

# Comments for Planning Application 24/00863/FULL

## Application Summary

Application Number: 24/00863/FULL

Address: Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

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

Case Officer: Emma Barral

## Customer Details

Name: David Coleman

Address: [REDACTED] London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I welcome the proposals for the ground floor, including the opening of a new entrance on Chiswell Street.

I object to the roof extensions.

The stated intention of the proposals is

"Celebrating the unique history and architectural moments of the site through a sensitive approach to preserve the building's heritage and enhance its charm."

In the Townscape, heritage and visual impact assessment, the impact on the streetscape is judged as:

"The introduction of a contrasting modern form within the context of the existing, mixed, streetscape is wholly appropriate and the listed buildings would continue to be read and understood in much the same way as they are now .... There would be a change of Moderate magnitude to townscape with a High sensitivity to change. The quality of effect would be Beneficial."

I disagree. The "contrasting modern form" of the saw tooth black boxes is ugly, alien and draws the eye away from the pleasing forms of the historic streetscape. This design should be rejected as inappropriate and the developers asked to rethink.

I have a concern about the noise levels of the new plant being proposed. Night-time noise levels at Cromwell Tower (39 bedrooms in direct line of sight) are predicted to be exactly at the level required by City regulations - ie. no margin at all for uncertainty in the calculations or the impact of weather conditions. A planning condition should be attached which requires the developers to undertake fuller before and after monitoring to ensure that there are no increased noise impacts on Cromwell Tower.

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Case Officer: Emma Barral

## Customer Details

Name: Miss Amber Patrick

Address: Association for Industrial Archaeology Ironbridge Gorge Museum, Coalbookdale Telford

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The Association for Industrial Archaeology notes that this application relates to the Hotel in the former Whitbread Brewery. It includes some demolitions, alterations and extensions particularly an upward one to provide additional floorspace. There will be altered and additional entrances, some facade and internal alterations and associated works. The Whitbread Brewery site has already been subject to substantial alteration over the years, when it was a working brewery and subsequently with its partial reuse as a hotel. It is inevitable that there should be a need for further alterations to enable the Hotel to remain a successful business. The majority of the proposed alterations should not present any problems, such as the internal ones and even exterior ones such as entrances. However, there is one main change and that is the roof extension. The proposal is to replace the present one which is already a non-original extension. It is appreciated that the intention is that it will be clearly not an original part of the Brewery and that it may not be particularly visible, but it does not fit in with the surroundings. Alterations to buildings even when in their original use might be designed to fit in with the original design features or they may be designed simply to be functional for the business with no consideration given to the aesthetics of the building/site. Providing additions at this stage in a building's history provides an opportunity to ensure that they may be identifiable as a subsequent addition but also that they fit the identity of both the building's original use and history, as well as its location and therefore their visibility and effect on the surrounding area. Therefore although the Association only objects to the replacement upward extension. It should be designed to be both distinctive as a later addition but also fit in with the building and its surroundings.

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Case Officer: Emma Barral

## Customer Details

Name: Dr Alison Edwards

Address: COUNCIL FOR BRITISH ARCHAEOLOGY De Grey House, St Leonard's Place YORK

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Thank you for notifying the Council for British Archaeology (CBA) of this application.

The Whitbread Brewery is an interesting multi-phase site with high evidential and historical value. It makes a positive contribution to our understanding of the economic and architectural development of the area and is a landmark in the City of London's Brewery Conservation Area.

The CBA do not wish to make detailed comments on the proposed internal alterations at this point. However, we object to the scale and design of the proposed upward extension to the Entrance Wing and nos. 53-56 Chiswell Street. Although the existing roof extension is modern and does not contribute to the building's historic significance, it is set back, unobtrusive and of sympathetic materials. The proposed roof extensions would be highly visible above the listed buildings and the black cladding would be entirely out of character for the surroundings. It would significantly change the aesthetic and architectural character of the listed buildings, and would cause harm to the wider Brewery Conservation area.

We do not consider that the proposed designs meet the requirements of paras. 205 & 206 of the NPPF, section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act, or Policy HE1 of the Draft City Plan. We recommend that the application is withdrawn and the plans revised.

