

Committee: Planning Application Sub Committee	Date: 9 th September 2025
Subject: Custom House, 20 Lower Thames Street and River Wall, Stairs and Crane, Custom House Quay, London, EC3R 6EE. Works to the Custom House and its immediate environs, comprising: Change of use of existing building and riverside car park from office (Use Class Eg(i)) to a hotel-led mixed-use building comprising the following components: 1. Hotel (Use Class C1); 2. Basement spa and health centre (Use Class E(d)); and 3. Ground floor food and beverage, public north/south route, gallery and events spaces (Sui Generis). Together with the alteration, extension, and refurbishment works to the interior and exterior of all three (Western, Central and Eastern) wings of Custom House, to facilitate the redevelopment of the existing building. Introduction of new mechanical/electrical/plumbing services throughout the building to facilitate the proposed use and provision of associated rooftop plant enclosures. The implementation of a public realm scheme to the existing quayside including replacement of southern ground floor external stairs to the Central wing, introduction of a new river terrace including stairs and step free access, new steps and ramp to the site's south-western boundary, revised flood wall and removal of existing vehicle ramp and replacement with vehicle lift. The provision of a site-wide landscaping scheme as well as works to the river wall, works to the flood defence walls, works to the western boundary wall and external works to facilitate servicing, vehicular drop off, cycle and disabled parking and all associated works.	Public
Ward: Billingsgate	For Decision
Registered No: 25/00270/FULMAJ	Registered on: 19 March 2025
Conservation Area: No	Listed Building: Grade I

1. Amendments to Cover Sheet

12. OPERATIONAL CARBON EMISSIONS	Total operational carbon emissions: 56,016,128.0kgCO2e Total operational carbon emissions per square metre: 2683.6CO2e/m2 GIA
14. WHOLE LIFE CYCLE CARBON EMISSIONS	Total whole life-cycle carbon emissions: 19,39,298 kgCO2e Total whole life-cycle carbon emissions per square meter: 916 kg CO2e/m2 GIA

2. Additional Representations

3. One additional letter of support was received and this appended to this addendum.

4. Amendments and Corrections to the Main Report

5. Please note the following errata and clarification corrections:

6. Paragraph 135 is amended to remove the strikethrough text in red:

In 1989, the London Port Collection moved to Gravesend and the Investigation Department (now Fraud and Investigation (FIS)) moved into the Custom House following extensive renovations in the early-1990s which included the increased security surrounding the site premises to designs by S K F Architects, including alterations to the internal arrangements (LPA application ref. 5023, approved 10 September 1991). The HMRC war memorial was moved to ~~its present location~~ in the entrance lobby from Somerset House in 2013 (13/00846/LBC). An additional war memorial for Inland Revenue personnel, found in storage, was installed in 2016 (16/00237/LBC).

7. Paragraph 218 is amended to insert the text in red:

The proposals will require the minor loss of historic fabric within the river wall to facilitate drainage across the site, with a low degree of less than substantial harm arising, albeit the harm is considered to have been minimised. The resiting of one of the historic Cranes into the steps is considered to bring heritage benefits in the revealing of its historic use and amplifying the group value and historic functional relationship and use of the river, quayside and

Custom House. As above, the improvements to the setting of these listed structures is considerable, restoring the open character of the riverside and improving the overall architectural quality of their surroundings. The improvements to accessibility along the waterfront is also a key consideration, dramatically increasing the ability to appreciate these features in what is currently an off-putting backland environment. These heritage harms and benefits are given great weight and considered in the full planning balance section later in this report.

8. The table in paragraph 471 is amended to read:

Scope	Proposed Development	Benchmark	GLA Benchmark
RICS components	KgCO2/m2	KgCO2/m2	
A1 – A5	272.672	< 850	GLA Benchmark
		< 500	GLA Aspirational
B – C (excluding B6 & B7)	349.460	< 350	GLA Benchmark
		< 300	GLA Aspirational
A – C (excluding B6 & B7; including sequestered carbon)	592.764	< 1200	GLA Benchmark
		< 800	GLA Aspirational
B6 + B7	323.240 2683.6		

9. Paragraph 472 is amended to read:

These figures would result in overall whole life-cycle carbon emissions of ~~19,397,298~~ 70,073,128.0 kgCO2e being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for ~~6,844,922~~ 56,016,128.0 kgCO2e (35.3% 79.94% of the building's whole life-cycle), and the

embodied carbon emissions for 12,552,376 14,057,000kgCO₂e (64.7%–20.06% of the building's whole life-cycle carbon). The building's high operational carbon emissions arise from the significant hot water and energy demand typifying hotel use, with constraints to the improvement of the building's envelope further adding to its energy consumption and associated carbon impact. Building services and works to the substructure constitute the greatest contributors to embodied carbon, with significant emissions also arising from concrete, elevators and pipework.

