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**Case Officer**

Jessica Robinson

**Date** 25 March 2022

Dear Sir/Madam

**LONDON CUSTOM HOUSE, LOWER THAMES STREET:  
GEORGIAN GROUP  
Pre-Application Advice**

I write in respect of your recent pre-application submission for proposals at the above site. This letter forms the formal Officer response to the pre-application submissions following the pre-app meetings which took place on 5, 10 and 19 January 2022.

**SUMMARY:**

The proposal for an office-led, mixed-use scheme would likely accord with land use policies in the Development Plan. It would deliver enhanced modern office accommodation with complementary public uses, assisting in the wider strategic objective to animate and activate in an inclusive manner the Thames Policy Area, Thames and Riverside Key City Place and emerging Pool of London Key Area of Change.

It offers an opportunity to conserve and enhance the outstanding heritage significance of the London Custom House, subject to some further detail. Officers consider the current scheme has the potential to be ambitious and transformative. Part of this revival process will require change, some of which will be harmful. Your proposed package of wider public benefits, subject to the advice in this letter, could outweigh the low level of less than substantial harm which would likely be caused. Further information is required to understand the full heritage and archaeological impacts. It is also considered the proposal to restore the original roof and remove detracting clutter which would result

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in residual minor, but welcome, enhancements to strategic London and local views in the LVMF and Protected Views SPD, including of City Landmarks and Skyline Features.

In spatial urban design terms, it would open up a significant piece of the City's riverside walk alongside the Thames Path, where our strategic spatial and detailed policies seek to reinstate genuine and inclusive wider public access. It could provide inclusive public-facing active frontage to the Quayside, including a café and an independent museum. It would open the interiors to public access and which would be animated by complementary exhibition and events spaces as well as heritage interpretation to be realised on agreement of detailed Management and Cultural Plans.

### **PROPOSAL:**

*Restoration of the listed building, and its re-use and adaptation for: Class E(g)(i) office use of the majority of the upper floors; Class E(a-f) uses generally at ground floor level; a museum at ground floor within the west wing; and Class F1 use of the Queen's Warehouse and Long Room. Improved access, including re-creating a historic doorway in the eastern elevation and the Tide Waiters' doorway in the western elevation, installing a disabled access ramp in the north-west corner of the building, and installing a disabled lift at the southern main entrance. Partial deepening of the basement in the east wing to accommodate loading, disabled parking, cycle storage and plant, and altering the existing access ramp to facilitate access. Removing all railings and gates from the quayside and restoration of existing surfaces, widening the Thames Path, and creating a new area of riverside public realm subject to an agreed public access strategy.*

### **LAND USE:**

Custom House currently provides 19,698 sqm GIA of office and ancillary floorspace arranged over basement, ground, mezzanine and 3 upper floors. The area immediately surrounding Custom House is predominantly commercial office use, with event space opposite to the west at Old Billingsgate and residential opposite to the east at Sugar Quay, including several hotels in the area.

The City of London Local Plan 2015 and the Submission Draft City Plan 2036 promote the delivery of a world class business city and the protection and provision of office floorspace. Local Plan policies CS1 and DM1.1 and emerging City Plan 2036 Policies S4 and OF2 seek to protect existing office accommodation. Evidence provided in support of planning applications should consider the potential for the building to meet a variety of office needs including, where appropriate, the potential for sub-division to provide smaller office suites, the potential to provide accommodation suitable for start-ups or 'move-on' accommodation and the potential for comprehensive redevelopment to re-provide office floorspace.

It is proposed to retain the office accommodation in the West and East Blocks and in part of the Centre Block and to keep in office use as flexible serviced office accommodation aimed at SMEs in accordance with emerging City Plan Policy OF2, including at paragraph 5.1.23, which seeks the refurbishment of office floorspace to accommodate future need and find suitable uses for historic buildings which can provide more affordable office stock. We note and welcome your aim to attract a growing demand from media, tech and creative SMEs gravitating towards the City, in accordance with strategic Policy CS 1(3.5) and detailed Policy DM 1.3 (3.1.15) and emerging City Plan Policy

S4(2-3) (and associated paragraphs 5.1.11-13) and detailed Policy OF1, in addition to recent Corporation visions for its post-Covid future contained in 'City Recharged '(2020), 'Future City '(2021) and 'Commerce and Culture: Fuelling Creative Renewal '(2021).

Policy DM 1.5 (mixed uses in commercial areas) encourages a mix of commercial uses in office developments which contribute to the City's economy and character and provide services for its businesses, workers and residents, as proposed. Emerging City Plan Policy OF1(2) and OF2(1) encourages other commercial uses as part of office-led development, in particular at ground and basement levels, where such uses would provide activated streets and vitality. Paragraph 5.1.19, identifies such complementary uses to include retail, leisure, education, health and cultural uses, in particular where these offer the potential for creativity, collaboration and social interaction, as we note you intend.

