

07/10/20

**Application: 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.**

**LPA ID: 20/00632/LBC**

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

Dear Sonia Williams,

Thank you for informing the Georgian Group of the above application for Listed Building Consent. After reviewing the application, the Group wishes to register its formal objection to the scheme for the reasons set out below.



## Significance of Asset

The London Customs House is a grade I designated heritage asset. Two architects are responsible for the Customs House that we see today: David Laing and Robert Smirke. David Laing, a pupil of Sir John Soane and Surveyor of H.M Customs from 1810, was responsible for the initial construction and design of the Customs House, completed in 1817. The finished building, much praised, was said to be 'something of a new departure in English architecture; it recalled Durand and the Napoleonic innovators who flourished in Paris a decade earlier'. Laing included engraved plates of the Customs House in his 1818 publication *Plans, Elevations, and Sections of Buildings, public and private, executed in various parts of England*.

In 1824, only a few years after the building's completion, part of the south façade collapsed, along with the floor of the main hall. An investigation was undertaken, where it was determined that badly executed beech piling, installed by a fraudulent contractor, was to blame. Laing had failed adequately to supervise the works. In order to rectify the problem, the project was passed onto the Office of Works which was then responsible for all public buildings in London, and Robert Smirke was put in charge. Smirke had previously resolved the problems of Millbank penitentiary, another faulty Thames side building, so had a growing reputation as a reliable architect who could step in to tackle troubled projects. Smirke rebuilt the fallen southern section of the facade of the Customs House that we see today, whilst altering the internal arrangement of the west wing by adding a Robing Room, where customs officials would have changed into their livery before entering the Long Room. The eastern wing of the building was heavily damaged by bombing in 1940 and entirely rebuilt behind a Portland Stone facsimile of its original façade.

The Grade I-listed Custom House is a building of considerable importance as the work of David Laing and Robert Smirke, two leading architects of the early-19<sup>th</sup> century. The building is a fine example of an early Government building, intended to house a number of related functions, and survives in a legible form despite later changes. The external appearance of the building is little altered since the Smirke phase and retains a clear hierarchy between the wings and central block. With the exception of the east wing, the floorplan of the building survives in a largely unaltered state. The Long Room and Robing Room, each with a very specific functional and ceremonial purpose, are unique survivals within Georgian London, as is the whole building as rare surviving purpose built office space. The building also

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shows an early and innovative use of fireproof construction in the warehouse facilities on the lower floors.

### **Proposal**

The applicant intends to undertake external and internal works, involving partial demolition, alteration and extension, so as to convert the Custom House from office use into a hotel with flexible retail floorspace, leisure facilities and a public realm on the riverfront. A full description of the proposed works can be found at the top of this letter.

### **Georgian Group Advice**

The Georgian Group was involved in pre-application discussions with the applicant's agent, in which the Group questioned the option to convert this grade I designated heritage asset for hotel use. This concern was due to the extensive works that were and still are proposed to the historic fabric both within the building and to its elevations. Due to the harm that would be caused by the proposed works described in this application, the Group's position remains that the conversion of the Customs House into a hotel is not the most viable option.

The provision of hotel accommodation within the wings of the Customs House - in particular, the west wing where a considerable amount of historic fabric survives - will cause harm to the significance of the building. The Customs House has since its construction been used as office space, its cellular form suits this use, and it has not been heavily altered during the building's lifespan. The amount of sub-division required to turn the current office spaces into hotel rooms is considerable. On top of this, the provision of services within the rooms would also require major intervention into the historic fabric and would need to be undertaken on a large scale. The proposed subdivision of the office spaces and intervention into the historic fabric would be contrary to the conservation of this grade I designated heritage asset and therefore not meet the requirement set out in paragraph 193 of the NPPF. Additionally, the harm that would be caused by converting the spaces into hotel rooms has not been accompanied by a clear and convincing justification, a requirement in line with paragraph 194 of the NPPF.

The raised central block of the Customs House and the hierarchy of spaces that this creates in relation to the east and west wings of the building was an intentional design element of Laing's design. This can be clearly seen on the southern, Thames side, elevation and is integral to the aesthetic value of the building. Within the proposed works the applicant is intending to erect two glazed pavilions on the top of the east and west wings of the building. As seen in the proposed southern elevation, this would result in the height of the two flanking wings being level to that of the central block - the addition of the lift overrun to the two wings will extend the height over the ridge of the central block. The addition of two glazed pavilions would cause considerable harm to the architectural interest of Customs House and would alter an integral element of the original design.

Further alterations to the southern elevation include the insertion of doors in the place of the central block's first-floor sash windows. This element of the scheme would alter the historical entry point into the building and would harm the composition of southern elevation by altering the hierarchy of windows. The provision of these doors is in order to allow access onto the riverfront. However, a clear and convincing justification - a requirement of paragraph 194 of the NPPF - for the harm that this element of the scheme would cause is not given.

The erection of the two pavilions would additionally harm the historic fabric of the west block. It is acknowledged in the Heritage Statement that the roofs to the western and central blocks are of largely original construction, however, the construction of the two pavilions will necessitate their removal. This removal of fabric would harm the significance of the building, whilst having the potential to put the structure of the building under threat. Your Local Authority should ensure the applicant provides the necessary information about the structural integrity of the building and whether it has the capacity to accommodate further vertical extensions.

### **Recommendation**

The Group was vocal in pre-application discussions over the need to open up the building to the public and utilise the southern terrace as a public space, whilst increasing the visibility of the southern elevation. Equally important is the conservation of the building and the retention of the most important surviving historic fabric.



The Georgian Group has concerns over the current application on heritage grounds and objects to this application for Listed Building Consent, recommending your Local Authority refuse consent. As referred to above, the proposed works would result in the loss of historic fabric throughout the building in order to accommodate the proposed hotel use. The current office rooms will be subdivided in order to provide en-suite facilities and the erection of two roof pavilions will alter the external appearance and result in the loss of further historic fabric. In summary the application does not meet the requirements of paragraph 192,193,194 and neither the weighting exercise set out in paragraph 196 of the NPPF.

When considering the accumulated harm that the various elements of the scheme would cause, the Group does not believe that the proposed use as a hotel poses the most optimum viable use for the Customs House. Paragraph 192 of the NPPF requires Local Authorities when determining applications to take account of 'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'.

The Group would like to remind your local authority of its obligations in line with section 66 (1) and 72 (1) of the Planning (Listed Building and Conservation Area) Act 1990. Within the Act, it states that special regard should be given to the desirability of preserving a building or its setting; and in reference to conservation areas (section 72), that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

The City of London *Local Plan* states that 'proposals for change from offices will normally be refused if the building or site is considered to be suitable for long-term viable office use' – with this being incorporated within Policy DM 1.1. The Group urges your Local Authority to abide by this policy as the Customs House is suitable for long-term viable office use.

If your authority is minded to grant consent. This application should be referred to the Secretary of State for the reasons outlined within section 3 of ARRANGEMENTS FOR HANDLING HERITAGE APPLICATIONS – NOTIFICATION TO HISTORIC ENGLAND AND NATIONAL AMENITY SOCIETIES AND THE SECRETARY OF STATE (ENGLAND) DIRECTION 2015.

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Your Authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely,

Edward Waller (Conservation Adviser for South East England and London)

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