10. The following parts of paragraph 533 are amended to read:

- Local Procurement Strategy (Demolition Strategy due prior to Commencement and the Construction Strategy due prior to implementation).
- Delivery and Servicing Management Plan (including Consolidation), plus annual review of the plan for the first 5 years following Occupation, to include but not be limited to the following provisions:
 - Delivery trips must take place outside the periods of 07:00–10:00, 12:00–14:00, and 16:00–19:00
 - No servicing with goods vehicles greater than a width of 2.3m or a length of 8m
 - The use of cargo bike deliveries wherever possible
 - Deliveries capped at 28 vehicles, targeting 14 vehicles as part of 50% consolidation, or 196 vehicles per week, whichever shall be fewer.
- City Walkway (Declaration, Specification, Works and Public Access - 24/7)

11. Background Papers

12. The following document was erroneously omitted from the list of Application Documents listed in the Background Papers:

- WLC 3rd Party Verification Report Stage 2, prepared by Waterman Building Services dated August 2025

13. The representations listed in the Background Papers is updated to include:

- Support, Dr Mark Dennis, 28 August 2025

14. Conditions

15. The following conditions are to be amended to read:

	<p>The terraces, namely Long Room Terrace (First Floor) and Quayside Terrace (External) hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 on the following day, other than in the case of an emergency.</p> <p>The terraces, namely Long Room Terrace (First Floor) and Quayside Terrace (External) hereby permitted shall not be open to Customers between the hours of 21:30 on ones day and 07:30 on the following day.</p> <p>There shall be no set-up or close-down activity of operations on the Long Room Terrace (First Floor) and Quayside Terrace (External) other than between 07:00 and 22:00.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
20	<p>Terrace Music</p> <p>No amplified or other music shall be played on the Long Room Terrace (First Floor) and Quayside Terrace (External), and West Wing Courtyard.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
21	<p>Music</p> <p>No live or recorded music shall be played inside the building that can be heard outside the building.</p> <p>No live or recorded music inside the building shall be played that is audible at the façade of the nearest residential premises after 21:00.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
22	<p>Windows and Doors</p> <p>The doors and windows to any bar or restaurant on the east frontages eastern elevation facing Water Lane shall be kept closed and only used for access purposes.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3</p>

Detailed Drawings

Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details:

- A. Drawn details to 1:10 showing full plans and sections for all proposed new, replacement or adapted stonework, railings, doors, windows, ironmongery cabinetry and/or joinery.
- B. Drawn details to 1:20 showing full elevation, plans and sections for the new quayside terrace, ramp and steps and Old Billingsgate ramp and steps specifying railings and technical compliance with Approved Documents K and M and best practice as set out in BS 8300 (Vol 1) unless otherwise agreed in writing by the Local Planning Authority before that element of the works is commenced on site.
- C. Drawn details to 1:20 showing full internal elevations, fit-out, plans and sections to: Kings Warehouse including retained and relocated timber screens, Long Room, Robing Room, Entrance Hall from Lower Thames Street, Tidewaiters, Café, Gallery, Typical East Wing Bedroom fit out, Typical West Wing Bedroom Fit-out including accessible rooms within each, Spa and Swimming Pool.
- D. Full details of proposed works to Long Room portico, with elevations, plans and sections to 1:20 specifying opening up works, making good, build-up to external areas, details of new flooring, steps, handrails and balustrade.
- E. Full window schedule identifying alterations to each individual window identified for repair, replacement or refurbishment, with methodology specified for all replacement glazing, including any double glazing, secondary glazing or any single pane replacement. Typical detailed 1:10 drawings should be provided showing in plan and section all mouldings, sash structure and awning mechanism, including blind box external fixings, structure, colour and materials.
- F. Drawn details of all alterations to listed River Wall and Steps including to a scale of 1:10.
- G. Details of new roofs and alterations to existing roofs including all plant work, housing, screening, louvres, solar panels, roof lights and making good of fabric following window removal.
- H. Details of new lifts and opening up-works to slab and vaults, including section indicating mitigation for views through windows to Lower Thames Street.

