Red Category

Please download to 20/00631 and 00632 and acknowledge

Thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: Jon Petre [REDACTED]
Sent: 10 March 2021 17:34
To: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>; Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: OBJECTION - plans to redevelop Custom House

Hello,

I want to lodge my objection to the City's plans to redevelop Custom House as a luxury hotel development, i.e. applications 20/00632/LBC and 20/00631/FULMAJ.

Custom House has been a unique and critically important part of the City of London's history, and it would be a massive loss to the heritage and the prestige of the City if it were to be redeveloped as an identikit chain hotel. Under current plans, the addition of lightboxes to the building will damage the historic frontage of the building and gutting the Georgian offices will erase another part of the city's history.

During the lockdown, I discovered St Dunstan-in-the-East. I think it's my favourite park in London. With all shops closed and very few places to go, public spaces like St Dunstan's have been a refuge: a rare place where you don't need to pay to enjoy yourself and you feel aware of the City's rich texture and accessibility. It's a testament to the City as a place to be lived in - a place where, no matter how times change, the environment is designed for everyone to enjoy. I view Custom House in much the same way: as, like St Dunstan's, an irreplaceable public asset that we can do so much with. I would love to see a restored Custom House once again open to the public, following the lead of Somerset House or the Southbank pavilion: a truly community-focused space that is for everyone in the city, a place to socialise, relax and learn. Please don't throw this opportunity away.

Do let me know if I can do anything else to help the development of Custom House. If there is to be a People's Hearing or similar regarding Custom House please do add me to a mailing list or a discussion group and I would be more than happy to give my opinion.

Best wishes and looking forward to hearing from you.

Jon Petre

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

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

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mr michael hadfield

Address: rosemary lane Rosemary Lane Petworth

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Such a glorious Georgian Building should be maintained and kept to enhance the river Thames frontage for everyone

The Old Rectory,
Saxthorpe,
Norwich,
NR11 7BJ

16th February 2021

Sonia Williamson,
City of London

Planning application 20/00632/LBC
20/00631/FULMAJ

Customs House

Dear Sonia Williamson,

The proposals for Smirke's Custom's House are a matter of deep concern. This is not only a building of outstanding interest and importance, but it occupies an exceptionally prominent site.

My concerns are:

- the proposed bars on the roof will compromise the main elevation, particularly at night
- the interiors, including the Georgian offices, deserve rigorous protection
- the plans for the building should allow for a degree of general public, as opposed to exclusive, access.

It should be possible to improve the plans, to deal with these aspects far more sympathetically.

Yours faithfully,

Merlin Waterson, CBE, FSA

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: Planning Applications 20/00632/LBC and 20/00631/FULMAJ
Date: 16 February 2021 16:09:20

From: Sue Mayer
Sent: 16 February 2021 16:03
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

I am writing to object to the plans for this Grade 1 listed Customs House.

I understand the Georgian offices are unique so they should be preserved. I would not like to see the long room carved up.

Adding light pavilions to the roof will not be in keeping with the exterior of the building and will look awful.

This building is part of our heritage and as such should be used in a sympathetic way which we can all enjoy, not just the rich visitors who would stay in an expensive and exclusive hotel.

I am very depressed at the number of historical buildings that have been lost for ever in London. Please don't destroy our history.

I am sure this building could be used as a museum highlighting our importance in trade as after all this was a customs house.. It could also be used by the community. It just needs a bit of creative thought. Turning it into an exclusive hotel shows a lack of thought and is clearly just about making money.

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

Susan Mayer
81, Warburton Road, Poole, Dorset, BH17 8SD

From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: OBJECTION
Date: 17 February 2021 08:55:59

From: Jennifer Newbold <>
Sent: 16 February 2021 22:01
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

16 February 2021

City of London Corporation
Guildhall, London
OBJECTION

Dear Honourable Members,

I am writing in objection to the scheme proposed by Planning Applications 20/00632/LBC and 20/00631/FULMAJ for the Custom House development.

Yet another financially driven, culturally insensitive proposal. London already has a number of Thames-fronted luxury hotels in which I cannot afford to stay. In the vicinity are the Savoy, Royal Horseguards, Rosewood, L'Oscar and the Four Seasons, amongst others. The Custom House deserves a better fate than to be made yet another exclusive haunt of the elite. This proposal is insulting, and will do irreversible damage to the integrity of this distinguished Grade I historic building.

The developers propose to destroy suites of Georgian offices that could, and should be, preserved. They propose to mar the appearance of the building with jarringly unsympathetic roof bars. Furthermore, the proposal contradicts policy as stated in the City Plan 2036, which aims to open heritage spaces to a wider demographic.

I wholly support the alternative proposal offered by SAVE Britain's Heritage. It would allow this structure to be reopened for public use, as was its original purpose. It offers a multi-use, sensitive conversion that takes into consideration the interior integrity of the building. It provides democratic access and offers multiple options to appeal to a wide range of persons, be they tourists, historians, gallery visitors, shoppers, or restaurant-goers. The business-hub portion of the proposal alone is brilliant, opening access to small- and independent business owners whilst preserving the surviving Georgian office suites. What I wouldn't give for a pop-up office in the Custom House!

I urge you to reject Planning Applications 20/00632/LBC and 20/00631/FULMAJ.

Respectfully yours,

Jennifer Newbold
124 Hillcrest Road
Concord, MA 01742
USA

Begum, Shupi

From: Patricia Wilkey [REDACTED]
Sent: 17 February 2021 16:08
To: PLN - Comments
Subject: RE: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear William,

So sorry, my address is noted below.

