

6 Fitznoy Square, London WTF 3DX 020 7529 8920 officor georgiangroup org.uk www.georgiangroup.org.uk

Patron HM King Chailes III.

Vice-Patron The At Rey and Rt Hon. Lond Chartnes GCVC

President. The Duchina of Argyll

Chairman Paul Zioman

Director, David Adshead.

interest of both the Brewery Conservation Area and Chiswell Street Conservation Area as the consistent scale, form and palette of materials are evident. The proposed roof extensions would be contrary to each of these characteristics causing harm to the Brewery Conservation Area and setting of the Chiswell Street Conservation Area.

The views provided within the TVHIA show the impact of the proposed roof extensions on the listed buildings and their setting. This is particularly clear within views 2, 5 and 6 where the setting of the terrace is harmed, and the form of the buildings obscured. View 4 shows the impact the proposed development would have on views from the north of the site which would have historically been part of the Whitbread Brewery. Here the roof extensions appear as a dominant element, drawing the eye away from the existing built form. This similarly applies to kinetic views down Chiswell Street detracting from the ability to appreciate the distinctive character within this small enclave in the City of London.

#### **Policy and Guidance**

Section 16(2) of the Planning (Listed Building and Conservation Areas) Act 1990 makes it a statutory duty for the local authority or Secretary of State, when considering whether to grant listed building consent, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Regarding planning permission, section 66(1) of the Act makes it statutory duty for decision makers to have special regard to the desirability of preserving listed buildings or their setting. Section 72 of the Act states that special attention must be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Guidance on carrying out this statutory duty is set out by the Government within the National Planning Policy Framework (NPPF). Paragraph 205 states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Any harm caused to the significance of a designated heritage asset will need a clear and convincing justification for doing so in line with paragraph 206 of the NPPF.

Planning practice guidance set out by the government requires any harm identified to either be classified as less than substantial or substantial harm. If the harm is identified as less than substantial, then in line with paragraph 208 of the NPPF this harm should be weighed against the public benefits associated with the proposed scheme.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise'.

London Plan Policy HC1 states 'development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.'

The City of London's Local Plan Core Strategic Policy CS12 sets out the City's objective to 'conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors'.

Policy CS13 states the City's objective to 'protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks'.

The following advice from paragraph 013 of the Planning Practice Guidance accompanying the NPPF entitled 'What is the setting of a heritage asset and how can it be taken into account?' is directly relevant: 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. Additionally, Historic England's guidance on the setting of heritage assets states: 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset'.

Paragraph 013 of the Planning Practice Guidance additionally states: 'The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'.

#### Recommendation

As the application stands there would be less than substantial harm caused to the significance of 53, 54 and 55 Chiswell Street as a group of grade II listed buildings and 56 Chiswell Street. The character and interest of the Brewery Conservation Area and the Chiswell Street Conservation Area are heavily intertwined. The roof extensions would be visible in both kinetic and static views where the scale, materiality and form would obscure and detract from the character and appearance of the Brewery Conservation Area, and the setting of the Chiswell Street Conservation Area. This harm would be less than substantial.

The Georgian Group recommends the applications for Planning Permission and Listed Building Consent be refused by your local authority.

In determining this application, you should bear in mind the statutory duties contained within sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Yours sincerely,

Eddie Waller IHBC Conservation Adviser for London and South East England 
 From:
 Gill Pedler

 To:
 PLN - Comments

Subject: The Whitbread Brewery, 49-56 Chiswell Street and South Yard buildings, London EC1Y 4SA 24/00863/FULL

Date: 02 October 2024 17:26:54

You don't often get email from Learn why this is important

THIS IS AN EXTERNAL EMAIL

F.A.O Emma Barral

Our ref 198362

Your ref 24/00863/FULL

The Whitbread Brewery, 49-56 Chiswell Street and South Yard buildings, London EC1Y 4SA

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

Dear Emma

Thank you for notifying the SPAB of the above application for alterations to this important group of listed buildings. Having reviewed the application documents, we would like to register our objection.

The SPAB generally only comments where a building has pre-1720s origins, and it would appear from the information submitted that of the collection of listed buildings within the development site, the central five bays of Partners House is within our remit. We defer comment on proposals for the later structures to colleagues at other amenity societies.

Partner's House is a grade II\* listed building of particular architectural and historic interest. It is the only building on the site to predate the Whitbread Brewery and is believed to have been built c.1700. The two bays to the east were added in 1750 and the bays to the west, in the 19<sup>th</sup> or early 20<sup>th</sup> century. Although the majority of the building was rebuilt in 1876, some original fabric remains, including the stair which rises the full height of the building.