	<p>I. Details of alterations to basement level fenestration and associated basement areas on all elevations and/or windows to accommodate plant.</p> <p>J. Details of the integration of any window cleaning equipment and the garaging thereof, plant, flues, fire escapes, health & safety access systems, vermin control and any other excrescences at roof level.</p> <p>K. Details of all new fire rating measures, including in floors, on glazing and doors, and in addition to fire suppression and evacuation infrastructure including sprinklers, sounders, smoke detectors, directional signage and wet and dry risers, smoke extract.</p> <p>To use reasonable endeavours to provide the drawn details at the scales specified under this condition, and to only deviate, where it is appropriate, for the drawing to be drawn at an alternative scale for legibility purposes.</p> <p>REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.</p>
57	<p>Cycle Parking and Facilities</p> <p>Details of the cycle parking and facilities shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details of the following shall be provided in drawing (at a scale of not less than 1:20):</p> <p>(a) Layout of long and short stay cycle parking</p> <p>(b) The provision of cycle parking shall comprise of long stay cycle parking of 19 long stay spaces and 64 short stay cycle parking spaces.</p> <p>(c) A minimum of 1 space shall accommodate larger/adapted cycles with suitable access and via step free route and associated end of trip facilities and the provision swept path demonstrating that there would be reasonable access for a larger or adapted cycle.</p> <p>(d) Details of the changing facilities, showers (5 including 1 accessible shower) and lockers (18) shall be submitted and approved in writing by the Local Planning Authority.</p> <p>The details hereby approved shall be provided prior to the occupation of the building and maintained throughout the life of the building for the use of occupiers and visitors, without charge to the</p>

	<p>end user, and must remain ancillary to the use of the building and available at all times throughout the life of the building.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy that makes provision for disabled people and encourages greater use of cycles by commuters, and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM10.8, DM16.1, DM 16.3, DM16.4 London Plan policy TS cycling and emerging City Plan policies AT2, AT3 and HL1.</p>
66	<p>Inclusive Access Management Plan</p> <p>Prior to the occupation of the development, an Inclusive Access Management Plan shall be submitted and approved in writing by the Local Planning Authority.</p> <p>All development pursuant to this permission shall be carried out in accordance with the approved documents/drawings, which shall provide specific details on how the development will be constructed, operated and managed for the lifetime of the development to ensure that the highest standard of accessibility is provided.</p> <p>The Inclusive Access Management Plan shall be prepared to demonstrate how an equitable experience will be secured for a range of building users including details of:</p> <ol style="list-style-type: none"> 1. A 'visual story' for accessing the site to include photographs and easy to read text to be made available on the building operator's website for the lifetime of the development. 2. Details of the approved Travel Plan including details of how employees and all visitors can access the Travel Plan prior to visiting the building. 3. A management protocol for the maintenance and breakdown arrangements for lifts including agreed call out times, advance communication and provision of mitigations including clear signposting of alternative routes. 4. Management practices to deliver the inclusive emergency escape plan including provision of inclusivity awareness training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs). 5. Preview information in at least two formats that shall be made available on the building operator's website and maintained for the lifetime of the development, including but not limited to:

	<p>(a) Arrival at the site from a range of step free destinations including travel distances in metres from step-free points of arrival, resting points and photographs of all building entrances.</p> <p>(b) Protocol for reserving and use of the accessible parking bays on Water Lane and user information including any time restrictions and priorities for use, information about gradients and routes in case of flooding.</p> <p>(c) Details of the Changing Places facilities including location, hours of access, availability of slings and key access (as relevant)</p> <p>(d) Details of accessible room layouts with photos and dimensions as well as location of charging points and doors to connecting rooms</p> <p>(e) Details of animal spend areas in a reasonable proximity of the site including dimensions and type of surface.</p> <p>(f) Details of accessible toilet provision including layouts for wheelchair accessible toilets, ambulant accessible toilets, baby change facilities, universal toilets which are not accessible toilets and measures to support family toilet access.</p> <p>(g) Details and frequency of staff training for emergency evacuation including the issue of GEEP and PEEPs, and frequency of review</p> <p>(h) Details of planting maintenance and frequency of cut-back in proximity of paths and seating and how unwelcome scent and touch can be avoided as to meet the best practice as set out in BSI PAS 6463 and demonstrate how the landscaping proposals will meet PAS 6463 14.1.10 with regard to species type, placing and maintenance</p> <p>(i) Information about all assistive technology associated with the development including any loan/hire of assistive equipment for hotel guests</p> <p>(j) Other inclusive facilities as relevant which may include room for reflection/ multi faith prayer room, Quiet Room or family room.</p> <p>(k) Details of the step free route to the basement spa and health centre</p> <p>REASON: To ensure that the development will be accessible to the greatest range of people in accordance with London Plan D5 and the following policy of the Local Plan: DM10.8. These details are required prior to occupation in order that the building's management supports an equitable access to the building and its services minimising additional effort, separation or special treatment.</p>
78	<p>Tables and Chairs and Activation Areas Plan</p> <p>Prior to occupation of the development, a plan showing the locations of where tables and chairs are to be situated in the quayside and a plan showing the location of the activation areas within the quayside shall be submitted and approved in writing by the Local Planning Authority and should be operated and maintained in accordance with the approved details.</p>