21 Winter Folly
Laindon
Basildon
Essex
SS15 5GL

Kindest regards,

Pat Wilkey

[Sent from Yahoo Mail on Android](#)

On Wed, 17 Feb 2021 at 12:18, PLN - Comments
<PLNComments@cityoflondon.gov.uk> wrote:

Dear Patricia,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

regards,

William Adjei

From: Patricia Wilkey [REDACTED]
Sent: 16 February 2021 17:20
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: OBJECTION - Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams,

I would like to lodge my objection to the above noted proposed redevelopment of The Custom House.

I was under the impression that the City of London was against exactly this kind of exclusivity, the kind a luxury hotel development of this sort offers.

The City Plan 2036 is being contradicted here in my opinion. The development will destroy the Georgian office suites that are a unique and very rare survival and the pavilion light boxes which will be used as rooftop bars will absolutely compromise the principal frontage.

I do hope that you make note of my objection and I thank you for your time in doing so.

Kindest regards,

Pat Wilkey

[Sent from Yahoo Mail for iPad](#)

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Begum, Shupi

From: Williams, Sonia
Sent: 18 February 2021 08:40
To: PLN - Comments
Subject: FW: OBJECTION to planning app 20/00631/LBC & 20/00632/FULMA

Please download to 20/00631/FULMAJ and 00632/LBC and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: alun_watkins2003 [REDACTED]
Sent: 17 February 2021 16:45
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Subject: OBJECTION to planning app 20/00631/LBC & 20/00632/FULMA

OBJECTION

Dear Ms Williams

I would like to register an objection in the strongest possible way to the planning application to convert the UK's most famous Custom House into a luxury hotel.

Custom House is an iconic building and sits on the same prime Thames side site

That has been occupied for many centuries by a Custom House. It is a Grade 1 listed building of huge cultural significance and the plan to give it to a private company registered in a tax haven is an insult to the British population.

This building must be saved from destruction and returned as a space for the British public to utilise and enjoy. Having worked in this building for 30 plus years it is inconceivable that it can be sympathetically converted into a hotel; that this is to be done in the name of profit for an offshore tax haven based company is abhorrent.

This magnificent building belongs to the British people and it should be conserved as such. It should never have been leased to an offshore entity many years ago and an equity should also be launched into this potentially corrupt action.

Custom House would provide a prime site for a museum or gallery, and also provide valuable public space much like how Somerset House and Tate Modern have been similarly converted in the past.

Regards
Alun Watkins
326 Richmond Rd
Kingston Upon Thames
KT2 5PP

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

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

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Dr James Emerson

Address: 141 Blackheath Park London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The building is a significant (national) historical and cultural asset, which should have been treated more sensitively by this application. In particular the external appearance, the main hall and the Georgian offices are all very worthy of preservation in essentially their current form. Because this application will damage all these it should not be approved.

Begum, Shupi

From: Michael Hahn [REDACTED]
Sent: 18 February 2021 23:57
To: PLN - Comments
Subject: Subject: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Planning committee

I've been made aware of the planned redevelopment of the Custom House building without any apparent thought being given to its historic or characteristic existing features. The sole objective by the off shore owners to create another 'new' hotel without respect for the history of London. I feel that either sufficient guarantees are received to incorporate key original features or the planning permission be refused.

Thank you

Michael Hahn

7 Manor Park Gardens
Edgware
HA8 7NB

Tel: [REDACTED]

Begum, Shupi

From: Williams, Sonia
Sent: 19 February 2021 12:40
To: PLN - Comments
Subject: FW: Objection: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

Please download to 20/00631/FULMAJ and 00632/LBC and acknowledge

Thanks

Sonia

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Richard Kirker [REDACTED]
Sent: 18 February 2021 23:29
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection: Planning Applications 20/00632/LBC and 20/00631/FULMAJ

OBJECTION

I am not persuaded that this plan merits planning approval.

The exemplary nature of this elegant and imposing Grade 1 building, its history, and iconic location should be put at the disposal of all Londoners and its visitors.

Much as Tate Modern and Somerset House have been converted into major public cultural attractions, to great acclaim, this building deserves a more noble fate than to become another and superfluous luxury hotel.

As a publicly owned building redevelopment costs would not include land or building purchase making the project financially feasible, with significant income generation potential from visitors and events/exhibitions.

The plans are an unsympathetic conversion which would be destructive to the fabric of the grade I listed building, erasing its meaning and significance. In particular, suites of Georgian offices which are a unique survival will be destroyed and two unsightly two light-box bars added to the roof, weakening the aesthetic appeal of the river frontage.

Richard Kirker
10 Coopers Close
LONDON
E1 4BB

Begum, Shupi

From: Williams, Sonia
Sent: 18 February 2021 08:39
To: PLN - Comments
Subject: FW: OBJECTION

Please download to the 2 applications referenced and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises?
Complete our short form to request temporary vinyl signage

From: jlk1972 [REDACTED]
Sent: 18 February 2021 08:36
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

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

PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Madam and Sir,

I am writing to record my objection to the requested unsympathetic and destructive conversion of this listed Grade I historic building into a luxury hotel when it should be put back to public use for all Londoners.