We understand that the proposed roof extensions are to be situated above the eastern range of the listed buildings adjacent to Partner's House. While these extensions are not visible from street level, they are highly prominent within the streetscape and from the Barbican Podium. We consider that the dominant form of the proposed upper levels would detract from the significance of Partner's House, thereby diminishing its importance within the streetscape and causing an unjustifiable level of harm.

Additionally, we note that the internal alterations to Partner's House include the removal of several doors/doorcases from the ground, first and second floors of the earliest part of the building. The significance of the fabric to be lost has not been described, however, should these interventions result in the loss of historic fabric, we would object to their removal.

We therefore recommend that permission is refused.

We hope these comments are helpful to you.

Best wishes

Gill

#### **Gill Pedler**

Casework Officer

Part-time hours: Monday to Wednesday

Please send all notifications of listed building consent applications, faculty applications or requests for preapplication advice to <a href="mailto:casework@jcnas.org.uk">casework@jcnas.org.uk</a>

The Society for the Protection of Ancient Buildings (SPAB) 37 Spital Square, London E1 6DY | 020 7377 1644 | spab.org.uk Follow @spab1877 on <a href="Instagram">Instagram</a> | Facebook | Twitter/X | LinkedIn

Charity no. 111 3753 | Scottish charity no. SC 039244 | Registered in Ireland 20158736 | Company no. 5743962



### City of London Conservation Area Advisory Committee

Department of the Built Environment, Corporation of London, P.O. Box 270, Guildhall, London EC2P 2EJ

11th October 2024

Dear Sir/Madam,

At its meeting on 19<sup>th</sup> September 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.114 24/00863/FULL – Hotel The Whitbread Brewery, 52 Chiswell Street, London EC1Y 4SA Brewery Conservation Area/Coleman Street Ward. Ward Club rep. Michael Khan.

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

The Committee objected strongly to the proposal considering that the bulk, scale and mass of the addition to be over large in comparison with listed building. Members also considered that the design was out of keeping and that it was inappropriate and harmful to the character and appearance of the Conservation Area.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

Mrs. Julie Fox Secretary



Mr Thomas Roberts City of London PO Box 270 Guildhall London EC2P 2EJ Direct Dial:

Our ref: P01583264

16 October 2024

Dear Mr Roberts

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

HOTEL THE WHITBREAD BREWERY 52 CHISWELL STREET LONDON EC1Y 4SA Application No. 24/00863/FULL

Thank you for your letter of 1 October 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

#### **Summary**

The site forms part of the former Whitbread Brewery, a large industrial complex that stood here for over 200 years. The listed buildings on Chiswell Street are survivors of its early Georgian establishment and Victorian redevelopment. When the brewery closed in the 1970s, the site was cleared, and the listed buildings extended to the rear at roof level. This development is visible from the street and has some harmful impacts.

Whilst many aspects of proposals to alter and extend the listed buildings on this site do not raise issues for Historic England, the height, scale and bulk of the proposed roof extensions would, in my view, cause harm to designated heritage assets through development in their setting.

Given our serious concerns about these proposals, I strongly recommend that the design approach is modified to reduce the impact of any new development on the heritage assets identified. To enable you to do so, the necessary LBC authorisation has not been issued at this time.

#### **Historic England Advice**



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA



#### **Significance**

#### Origins of the Whitbread Brewery

Samuel Whitbread bought the King's Head Brewhouse and associated courtyard on the south side of Chiswell Street in 1748. The site was cleared and by 1750 the new brewery began the mass production of porter. The operation expanded rapidly with new storehouses and engines as well as a counting house, tap room and other ancillary uses built to support the wider operation. By the time of Samuel Whitbread's death in 1786, the Chiswell Street brewery was producing more than 200,000 barrels a year. Its success spurred its expansion to both sides of Chiswell Street and by the early twentieth century, it had reached its greatest extent with production exceeding 330,000 barrels annually. The buildings were remodelled over time to encompass new technologies and to respond to the social changes in drinking establishments.

#### The buildings

This area suffered severe bomb damage during WWII, although the Brewery site survived largely intact. Post-war planning to rebuild here brought significant changes including the development of the Golden Lane and Barbican Estates to encourage residential and other uses within the City, inspired by the work of Le Corbusier at Unite in Marseille.