	<p>REASON: In order to protect residential/commercial amenities in the building and surrounding area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.</p>
80	<p>City Walkway</p> <p>Provision must be made in connection with the development for the River Thames Path to be provided as City Walkway (pursuant to Part II of the City of London (Various Powers) Act 1967. The City Walkway shall be constructed in accordance with the approved drawings and specifications which are to be submitted to and approved in writing by the Local Planning Authority prior to commencement of relevant works, with such specifications are to include the positions, widths, levels, finishes, handrails and balustrades of the City Walkway, and to include details and specifications of the replacement step-free access ramp proposed at the City Walkway at the Western edge of the site. The construction of the City Walkway shall be completed prior to occupation of the development.</p> <p>REASON: To ensure that facilities are provided for the City Walkway in accordance with the following policy of the Local Plan: DM16.2. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
81	<p>Approved Plans</p> <p>The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:</p> <p>PL-DT-4-01 PL-GA-1-00 PL-GA-1-01 PL-GA-1-02 PL-GA-1-03 PL-GA-1-04 PL-GA-1-05 PL-GA-1-06 PL-SC-1-01 PL-SC-1-02 PL-SC-1-03 CUH-ORM-ZZ-00-DR-A-12150 Rev C01 CUH-ORM-ZZ-01-DR-A-12151 Rev C01 CUH-ORM-ZZ-02-DR-A-12152 Rev C01 CUH-ORM-ZZ-03-DR-A-12153 Rev C01 CUH-ORM-ZZ-04-DR-A-12154 Rev C01 CUH-ORM-ZZ-B1-DR-A-12199 Rev C01 CUH-ORM-ZZ-M1-DR-A-12198 Rev C01 CUH-ORM-ZZ-NO-DR-1-12550 Rev C01</p>

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16. The following conditions are proposed to be added to the Condition Schedule:

82	<p>External Blinds</p> <p>Notwithstanding the provisions of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, the external blinds/shutters shall be not used for the purposes of advertisement, for the lifetime of the development.</p> <p>REASON: In the interests of protecting visual amenity and preserving heritage value, in accordance with Local Plan Policies CS10, CS12, DM3.2, DM10.1, DM12.1, DM12.2 and DM12.3, and emerging City Plan Policies S8, DE2, and DE6.</p>
83	<p>City Walkway</p> <p>There shall be public rights of way and of public access over the City Walkway provided pursuant to Condition 60 for any person to have access thereto on foot and for any person to pass and re-pass thereon on foot as of right (but subject nevertheless to any restrictions which may legitimately from time to time be imposed in relation thereto pursuant to Part II of the City of London (Various Powers) Act 1967).</p> <p>REASON: To ensure the public has access over the City Walkway on this site in accordance with the following policies of the policy of the Local Plan: DM16.2</p>
84	<p>City Walkway</p> <p>Before any existing City Walkway is interrupted a temporary walkway or deviation of the City Walkway must be provided and shall be kept open until such time as the declaration of the permanent replacement City Walkway comes into force.</p> <p>REASON: To ensure satisfactory access to City Walkways by all users in accordance with the following policy of the Local Plan: DM16.2.</p>

85	<p>City Walkway</p> <p>Provision must be made within the development for continuing structural support for the City Walkway(s) in pursuance of Section 10 of the City of London (Various Powers) Act 1967.</p> <p>REASON: To ensure the integrity of the City Walkway in accordance with the following policy of the Local Plan: DM16.2.</p>
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