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

Yours sincerely,

Julian Kirkby
23 Sherwood Avenue
London
E18 1PB

Begum, Shupi

From: Williams, Sonia
Sent: 18 February 2021 18:33
To: PLN - Comments
Subject: FW: OBJECTION 20/00632/LBC and 20/00631/FULMAJ

Please download to both apps and acknowledge

Thanks

Sonia Williams
Principal Planning Officer
Department of the Built Environment
020 7332 1763
07810 813442
www.cityoflondon.gov.uk



Does your business need on-street signage to help your visitors follow safe social distancing when queueing outside your premises? Complete our short form to request temporary vinyl signage

From: Stephanie Lawrence [REDACTED]
Sent: 18 February 2021 18:29
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: OBJECTION 20/00632/LBC and 20/00631/FULMAJ

Dear Ms Williams and Mr Moss,

I would like to strongly object to the proposed plan to turn Customs House into a luxury hotel with bars on the roof - planning applications 20/00632/LBC and 20/00631/FULMAJ.

I was lucky enough to visit Customs House on one of the Open London weekends and it is a stunning building with Georgian suites of offices that I understand would be removed in the development. With so few Georgian suites of offices even remaining that simply cannot be allowed. It is a beautiful place that deserves preservation and admiration in its current form.

I work in St George's hospital and, as I'm sure you can imagine, this year has been the most challenging of my career and continues to be so. When there is the opportunity, I will need time to stop and recuperate. Beautiful buildings and history are two things that bring me peace and healing, and I'm sure I cannot be alone in that. My NHS salary is insufficient to afford luxury hotels in London, such as the proposal for Customs House. Thus if it is turned into one, I am excluded from yet another building in London due to financial limitations and I am absolutely certain that I am not alone in that either.

It is my understanding that such a development is not even permitted as it contradicts the City of London's policy outlined in the City Plan 2036, whereby preference is given to office-led cultural use. Opening this building up to the public in the manner stipulated in the City Plan 2036 would enable someone like myself to visit there.

We are fighting the biggest medical fight of our time, I am fighting the biggest personal fight of my time. Please do not permit it to happen that I emerge from this fight to find myself excluded from yet another part of the city that I have worked tirelessly to help.

Please deny the proposal for a hotel in Customs House.

With kindest regards and hope of a positive outcome,
Stephanie Lawrence

44 Chester Close, Pixham, RH4 1PP

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Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

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

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Rosemary Baird Andreae

Address: 13 Pelham Place London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I like the idea that the Customs House should be restored and repurposed but am nervous about it becoming a hotel, with inevitable compromise to the historic interiors. The West wing should not be so sub-divided and original fabric will be lost. There should be public access to the historically interesting Long Room. The glazed pavilions on the roof are not a visually satisfactory solution. This is a great opportunity but needs a more public-facing solution, as at Somerset House or Greenwich.

Begum, Shupi

From: Hope, Ruth (PUT) Staff [REDACTED]
Sent: 19 February 2021 10:15
To: PLN - Comments
Subject: Objection regarding the Customs House

Dear William

Thank you for flagging up that you need my details. Apologies for not providing my address.

It is
97 Claverdale Road
London
Sw22dh

Please let me know if you need anything further.

Kind regards
Ruth Hope

Sent from my iPad

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Begum, Shupi

From: Adjei, William
Sent: 19 February 2021 09:37
To: Hope, Ruth (PUT) Staff
Cc: Williams, Sonia
Subject: RE: Objection

Dear Ruth ,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

regards,

William Adjei

From: Hope, Ruth (PUT) Staff [REDACTED]
Sent: 14 February 2021 10:03
To: Williams, Sonia <Sonia.Williams@cityoflondon.gov.uk>
Cc: Moss, Alastair <Alastair.Moss@cityoflondon.gov.uk>
Subject: Objection

Planning Applications 20/00632/LBC and 20/00631/FULMAJ PROPOSED REDEVELOPMENT OF THE CUSTOMS HOUSE

Dear Sonia Williams

I am writing in strong objection to the proposed redevelopment of the Customs House.

This building should be put back to public use for all Londoners, and London really is not short of luxury hotels so this idea should be rejected. This Grade I listed building could be redeveloped in the same way that for example Tate Modern has been. There are other examples of sympathetic redevelopments, and the proposed luxury hotel is not sympathetic or inclusive.

In addition,

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

I strongly object and I know many others will do too.
Sincerely
Ruth Hope

Sent from my iPad

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From: [Williams, Sonia](#)
To: [PLN - Comments](#)
Subject: FW: Objection to planning application 20/00632/LBC20/00631FULMAJ
Date: 04 March 2021 12:20:26

Dear Ms Williams,

I am writing to object to the proposed conversion of the Customs House into a hotel. This is an unsympathetic and destructive conversion which would dramatically change the Grade 1 listed buildings appearance on the outside as well as destroying a suite of Georgian rooms inside. This is London's historical heritage and we lose it at our peril.

Londoner's and visitors to London should be able to use and enjoy this historical space.

Please reject this application and support applications that put restoration, preservation and Londoners at the heart of their application. Benefiting us all.

Yours sincerely
Catherine Hopkin
31 Camp Road
St Albans
Herts
AL1 5DX

Ms Sonia Williams
Department of the Built Environment
City of London Corporation

Our Ref: 19/00116/FULL

Your Ref: 20/00631/FULMAJ

Date: 22 March 2021

By email only:
sonia.williams@cityoflondon.gov.uk

Dear Ms Williams

**Objection to Planning Application 20/00631/FULMAJ & 20/00632/LBC
Custom House – Proposed Change of Use from Office to Hotel-led Mixed Use Development**

We act for Tony Matharu, Chairman of Integrity International Group and former Managing Director of Grange Hotels. It should be noted that our client has no interest, or connection with the application.

Our client does have a long and distinguished track record of investment in London and, while he is highly supportive in principle of the refurbishment of Custom House, cannot support the current application.

The proposals are in material conflict with the aims of local and national planning policy, and fail to protect and promote both this valuable heritage asset, and the exceptional importance of the office-led area around it. The City is urged to refuse the application for the reasons set out below.