Brewing ceased here in 1976 and most of the industrial buildings cleared for new offices and homes. The buildings on Chiswell Street had already been listed in 1950 and were retained by the Whitbread Company for its corporate activities. These include:

<u>Partners House (II\*)</u>: the only pre-brewery building to survive, it dates to c.1700 notable for its window frames set flush with the brickwork and its protruding timber cornice. The rear element of its M-roof form was replaced in the 1970s with a flat roof extension

Entrance Wing (II): a segmental-arched carriageway entrance to the complex built as part of the 1890s redevelopment of the brewery although the buildings flanking this are earlier. It was extended east in the late nineteenth century and now has a modern mansard.

The Jugged Hare PH (No 49 and formerly The King's Head) (II): late nineteenth century pub built to replace an earlier pub associated with the brewery. It stands on the junction of Silk Street and Chiswell Street, defining the corner with a gently curving façade.

<u>Chiswell Street (Former St Paul's Tavern) (II):</u> the eighteenth-century pub was refronted in the mid-late nineteenth century with moulded stucco to the window



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA



architraves, a projecting cornice supported on consoles and sculpted projecting parapet.

Also listed Grade II are 53, 54 and 55 Chiswell Street, the bridge over the brewery yard, sugar room, former Porter Tun room, the brewery building on Silk Street and brewery building on Milton Street.

The surviving buildings were largely associated with the administrative and hospitality aspects of the industrial complex, such as offices and tap rooms. They represent differing periods of the brewery's 200-year presence on this site but are of a similar height, scale and mass which is reinforced by the coherence of their elevational rhythm and material palette. The close-grained townscape and modest scale of the buildings contributes to their local distinctiveness. The homogeny in their character and appearance is particularly notable given the larger office buildings that surround them.

The modern roof extensions to the rear of the listed buildings were added in the late 1970s. They are visible from the street, particularly from Lamb's Passage, but their scale, form and materiality help to reduce their impact. Nevertheless, they do cause a degree of harm to the designated heritage assets.

#### Brewery and Chiswell Street Conservation Areas

The listed buildings described above fall within Brewery Conservation Area. It was designated following the 1994 local authority boundary amendment which transferred these buildings from LB Islington to the City. Chiswell Street Conservation Area, which was designated in 1985, remains within LB Islington, contains the other surviving Whitbread buildings to the north. Of a similar scale and character, together they form a highly distinctive enclave.

Beyond the conservation area boundary, the wider area is very mixed in appearance with largely high-density townscape in its immediate vicinity. While the Brewery Street Conservation Area contains a tight grain of mainly listed buildings set around a courtyard, its immediate setting is dominated by large-scale modern office developments.

The Barbican Estate, icon of the Brutalist Movement in Britain, forms part of this wider setting. Its high-level pedestrian walkway, known as the Podium, offers views of the conservation areas and particularly those buildings on the south side of Chiswell Street. The estate is listed Grade II and a main component of the Barbican and Golden Lane Estate Conservation Area.

#### The proposals and their impact



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA



#### **Proposals**

The proposals seek to alter and extend the existing hotel to create 19 additional bedrooms. There would also be internal alterations to improve access, fire egress and mechanical and electrical infrastructure. The most notable impact is the replacement of the 1970s roof extensions with new larger, more extensive development that would be clearly visible in street views.

The proposed new roof will be between 1 to 2 storeys higher than the existing 1970s roof extensions and sit forward of the current extension line, closer to the Chiswell Street façade. Whilst some of the new floorspace is for additional plant equipment, much of the additional volume is dedicated to the new hotel rooms.

#### **Impacts**

Although set back from the street frontage, the overall height and scale of the proposed extensions is substantially greater than the existing. The elongated sawtooth roof form means that the new rooms have greater floor to ceiling heights than the existing. Whilst the design intent is to reflect the lost industrial character, it is visually conspicuous and creates an uncomfortable contrast with the polite architecture of the listed buildings below, their orthogonal character and proportions of scale based on classical principles.

The bulk and mass of the proposals are further emphasised by their materiality. The lower element would be fully glazed and highly conspicuous when lit at night. The dark grey and black mesh façade treatment to the upper roof element appears oppressive due to its colour, compounded by that it is relatively solid form.

The proposed roof extensions would, therefore, starkly contrast with the coherent lowrise scale of the 18th and 19th century buildings below. The bold architectural form of the proposed extension would make it a particularly overbearing presence in the context of the group of listed buildings and their homogeneous composition.

The other internal works will have some impacts on the listed buildings but do not raise substantive matters for Historic England.