Please keep the CBA informed of any developments with this case.

Kind Regards,

Dr Alison Edwards

Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, 'Arrangements for handling heritage applications - notification To Historic England and National Amenity Societies and the Secretary of state (England)' direction 2021.

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Case Officer: Emma Barral

## Customer Details

Name: Dr Tamsin McMillan

Address: Gardens Trust 70 Cowcross Street London

## Comment Details

Commenter Type: Other

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

Comment Reasons:

- Other

Comment: Thank you for consulting the Gardens Trust on this application.

We have considered the information that you have provided and on the basis of this do not wish to comment on the proposals at this stage.

We would however emphasise that this does not in any way signify either our approval or disapproval of the proposals.

If you have any further queries, please contact us at [consult@thegardenstrust.org](mailto:consult@thegardenstrust.org), and we would be grateful to be advised of the outcome of the application in due course.



**Ref: 24/00864/LBC The Whitbread Brewery 52 Chiswell Street, EC1Y 4SA**

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

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage.

We object to this planning application as it would totally alter the character of the building with the associated loss of significance of the listed buildings at 53, 54, 55 and 56 Chiswell Street.

The Whitbread Brewery on Chiswell Street was founded by Samuel Whitbread in 1750, as the country's first purpose-built mass-production brewery and was in operation for over 200 years before closing down in 1976. The site is now known as 'The Brewery', and has been converted into a corporate, party and weddings venue. The site encompasses eight Grade II and Grade II\* listed buildings and is fully situated within the Brewery conservation area.

The site holds high historical significance in that it represents an almost intact example of the Whitbread Brewery site as it would have stood before the middle of the 20th century.

The development includes for 'a contemporary roof extension containing additional hotel bedrooms to the Entrance Wing, 53, 54, 55 and 56 Chiswell Street.' This extension will be clad in cross-hatch mesh and linear and horizontal corrugated black metal.

Whilst it is recognised that the rooftop extension is intended to replace a modern extension, it is our opinion that the dominance of the black metal structure as seen from Chiswell Street, as shown in pages 5 and 82 of the applicants design and access statement, will create a significant negative contribution to the heritage significance of the listed buildings and their setting.

We refute the statement made in para 5.10 of the Townscape, Heritage and Visual Impact Assessment: *The design and language of the new extension takes its inspiration from the industrial history of the site, in particular from the angular aesthetic of the saw-toothed roof form traditionally found on the brewery buildings, as well as in its use of metal providing further industrial texture. The proposed use of profiled black sheet-metal cladding clearly introduces new materiality to the current roofscape, but with some historical precedent and justification: this part of the brewery was formerly raised and roofed in arched corrugated iron.*

Throughout its history, the brewery roofline has always consisted of mansard roofs, and at no point is there any indication of any industrial saw-tooth roofs.

Paragraph 200 of the NPPF requires that: *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.*

Paragraph 202 of the NPPF requires that: *Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

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

The Committee are of the opinion that the proposed industrial metal saw-toothed roof extension will lead to loss of significance of the listed buildings, which whilst it is recognised that such loss may be considered as less than substantial harm, such loss outweighs the negligible public benefits that would be provided.

**The Committee therefore strongly recommends that this planning application be refused.**

Vicki Fox (Hon. Secretary)  
**LAMAS – Historic Buildings & Conservation Committee**

**30 September 2024**



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Re-consultation due to updated drawings.

Case Officer: Hibaaq Gelleh

## Customer Details

Name: Dr Alison Edwards

Address: COUNCIL FOR BRITISH ARCHAEOLOGY De Grey House, St Leonard's Place YORK

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Thank you for notifying the Council for British Archaeology (CBA) of these revised proposals.

We note that sections of the proposed upward extensions have been stepped back from the roofline, which slightly improves the impact on the streetscape. The colour has also been slightly amended.

However, we still consider that the design and massing of the proposed rooftop additions are unsuitable for this historic brewery complex, and would cause harm to the building's historic significance and to the Brewery conservation area.