1. Loss of Office Space

1.1. All adopted and emerging local and national planning policies relevant to this site are heavily weighted towards the protection of office-led use, chiefly (our emphases):

1.1.1. Policy DM 1.1 of the City of London Local Plan 2015: *"To refuse the loss of existing (B1) office accommodation to other uses where the building **or its site** is considered to be suitable for **long-term** viable office use"* and paragraph 3.1.10: *"The **riverside** is an attractive location for offices and office-led commercial mixed use development"*

1.1.2. Policy DM 11.3 of the City of London Local Plan 2015: *"Proposals for new hotel and apart-hotel accommodation will only be permitted where they: • do not prejudice the primary business function of the City; • are not contrary to policy DM1.1;*

1.1.3. Strategic Policy S18 of the Draft City Plan 2036: *"The Pool of London Key Area of Change will be regenerated through...1. Enabling **office-led** redevelopment or refurbishment of the existing building stock, including the provision of retail, cultural and leisure uses*

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*which are complementary to, and **do not detract from, the primary business function of the City.***"

1.1.4. Policy SD4 of the London Plan 2021: "B. The **nationally and internationally significant office functions** of the CAZ should be **supported and enhanced** by all stakeholders, including the **intensification** and provision of sufficient space to meet demand for a **range of types** and sizes of occupier and rental values."

1.2. Policy SD4 of the London Plan 2021: "*Residential or mixed-use development proposals should **not lead to a net loss of office** floorspace in any part of the CAZ unless there is no reasonable and **demonstrable** prospect of the site being used for offices. To achieve this, alternative **provision of equivalent or net additional** office space can be made (including through swaps and credits – see Part H below). This should be within the CAZ and near the development*"

1.3. The policy presumption is therefore a difficult one to rebut, but clearly it has not been sufficiently rebutted in this case:

1.3.1. the Viability Assessment submitted with the application purports to have determined that *no* viable options existing for any continued office use, and that the *only* viable use is that of a hotel. This somewhat beggars belief given the site's current use and location;

1.3.2. the City of London's Chair of the Planning and Transport Committee reported on 9 March 2021¹ that "*so far this year, it has given planning consent for the equivalent of almost 80% of the total office floorspace it approved for the whole of last year; demonstrating the City office market remains resilient despite new ways of working being adopted throughout the coronavirus pandemic.*";

1.3.3. it cannot be said that there is no demonstrable prospect of continued use as office-led development when no attempt has been made to market an office-led alternative;

1.3.4. the proposal contains *no element of office use* and no alternative provision of equivalent or net additional space as required by Policy SD4.

2. Public Benefits

2.1. It is acknowledged that Historic England's view is that harm to the listed building would be likely to be 'less than substantial', engaging the test under paragraph 196 of the NPPF to weigh the harm against the public benefits of the proposal.

2.2. It is with respect to the weighting of those public benefits that the application is misguided and inadequate.

¹ <https://news.cityoflondon.gov.uk/city-office-floorspace-surges-as-developers-back-the-square-miles-future/>

- 2.3. At first glance, the proposals will open up the riverfront, give access to the interior of the building and remove the parking.
- 2.4. However, on closer scrutiny, the terms on which it is proposed to afford public access are heavily constrained and entirely within the discretion of the operator. For example, the draft heads of terms for the section 106 agreement provide that:
 - 2.4.1. Public access to the hotel foyer on the ground floor is only open from 11am to 6pm on normal trading days (subject to frequent closure for events;
 - 2.4.2. Further access is by prior booking only, and then also at the owner's discretion;
 - 2.4.3. Public tours will only be available once per months and by prior booking;
 - 2.4.4. Public access to the quayside will be subject to operating times of the hotel – and the owner has complete discretion to close it at any time and for any purpose;
 - 2.4.5. The owner specifically negates the creation of any public rights of way over the quayside area.
- 2.5. When viewed in the context of the intention to operate a large number of events (public and private), these restrictions on accessibility and enjoyment of the proposed development further diminish any public benefits.
- 2.6. Particularly with respect to the heavily caveated access to the quayside, it is clear that the benefits fall far short of outweighing the 'less than substantial harm'.
- 2.7. Another key concern is that the current commitment to these measures through the draft heads of terms only extends to 5 years and makes no commitment after that.
- 2.8. Compare this for example to The Ned, where there is extensive public access to a large indoor dining area, and to 55 Broadway, where public access is in perpetuity.

3. Thames Riverside – Activation of the River Front

- 3.1. A much-touted benefit of the proposal is the public realm and access to be provided on the river frontage. However as explained above, the result of the restrictions on access to the quayside public realm area effectively mean that it cannot truly be considered a 'public benefit'.
- 3.2. The London Plan 2021 at paragraph 9.16.5 refers to the Mayor's 'Case for a River Thames Cultural Vision' and clearly aims to increase engagement of Londoners with the river.
- 3.3. The London Plan 2021 at paragraph 9.16.4 also refers to the importance of London's waterways for walking routes, health and well-being and linkages to transport.

- 3.4. If the quayside public realm were truly a public benefit of the proposal, public access would connect with and continue the river paths either side of it, and ensure free access and public right of way at all times, such as the nearby route along the frontage of Riverbank House and the Nomura building at Swan Lane.