#### Relevant policy and guidance

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the obligation on local planning authorities to pay special regard to preserving the special interest of listed buildings and their settings, and special attention to preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA



for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development. Relevant policies include: 201, 205, 206, 208, 209 and 212.

The London Plan 2021 provides the spatial development strategy for Greater London. Policy HC1 of the London Plan relates to heritage conservation and growth. Part C states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.

Other relevant policy and guidance documents include:

- The London Plan (2021)
- The City of London Local Plan (2015)
- The Brewery Conservation Area Character Study (City of London, 2000)
- Chiswell Street Conservation Area Design Guidelines (LB Islington, 2002)
- The Setting of Heritage Assets (GPA 3, Historic England, 2015)

#### Recommendation

Historic England has concerns regarding the application on heritage grounds. The proposals would cause harm to a range of designated heritage assets including several listed buildings, the Brewery and Chiswell Street Conservation Areas through development within its immediate setting.

The harm relates to the scale and bulk of the extension scheme which we consider would have an overbearing presence in views from the east along Chiswell Street towards Whitecross Street and from the north along Lamb's Passage. It will also be visible from the Barbican Podium at Ben Johnson House where its height, scale and bulk will be clearly apparent in relation to the range of listed buildings.

We consider that the harm would be greatest to the component designations of the former Whitbread Brewery that are listed Grade II and in respect of Partners House, Grade II\*. These buildings are also the heart of the Brewery Conservation Area and read in conjunction with the Chiswell Street Conservation Area to the north.

It is the harm to local street views of Partners House that would attract the most weight due to its exceptional significance as a Grade II\* listed building (NPPF, Para 205). However, it should be recognised that this is seen in the context of a wider group of



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA



Grade II listed buildings associated with the brewery and that this has collective significance. I therefore strongly recommend that the height of the proposed development is reduced so it would appear subservient to the listed buildings below.

The NPPF also states that, if harm is unavoidable, opportunities should be sought to minimise the harm (NPPF, Paras 201 and 212). While a reduction in the height of the proposals would lower the harm to listed buildings and the Brewery Conservation Area, opportunities to reduce its overall bulk and mass, potentially with more muted façade treatments, should be explored to help reduce its impact.

Given the extent of our concerns and to enable you to address these with the applicant, the necessary LBC authorisation has not been issued at this time.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

Breda Daly	
Inspector of Historic Buildings and Areas	
E-mail:	





Mr Thomas Roberts City of London PO Box 270 Guildhall London EC2P 2EJ

Our ref: P01583264

19 December 2024

Dear Mr Roberts

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

# HOTEL THE WHITBREAD BREWERY 52 CHISWELL STREET LONDON EC1Y 4SA Application No. 24/00863/FULL

Thank you for your letter of 29 November 2024 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

#### **Historic England Advice**

Historic England provided advice on the original application on 16 October 2024 in which I outlined our serious concerns about these proposals on heritage grounds.

Whilst amendments have subsequently been made to the scheme, the impact of the height, scale and bulk of the proposed roof extensions remain broadly similar. Our advice therefore remains unchanged, and I remain of the view that the development would cause harm to a range of designated heritage assets including several listed buildings, the Brewery and Chiswell Street Conservation Areas through development within its immediate setting.

As set out in our earlier letter, the harm relates to the scale and bulk of the extension scheme which we consider would have an overbearing presence in views from the east along Chiswell Street towards Whitecross Street and from the north along Lamb's Passage. It will also be visible from the Barbican Podium at Ben Johnson House where its height, scale and bulk will be clearly apparent in relation to the range of listed buildings.

We consider that the harm would be greatest to the component designations of the former Whitbread Brewery that are listed Grade II and in respect of Partners House, Grade II\*. These buildings are also the heart of the Brewery Conservation Area and read in conjunction with the Chiswell Street Conservation Area to the north.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA



It is the harm to local street views of Partners House that would attract the most weight due to its exceptional significance as a Grade II\* listed building (NPPF, Para 205). However, it should be recognised that this is seen in the context of a wider group of Grade II listed buildings associated with the brewery and that this has collective significance.

#### Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice letter of 16 October 2024 need to be addressed in order for the application to meet the requirements of the National Planning Policy Framework. In its current form, we object to these proposals.