Local Plan and emerging City Plan Strategic Spatial Policies CS9 (Thames and Riverside) (2; iii) and S17 (Thames Policy Area) (3;3) and S19(1) seek an improved mix of appropriate commercial and cultural uses as part of office-led development, whilst safeguarding heritage assets. Further emerging City Plan Strategic Design and Spatial Policies S8 (Design) and S19 (Pool of London), seek mixed-use office-led buildings, including the provision of retail, cultural and leisure uses which provide for active frontage and which enhance heritage assets and their interpretation. We note, subject to some further information, the proposal could result in the preservation and even enhancement of the Custom House, and its inclusive interpretation, while delivering those complementary commercial and cultural uses sought by policy.

Officers can see in principle how by retaining the existing cellular, but interconnected plan form, a flexible approach to office use and configuration can be facilitated. The implications of the pandemic upon working patterns and office demand have yet to be understood, but Officers acknowledge that increased flexibility is likely to be a central factor in longer term resilience for office use. The variety of smaller and medium sized spaces do provide an appropriate framework upon which to respond to potential post-pandemic demand for smaller individual spaces, as well as for providing further spaces in a 'steppingstone' or hub approach.

It is considered that the proposal for a mixed-use, office-led, and complementary commercial independent retail, leisure and cultural uses, would draw support from the Development Plan. Further to this, a scheme which would also enhance a Grade I listed building and provide better access and interpretation for a range of communities would be supported. The scheme has the potential to deliver a vibrant and active riverside frontage and deliver uses consistent with the appropriate and inclusive activation of the Quayside, on the assumption that an inclusive Management Plan and Cultural Plan should be provided and agreed with Officers to ensure the use of the site is socially and economically inclusive, in accordance with the London Plan Good Growth objectives, GG1-6, London Public Charter and 'Expanding London's Public Realm: Design Guide'.. It is noted that the change of use of the Long Room is above ground floor level, though Officers accept that the principal historic civic spaces are not well suited, in conservation and enhancement terms, to the retention of office and that your proposed complementary uses are more conducive to the inclusive revealing of their heritage significance, drawing support from the wider Development Plan and material considerations.

Overall, it is considered the retention of the majority of original office chambers in office use is welcomed and would deliver an office-led scheme. Wider Development Plan considerations, including strategic design, spatial and heritage policies, could support the change of use of the Queen's Warehouse (basement and ground), Long Room and Robing Room, justifying the loss of office land use matter.

### **HERITAGE:**

Our principal aim regarding heritage is to establish whether the proposals are based upon a good understanding of the significance of this unique building. Officers are also looking to establish whether the basic principles of the proposal are then clearly founded upon that understanding. We also need to establish at this early stage whether elements of the proposals have the potential to cause harm to significance, as part of their effect, so that avoiding that harm, or minimising it through subsequent detailed design development can be achieved. We consider the submission 'light' on the M&E servicing implications, which we need further information on, albeit the direction of travel is positive. Our assessment on these issues is set out below.

#### London Custom House - Understanding of Significance:

A Statement of Significance produced by the Architectural History Practice has been submitted which is a good summation of heritage significance to which we can broadly agree. We would add that we consider it has a latent wider communal/social significance to London and the Nation which is perhaps under-researched and should be better explored, and which could inform your emerging proposals.

It is essential that impact is based on significance. The Corporation considers the overarching outstanding heritage significance derives from:

- 1) **Historic and Architectural Interest:** A strategic CoL and London riparian monument, the former heart of the Pool of London and Port of London, once the busiest port in the world, standing as a unique and intact Georgian riverside ensemble with a strategic relationship with the River Thames which is architectural and historic and inherent in its compositional arrangements in elevation and plan.
- 2) **Architectural and Artistic:** Despite evolution, on the whole, it retains the consistent character of a completed Neo-Classical edifice, inside and out. It is one of London's forefront Neo-Classical monuments, a prominent and seminal work of the renowned Sir Robert Smirke, and the seminal work of the lesser known but influential David Laing, both pupils and prominent exponents of Sir John Soane's Neo-Classical school which came to define a national style at an important moment in British history.
- 3) **Architectural and Historic:** A unique, rare and remarkably intact surviving purpose-built Georgian office-ensemble and of a British/Commonwealth Custom House, comprising the earliest purpose-built offices to survive intact and the longest in continuous use in the CoL. It is the ancestor of the City's prevailing building type and constitutes the 'mothership', which set the precedent for, Custom House's throughout the Nation and Commonwealth.

- 4) Architectural and Historic: The character, plan form and fabric of the Queen's Warehouse, Long Room and Robing Room (in addition to the offices) are unique survivals of Georgian London, whilst demonstrating technological (structural) intrinsic interest stemming from the remarkably intact survival of a structural concept which exhibits conventional Georgian building techniques on a huge scale alongside very early, unique and rare structural experimentation and innovation in the use of structural ironwork and fireproofing, in addition to the use of concrete in the foundations and for underpinning.
- 5) Historic: Lesser explored socio-economic and cultural significance at the genesis of London's emergence as a pre-eminent 'World City' and global trading centre, including the relationship between the public and the River Thames in what was the first piece of riverside open to public promenade in the CoL, perhaps even central London, from 1817.