4. Urban Greening Factor

- 4.1. Adopted Policy G5 of the London Plan confirms that all major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. It confirms that predominately commercial developments, such as Custom House, should target a UGF score of 0.3.
- 4.2. The current proposals for Custom House proposed an UGF score of 0.08, which falls short of this target by 0.22. The project ecological consultant, Olivia Guindon from Greenage, even acknowledges in her January 2021 letter that other solutions to increase the UGF score are available including more planting as well as vertical greening on suitable elevations of the building.
- 4.3. This should be considered and explored further prior to the determination of the planning application given the current low level of UGF proposed. The proposal is not policy-compliant in this respect, particularly given its position next to the River Thames and the proposed riverfront public open space proposed.

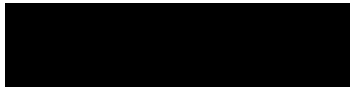
5. Employment and Training

- 5.1. Adopted Policy E11 of the London Plan emphasises the need for strategic development proposals to support local employment, skills development and training opportunities.
- 5.2. Policy GG1 of the London Plan good growth objective clearly states that everyone should benefit from economic opportunities in London to ensure a fairer and more equal city. In these terms, the GLA in their Stage 1 report have sought a recruitment and training strategy, or an alternative approach, that demonstrates how the development would provide training and employment opportunities during the lifetime of the development, which should be secured through planning conditions or legal agreement. I
- 5.3. No such details appear to have been made available, but in light of the total loss of office space this obligation takes on a greater significance, and is necessary in order to partially offset some of the detraction of the proposed use from the primary business function of the City.
- 5.4. It is therefore a highly material and relevant that these details are not left for later submission via section 106 obligations, and that they are fully considered prior to determination of the application.

6. Conclusions

- 6.1. Far from recognising the nationally and internationally significant office function of the City, the proposal detracts from the primary business function of the City and leads to a net loss of office floorspace.
- 6.2. The application contains no element of office use and no alternative provision of equivalent or net additional space as required by Policy SD4 of the London Plan 2021.
- 6.3. The proposals for providing and securing public access fall far short of that required to meet the level of benefit require to outweigh the 'less than substantial harm'.
- 6.4. The loss of office space, together with the severely limited opportunities for public access and enjoyment, would result in a use that effectively isolates this historic building from commercial or cultural integration with the Thames, London and Londoners.
- 6.5. The harm occasioned by the loss of office space, and the lack of full permanent public access to the quayside, cannot be outweighed by the minimal public benefits of this scheme.
- 6.6. The policy non-compliance of this application, coupled with the inadequate supporting information and public access proposals, are fatal to this scheme, and it should be refused.

Yours faithfully

A solid black rectangular box used to redact the signature of Davitt Jones Bould.

Davitt Jones Bould

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

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

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mr Andrew Wells

Address: Brookside Cottage, Mill Lane Corston Malmesbury

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Dear Ms Williams

As a former director of a company owning a unique small Grade I building of 1780, near the Custom House and open by appointment to the public, I object to the proposals to convert the Custom House. The external integrity of this important Grade I building, the creation of Laing and Smirke two of the leading architects of their day, will be badly compromised. I will not go into detail since this has already been covered extensively by many other objectors, and particularly by

SAVE and the Georgian Group, which I support wholeheartedly.

There is less and less evidence along the riverfront of the heyday of London as a great international port and centre of the shipbuilding industry from the 16th to the 19th centuries. What remains is being dwarfed and largely eclipsed by the tall office buildings and luxury and other extensive housing developments of recent decades. I will only emphasise a few of my concerns. The Custom House is a cultural and historic beacon on the north bank and I consider its exterior should not be altered as proposed, especially with the addition of unsympathetic glazed pavilions on the roofs of the two wings. No justification is made for any benefit these would add from an architectural or historic point of view. While I agree that the riverside terrace proposals are an improvement as a space to be enjoyed by the public, there is no convincing evidence that the building itself will be available for the broad education and enjoyment of visitors. The internal proposals will largely obliterate the grandeur of the early 19th-century design which has survived through various changes of use since it was built.

The Custom House has outlived two world wars, despite the blitz damage, and many more recent buildings in the City. I would encourage the Corporation to re-examine the proposals to ensure that it remains a monument to a period in history on which so much of the City of London's success is based.

Yours sincerely

Andrew Wells

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

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

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mrs Sarah Lambirth

Address: 32 Long Street Devizes Devizes

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Desecration of an important piece of architectural history. Quite shocking that such vandalism could be even contemplated. Enough hotels in London already and better if they are purpose built in the outskirts rather than wrecking existing buildings. The removal of war memorials is also a very sad idea which runs counter to all common sense and decency.

Some other use should be found for this building which does not sacrifice its character. If it could be done with Somerset House, then it can be done here.

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

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

Proposal: External and internal works associated with the partial demolition, alteration, extension and conversion of Custom House from office (Use Class E) to a hotel (Use Class C1) with flexible retail floorspace (Use Classes E and Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm including: External works: i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bars with terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and ramped access across Centre, and parts of West and East Block (south elevation); iv.) alterations to and raising of the flood defence wall; v) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; alterations to service ramp; hard and soft landscaping. Internal works: i) roofing over, partial demolition and reconfiguration of West Block courtyard, to include new service core and other works; ii) removal of HMRC War Memorials; iii) demolition and alteration of existing walls and ceilings and erection of new across all floors in the West and Centre Blocks to accommodate hotel bedrooms and associated facilities.

Case Officer: Sonia Williams

Customer Details

Name: Mr Andrew Lambirth

Address: 32 Long Street Devizes

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This great building deserves to be preserved as part of our cultural heritage with rights of public access. It used to contain a Smuggling Museum and the public could visit the principal rooms of the Custom House. This should be possible again. Why must a splendid building such as this be reduced to a crass commercial statement in the form of a hotel and lose its historic identity and even the integrity of its river facade? It is also essential that access is made once again possible to the building's river terrace that traditionally has been such a popular feature. Why

cannot this important building become a treasured part of the cultural fabric of our capital city, used for a variety of purposes, its celebrated architecture and fabric treated with proper respect? London needs its fine buildings and the Custom House is clearly a great resource. It should be treated as such and cherished.