Should your authority be minded to grant consent, careful consideration should be given to the conditions associated with it to secure the design outcomes aspired to by these proposals. Careful consideration should be given in particular to materials, junction details and securing repairs to historic fabric that are set out as public benefits prior to occupancy.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

**Breda Daly** 

Inspector of Historic Buildings and Areas



From: Ross Anthony
To: PLN - Comments

Subject: Application Ref: 24/00863/FULL - The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

**Date:** 20 December 2024 12:41:19

#### THIS IS AN EXTERNAL EMAIL

FAO: Hibaaq Gelleh

## Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA Application Ref: 24/00863/FULL

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

**Statutory Remit:** Historic Buildings & Places (formerly the AMS) is a consultee for Listed Building Consent applications, as per the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.* 

**Comments:** Thank you for notifying HB&P of the amended and additional documentation submitted for the above application.

HB&P objected to the initial plans submitted for this application due to the impact the proposed roof top addition would have on the relevant listed buildings and the character of the Brewery Conservation Area. The minor changes to the setbacks and design shown in the amended plans do not alleviate those concerns and therefore HB&P maintains our objection.

As previously stated, HB&P accept the principle of an appropriately scaled and designed upward extension. However, that extension must respect the architecture and historic qualities of the listed buildings and the conservation area and should not be so overtly dominant and out of character with the host heritage assets involved.

**Policy:** The City of London Local Plan 2015; Policy DM 12.2 Development in conservation areas states that: 'Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area'.

Policy DM 12.2 states that: 'In the design of new buildings or alteration of existing buildings, developers should have regard to the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale'.

This is reflected in draft policy HE1 in the draft Local Plan 2040.

Chapter 16 of the NPPF (2024), particularly paragraph 212, states: 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

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

**Recommendation:** Refusal for being contrary to the City of London Local Plan, the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990.

#### Regards

#### Ross Anthony

#### **Case Work**



www.hbap.org.uk

The Courtyard 37 Spital Square London E1 6DY

Historic Buildings & Places is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). It is one of the National Amenity Societies and a consultee on Listed Building Consent applications as per the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. We are concerned with historic assets of all types and all ages, including planning applications affecting historic buildings in conservation areas and undesignated heritage.

From:
To: PLN - Comments

**Subject:** Application: 24/00863/FULL & 24/00864/LBC

**Date:** 23 December 2024 11:32:18

#### THIS IS AN EXTERNAL EMAIL

Dear Ms Gelleh,

Thank you for consulting the Georgian Group on the amended plans for the Whitebread Brewery site. We acknowledge the amendments made to the proposed applications for Planning Permission and Listed Buildings, however they do not address our previous concerns.

The Group maintains its objection to the applications for Planning Permission and Listed Building Consent.

Kind regards,

Eddie Waller IHBC
Conservation Adviser
London and South East England



#### Support the Georgian Group, become a member | georgiangroup.org.uk

The information contained in this e-mail and any files transmitted with it are confidential and intended solely for the use of the individual(s) named. If you are not the named addressee(s) you should not copy, disseminate or distribute this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free since information can arrive late or contain viruses, or be corrupted, destroyed, incomplete, intercepted, or lost. The sender therefore does not accept liability for any errors or omissions in the contents of this message which arise as a result of e-mail transmission. If verification is required please ask for a hard-copy version.

 From:
 Gill Pedler

 To:
 PLN - Comments

Subject: The Whitbread Brewery, 49-56 Chiswell Street and South Yard buildings, London EC1Y 4SA 24/00863/FULL

Date: 06 January 2025 11:58:08

You don't often get email from

Learn why this is important

#### THIS IS AN EXTERNAL EMAIL

F.A.O Hibaaq Gelleh

Our ref 201227

Your ref 24/00863/FULL

The Whitbread Brewery, 49-56 Chiswell Street and South Yard buildings, London EC1Y 4SA

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

Re-consultation due to updated drawings.

Dear Hibaaq

Thank you for notifying the SPAB of the additional information provide in support of the above application for alterations to this important group of listed buildings. Having reviewed the application documents, we would like to register our objection.

We refer to our previous response of 2<sup>nd</sup> October and note that the additional information does not address the points raised.

We therefore object to this application and recommend that it is refused.

We hope these comments are helpful to you.

Best wishes

Gill

#### Gill Pedler

Casework Officer

Phone number:

Part-time hours: Monday to Wednesday

Please send all notifications of listed building consent applications, faculty applications or requests for preapplication advice to <u>casework@jcnas.org.uk</u>

The Society for the Protection of Ancient Buildings (SPAB)

37 Spital Square, London E I 6DY | 020 7377 1644 | spab.org.uk

Follow @spab1877 on Instagram | Facebook | Twitter/X | LinkedIn

Charity no. 111 3753 | Scottish charity no. SC 039244 | Registered in Ireland 20158736 | Company no. 5743962