The angular, minimally fenestrated design of the new structures fails to respond to the regular, polite frontages of the listed buildings on Chiswell Street, creating a jarring visual effect. The scale and massing of the proposed new structures, despite the reductions proposed by this amendment, remains overly dominant in the street scene.

The CBA maintain our previous objection to this application. We do not consider that it meets the requirements of paras. 212 and 213 of the NPPF (as revised Dec. 2024), section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act, or Policy HE1 of the Draft City Plan. Unless considerable alterations are made to the scale and design of the proposed upward extensions to this historic complex, we recommend that this application be refused.

I trust these comments are useful to you. Please keep the CBA informed of any developments with this case.

Kind Regards,  
Dr Alison Edwards  
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, 'Arrangements for handling heritage applications - notification To Historic England and National Amenity Societies and the Secretary of state (England)' direction 2021.

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Case Officer: Hibaaq Gelleh

## Customer Details

Name: Dr Tamsin McMillan

Address: Gardens Trust 70 Cowcross Street London

## Comment Details

Commenter Type: Other

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

Comment Reasons:

- Other

Comment: Thank you for consulting the Gardens Trust on this application.

We have considered the information that you have provided and on the basis of this do not wish to comment on the proposals at this stage.

We would however emphasise that this does not in any way signify either our approval or disapproval of the proposals.

If you have any further queries, please contact us at [consult@thegardenstrust.org](mailto:consult@thegardenstrust.org), and we would be grateful to be advised of the outcome of the application in due course.

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Re-consultation due to updated drawings.

Case Officer: Hibaaq Gelleh

## Customer Details

Name: Mr Andrew Vergottis

Address: [REDACTED] London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I strongly object to the roof extensions, due to noise levels. The night-time noise and proximity to Cromwell Tower and Ben Jonson House bedrooms would be a huge disruption. Given the track record of the Brewery with regard to noise complaints, I have no confidence in before/after monitoring in alleviating the issue.

No objection to the ground floor proposals/new entrance.

Gwyn Richards  
Director of Planning and Development  
City of London Corporation  
PO Box 270  
Guildhall  
EC2P 2EJ

15 January 2025

Dear Mr Richards,

**Re:** 24/00864/LBC | Partial demolition of existing building, alteration and extension of the existing hotel, to include additional floorspace through upward extensions; altered and additional entrances; external urban greening; external plant enclosures; facade alterations; internal alterations; and, associated works. Re-consultation due to updated drawings. | Hotel The Whitbread Brewery 52 Chiswell Street London EC1Y 4SA

Further to my comments of 17 September last re the above application, today I became aware of revised drawings having been submitted by the applicant last November! I would like to know why I wasn't advised of the *re-consultation due to up to date drawings*. Please advise by return

My comments were addressed to the application for Listed Building Consent – but should be treated as comments on the related application for Planning Permission (24/00863/FULL) please. Having now had the opportunity of considering the up to date drawings my objection to both 24/00863/FULL – and 24/00864/LBC) remain. In particular:

1. The revised roof treatment appears to be even closer to the Hastings fishermen's huts, even if a *slightly lightened grey metal façade* is now proposed. The loss of three rooms is obviously unwelcome but, surely, a less intrusive roof treatment isn't beyond the scope of the architects, one that recovers the lost rooms even. Certainly, a more conventional design, one which didn't pretend to take its cue from never-existent industrial buildings, could be produced;
2. I suggested the addition of secondary-glazing for obvious environmental reasons. However, I note that the applicant's agent's covering letter of 25 November proposes a commitment to carry out *works to repair (and where necessary, sympathetically replace) windows*. Repairing and replacing may be necessary but the windows still won't be double-glazed so secondary-glazing will still be needed as per my original comments; and
3. The proposed public benefits, while welcome, should be extended to include specific benefits for nearby residents. These could include the provision of meeting rooms, reduced rate tariffs for bedrooms, discounts for meals etc.

As amended above, my original comments remain and extend to both 24/00863/FULL and 24/00864/LBC. I ask that consideration of the two applications should be deferred until an unintrusive roof treatment has been submitted. Please add these comments to the planning portal for both applications.

Best regards,

Fred Rodgers