From: [William, Joane](#)
To: [Joane, Joane](#)
Subject: FW: OBJECTION
Date: 06 April 2021 15:16:05

-----Original Message-----
From: joane.greene
Sent: 06 April 2021 17:42
To: William, Joane <Joane.Williams@cityoflondon.gov.uk>
Cc: Moss, Alanar <Alanar.Moss@cityoflondon.gov.uk>
Subject: OBJECTION

Dear Ms Williams,

Re: Planning Applications 201900324,BC and 20190631(PULMA)

I would like to register my objections to the proposed redevelopment of Custom House, Lower Thames Street, EC3R 6EE.

It is a building of national historic significance and should be sympathetically restored and put back to public use for all Londoners.

Having worked in Somerset House and lately Custom House, I have seen first hand what can be done with a national historic building converted for public use.

I urge you to consider an alternative proposal.

Yours sincerely,

Joanne Greene
16, Berkeley Close, Abbots Langley, Hertfordshire, WD5 0XA

Begum, Shupi

From: Ed Worthy [REDACTED]
Sent: 09 October 2020 11:56
To: PLN - Comments
Subject: Custom House

Reference: [20/00631](#)/FULMAJ;
[20/00632](#)/LBC:

I live around the corner from this development and have just seen the planning application for Custom House. My main concern is accessibility to local residents. It only seems to have the front area as public, whereas the hotel and rooftop seem to be private. Who is submitting the application? This is at the bottom of my road so I'm concerned about it being done improperly.

My address is Flat 23, 31 Monument Street, EC3R 8BT.

Kind regards,

Edward Worthy

From: [Edward Worthy](#)
To: [PLN - Comments](#)
Subject: Re: Application Consultation (20/00632/LBC)
Date: 13 July 2021 12:18:07

THIS IS AN EXTERNAL EMAIL

This looks good to me, I withdraw any prior objections I had and am in support of this development.

Kind regards,

Edward Worthy

On Tue, 13 Jul 2021 at 12:13, <PLNComments@cityoflondon.gov.uk> wrote:

Dear Sir/Madam

Please see attached consultation letter for planning application 20/00632/LBC (Custom House [20 Lower Thames Street](#) & River Wall, Stairs And Crane, Custom House Quay London EC3R 6EE).

Kind Regards

Planning Administration
Department of the Built Environment
City of London

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Website: <http://www.cityoflondon.gov.uk>

Ms Sonia Williams
Department of the Built Environment
City of London Corporation

Our Ref: 11935.00001/YPW

Your Ref: 20/00631/FULMAJ & 20/00632/LBCJ

Date: 2 August 2021

By email only:
sonia.williams@cityoflondon.gov.uk

Dear Ms Williams

**Objection to Planning Application 20/00631/FULMAJ & 20/00632/LBC – Representations on Updated Application Material
Custom House – Proposed Change of Use from Office to Hotel-led Mixed Use Development**

We act for Tony Matharu, Chairman of Integrity International Group and former Managing Director of Grange Hotels. He remains a director of Globalgrange Ltd, the parent company of the brand Grange Hotels.

It should be noted that our client has no interest, or connection with the application, despite the apparent attempts to relate Grange Hotels or Globalgrange Ltd - and derivatives of the same - to GEM London, by the use of the name Globalgrange Hotels Limited by one of the Applicants. We note that name has since been changed to Globalgem Hotels Limited. The distinction is significant for reasons that will become clear below.

This representation is in response to additional material that has been submitted by the Applicant, and two changes to the proposed development:

1. A new “museum” in the ground floor of the original western wing with a café -this is effectively a café and not a museum;
2. Amendment of the Cultural and Community Strategy, developed with the operator, GEM Hotels, detailing measures to preserve and promote the historical significance of Custom House.

Our client upholds his objection to the application on the basis that the further measures proposed still do not remedy the material conflicts with the aims of local and national planning policy.

Further, the additions of the museum and revised Cultural and Community Strategy above fall short of adequately protecting and promoting this valuable heritage asset, and their operation and maintenance will be delegated to an inexperienced operator (GEM) without absolutely no track record of safeguarding cultural heritage.

1. Museum

- 1.1. The addition of the museum was only at the request of the City – clearly indicating that the application had failed to properly appreciate and protect the cultural and historical significance of this building and its local area.
- 1.2. The museum proposal, (while a welcome feature), appears to be a cosmetic change only. Because of the lack of detail regarding its content, operation and maintenance, it is essentially a café, described as a ‘museum with café’. The revised Cultural and Community Strategy dated May 2021 dedicates 5 pages to the purported museum, 2 of which are entirely images, and is insufficiently detailed to give any clarity or certainty about delivery of the museum, or the standard to which it must be delivered.
- 1.3. This feature is too critical to the impact on this listed building to be left to negotiation in the section 106 agreement. Yet the most important elements of the proposals are left to be deferred to later stages away from the scrutiny of public consultation. For example, in order to be acceptable in planning terms the Strategy should clearly state:
 - 1.3.1. The criteria for the selection of the ‘Heritage Partner’, such as demonstrable experience of a similar project and track-record of delivery;
 - 1.3.2. A timeframe within which the museum must be established and a restriction on occupancy of the hotel until the museum is operational to the satisfaction of the City;
 - 1.3.3. Details of monitoring, enforcement and accountability measures;
 - 1.3.4. Method for securing the delivery of the museum in perpetuity, such as restrictive covenant;
 - 1.3.5. Binding operational obligations to provide the museum as a museum and not a café – and to guarantee its primary use as a museum open to the public free of charge to be upheld at all times.
- 1.4. The Draft Heads of Terms of the Section 106 Agreement have not been updated to reflect the revised Strategy, and therefore the obligation with respect to the Strategy remains as:

“No later than three (3) months before the projected Opening Date, to submit a Culture and Community Strategy for approval by the City (such approval not to be unreasonably withheld or delayed).”
- 1.5. There is nothing in this obligation which binds the Applicant to submit the May 2021 Strategy, and therefore it is entirely possible that the version which is submitted for approval under the Section 106 Agreement may not even contain the museum proposal at all.
- 1.6. The museum is clearly a critical addition to the development in order preserve the cultural and historic significance of the building, or it would not have been required by the City.
- 1.7. Now, having required it, the City and the Applicant have a duty to see that the museum will be delivered, and maintained, throughout the life of the development. In the absence of better security of that compliance, the obligation to provide the museum is manifestly unfit for purpose.

- 1.8. The Catch-22 of the museum however, is the impact that it will have on the viability of the project. The application is trying to have its cake and eat it. The Viability Assessment Addendum Part 1A dated June 2021 concludes at page 18 that (emphasis added):

*“The City requested that a museum be incorporated into the ground floor of the hotel scheme and on the basis that there was a positive margin between the hotel scheme and the Benchmark, the applicant has now included a museum to the north west of the Western wing of the building. This scheme has now been submitted as an amendment to the application scheme. The appraisal of this scheme shows that the inclusion of a museum, requiring the loss of 4 hotel bedrooms and the inclusion of an additional lift, **depresses the value of the application scheme to a level just above the Benchmark Land Value**, concluding that the amended application scheme is viable. **There is however little margin between the amended application scheme and the Benchmark Land Value** which confirms that the museum space provided in the ‘amended planning application scheme’ is the largest space that can be viably offered as part of the hotel scheme.”*

- 1.9. With such tight margins on viability with the museum included in the scheme there is clearly a risk that this is an obligation that could be revised in the future should the operator decide it is impacting on viability.
- 1.10. An operator which is inexperienced in providing this niche facility (such as the newly incorporated GEM) is unlikely to be able to balance this fine margin, which would lead to an unacceptable risk to the delivery of the heritage benefits of the proposals, if they are in fact a true long term intention and properly secured as such by the Section 106 Agreement.
- 1.11. It is therefore essential that the application demonstrates robust measures to guarantee and safeguard the deliverability of the museum and ensure it is not ‘sacrificed’ for viability reasons. However it clearly cannot be established that the development is viable with comfortable margins with the inclusion of the museum and therefore the application should be refused for lack of deliverability of this vital feature.

2. Cultural and Community Strategy

- 2.1. The Cultural and Community Strategy is a high-level, aspirational outline of general measures. It is a re-packaging of previous information, with the addition of the museum section. It still falls very significantly short of the level of detail that should be demonstrated for the preservation and protection of a listed building of this significance and in this location.
- 2.2. The safeguarding of public access and restoration of active frontage on the Thames is essential to delivering the public benefits that are required by Historic England, but the same very significant shortcomings of the application persist in this regard and have not been addressed by the Cultural and Community Strategy – it is still very heavily caveated with the potential for severe and discretionary restrictions on accessibility and enjoyment of the proposed development by members of the public.
- 2.3. In this context, where so many of the measures for cultural heritage and public access protection cascade down to the operator, the credibility and identity of the operator is an important factor in ensuring the objectives of the Strategy will be delivered properly.
- 2.4. The Statement of Community Engagement dated May 2021 noted that the identity of the hotel operator was a recurrent query of participants in the consultation. However, the proposals still do not provide adequate detail about the experience, track record and accountability of the currently selected operator, GEM, the identity of which is opaque. The

pre-application consultation process therefore appears to have been misleading at best because nothing more than statements of assurance have been provided to support the assertion that the operator is appropriately resourced and experienced. Insufficient information was provided to participants in this regard and therefore they were not able to give meaningful feedback on the museum proposals and how it would be operated.

- 2.5. In addition, GEM has no interest in the application land, and therefore does not need to be a party to the section 106 agreement. All of the measures with respect to the museum, public access and future use are supposed to be enforced by them, but there is a clear gap for the City in the chain of enforcement between the owner and the operator if the operator is not a party, irrespective of the credibility and identity of that party. As mentioned above, the Draft Heads of Terms for the Section 106 Agreement currently do not even have the effect of mandating the inclusion of the museum in the ultimate Strategy that is presented to the City for approval.
- 2.6. GEM is also meant to be responsible, via the funding of a Culture and Community Events Officer ("CCE Officer"), for the monitoring (section 6.4) and annual reporting (section 6.5) of the Cultural and Community Strategy.
- 2.7. The Draft Section 106 Heads of Terms require that the CCE Officer prepare and submit annual reports to a Culture and Community Committee. However the contents of the report (as stipulated by the Draft Heads of Terms) are effectively just a tally of events that have been held in the preceding 12 months.
- 2.8. The annual report of the CCE Officer is not required to contain any qualitative or quantitative targets for types of events or visitor numbers, there are no outcomes or performance measures, and there are no sanctions for under-utilisation, simply the ability for the Committee to "recommend to the Owner (from time to time) changes to the approved Culture and Community Strategy that it reasonably considers would enhance achievement of the Objectives".
- 2.9. The Draft Heads of Terms have also not been updated to reflect the inclusion of the museum and therefore there is no requirement to include monitoring or reporting on it in the annual report.
- 2.10. Finally, the Draft Section 106 Heads of Terms only require the Culture and Community Committee to be constituted for **5 years** from the date it is first established. In addition, it is only first established if the first meeting is quorate – and there is no mechanism which compels the Applicant to actually hold the first meeting.
- 2.11. Assuming the Committee is ever established, the CCE Officer will essentially be unaccountable after five years.
- 2.12. Moreover, and very importantly, by the Applicant's own admission the CCE Officer will only be part of a large events team. That is: the proposed scheme is including a café and events spaces, whereby the 'Museum' is merely an integral part of the hotel's food and beverage operations as a café, and the events management, responsible for private, managed business and informal events as stated will be in reality be in control of the hotel's large events team. Events and use of this entire accommodation, including on request "pre-arranged" tours will be at the "Hotel Manager's discretion". The operator, via the CCE Officer, will be unaccountable for this change of use after 5 years. This is far from the guarantees promised.

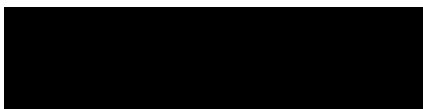
- 2.13. When viewed in the context of the vague and temporary Section 106 obligations, it becomes apparent that the Culture and Community Strategy is entirely without teeth or substance. The application cannot satisfy planning policy requirements to protect, preserve and promote the cultural and historic significance of the building.

3. Other Grounds of Objection

The further submissions make no attempt to address the other material planning consideration which weigh against the proposals, and which should, on balance, be viewed together with the above as an overall failure of the development to demonstrate this it is acceptable in planning terms:

- 3.1. Loss of office space - no element of office use and no alternative provision of equivalent or net additional space as required by Policy SD4. The current desire is for cellular structure offices with windows and natural ventilation – exactly what Custom House provides;
- 3.2. Lack of security and certainty of delivery of public benefits by the opaque operator;
- 3.3. Failure to provide free access and public right of way along the riverfront at all times, such as the nearby route along the frontage of Riverbank House and the Nomura building at Swan Lane. Leaving such important and fundamental matters to the hotel manager's discretion – is not acceptable;
- 3.4. Failure to guarantee or to contribute to the greening of London by including urban greening as a fundamental element of site and building design, particularly in the context of the July 2021 revisions to the National Planning Policy Framework;
- 3.5. Failure to provide local employment, skills development and training opportunities in order to partially offset some of the detraction of the proposed use from the primary business function of the City;
- 3.6. Failure to provide for all of these matters in full detail at application stage. These important matters should not be deferred for negotiation via section 106 obligations, and risk their dilution.

Yours faithfully

A solid black rectangular box used to redact the signature of Davitt Jones Bould.

Davitt Jones Bould



To whom it may concern

Re: Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE
Listed Building Consent reference: 20/00632/LBC
Full Planning Permission reference: 20/00631/FULMAJ

We have written previously expressing our objection to the conversion of the Grade I listed Custom House into a hotel. The Custom House is an asset of national importance, and the impacts of any proposed development must be assessed with this in mind.

Together with Somerset House, The Custom House is one of the oldest purpose-built office buildings in the London and as such, should be considered as having the highest significance. Within the West Wing, the proposed changes and creation of hotel rooms and bathrooms will result in the loss of the original layout of the office spaces resulting in significant harm to the building.

The proposed change of use (Use Class E) to a hotel (Use Class C1) will restrict the access of the internal spaces to hotel guests only, for example the Long Room on the first floor, and will not deliver the public benefits that would outweigh the harm or loss to the building. We would maintain that the harm caused to the building by the proposed alterations and its conversion into a hotel will not provide the required substantial public benefits required by Paragraph 202 of the NPPF-July 2021.

Externally, the proposals include the addition of two glazed pavilions which will be visible from the riverside of the building and seriously despoil the external aspect of the building, resulting in substantial harm to the asset. Paragraph 199 of the NPPF-July 2021 applies.

We do not consider that the proposals for managed public access to the terrace meet the objectives of the City of London Corporation as outlined in Riverside Walk Enhancement Strategy which proposes that *'the opportunity should be explored to bring the private forecourt entirely or in part (thus retaining some access for servicing) into public use, thus creating a continuous string of spaces for public use from Montague House to Sugar Quay.'*

The Committee remains of the opinion that the applicant has failed to appreciate the significance of the Custom House building as a nationally listed Grade I building in a World Heritage Site setting, as required by Paragraph 206 of the NPPF-July 2021.

Therefore, in view of the requirements of NPPF-July 2021 paragraphs 199 & 202, the Committee requests that Listed Building and Full Planning consents be refused on the grounds of the harm it would cause to this designated historic asset.

We further recommend that the City of London consider the establishment of a public consultation process to reconsider the proposed conversion of Custom House into a hotel and to consider other alternative uses for such an iconic building.

Vicki Fox (Hon. Secretary)

LAMAS – Historic Buildings & Conservation Committee 20 September 2021

Comments for Planning Application 20/00632/LBC

Application Summary

Application Number: 20/00632/LBC

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

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

Case Officer: Jessica Robinson

Customer Details

Name: Miss Eileen Spencer

Address: 63 Broseley Grove Sydenham London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

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

Comments for Planning Application 20/00632/LBC

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Case Officer: Jessica Robinson

Customer Details

Name: Miss Kathleen Spencer

Address: 63 Broseley Grove Sydenham London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

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