It is considered that setting makes a considerable contribution to significance and an appreciation of it, in particular that wider riparian setting around the Pool of London, from the River itself, its embankments, piers and bridges.

A more detailed 'deep dive' into significance should be forthcoming which provides a greater understanding of the historic structure and its development, in particular to inform detailed interventions and the final M&E strategy.

### **Impact:**

Overall, the proposal would allow the surviving office accommodation, considered the longest purpose-built offices in the Square Mile to survive intact, and in continuous lawful use for over 200 years, to remain in continuous beneficial use. It is considered that the original office use offers the opportunity to work with the grain, fabric and character of the Custom House.

We welcome your concept, of a mixed-use office-led destination, as consistent with that of the original historic concept, working well with the inherent 'heritage narrative' of the London Custom House, as a place of business and exchange, and which could re-encapsulate its remarkable contribution to London and the Nation as the genesis of the so-called 'World City' of commerce and trade. It is considered that the nature and disposition of the uses shown, subject to some further detail, can be made compatible with the conservation of the asset and beneficial use. In terms of overarching impact on those identified five core elements of significance, Officers consider:

- 1) Architectural and Historic Interest: The proposal seeks to retain, restore, and open the historic quayside to the original volume, retaining and re-using features (historic and later) which reflect the historic function, whilst working with the historic plan form and circulation, reinstating historic permeability and interconnections between interior and Quay. The proposal to restore the original roofscape, removing later clutter, would assist in reinstating the original completed architectural composition in elevation, whilst potential enhancements to the interior in the Long Room, to the external elevations and East Block roof, would assist in restoring the Neo-Classical character in plan. Together the proposals could conserve and enhance the Custom House and Quay as a unique and intact riverside

ensemble and the inherent architectural and historic relationship between this composition and the River Thames.

- 2) Architectural and Artistic: the proposal seeks to reinstate compositional symmetry, proportions and harmony, restoring the completed Neo-Classical composition inherent in elevation and plan, whilst the re-use and restoration of Laing's surviving office ensemble could conserve and enhance it in terms of historic fabric, pattern of use, plan form and character. The proposal could conserve and enhance the building as a seminal example of the works of Robert Smirke and David Laing, and as a strategic Neo-Classical London monument.
- 3) Architectural and Historic: The proposal could retain and restore the unique, rare and intact purpose-built office ensemble, retaining on the whole intact the historic fabric, pattern of use, plan form and character via a sensitive restoration of the original architectural room compositions, hierarchy, proportions, aspects, light and original architectural features, including skirtings, panelling, fireplaces, doors and architraves, screens and cornicing, with the potential insertion of sensitive M&E services.
- 4) Architectural and Historic: the proposals could conserve and enhance the unique characters, plan form and fabric of the Queen's Warehouse, Long Room and Robing Room, via a sensitive scheme of retention and reinstatement of historic plan form and the incorporation of architectural features and character, whilst developing a sensitive M&E strategy along similar lines of that conceived for the West Block which would work with the structural fabric, foundations and underpinnings.
- 5) Historic: further information and significance assessment is required in order to understand the impact here.

Whilst, on the whole, the proposal could conserve and enhance heritage significance, subject to further detail, it is recognised that some harm would be necessary to revive the building, resulting from intervention into historic fabric. Further research and understanding of the historic fabric, for example sub-floor basement structure and floor voids, should be undertaken to refine the M&E strategy.

Harm would result from, for example, the need for localised trimming and bracing of joists and penetration of historic walls and ceilings to receive horizontal and vertical transfer of new M&E, the visual and spatial incursion of ramping and a lift to deliver inclusive access, the need to raise the river wall albeit in a sensitive manner and the potential penetration and obscuring of historic fabric to receive new services in the Queen's Warehouse in particular. Further detail is required, including:

- i) On the M&E servicing strategy for the Queen's Warehouse and Long Room, following the sensitive approach established for the West Block which is underfloor and low level, utilising where possible existing penetrations and vertical riser should as chimney stacks, whilst seeking to re-use historic features and fabric where possible.

- ii) A condition survey and associated schedule of works, which is understood to be forthcoming, which would specify a targeted and scholarly scheme of restoration of the historic office interiors, including paint/surface treatment analysis.
- iii) A strategy for raising the river wall which is architecturally coherent and responds to historic plan form and connections between interior and Quay.
- iv) Further detail on achieving the highest standard of inclusive access consistent with the heritage significance, addressing the advice contained in this letter.

Overall, subject to fully resolving i-iv, Officers consider the outstanding heritage significance of the London Custom House could be preserved in accordance with Local Plan Policies CS 12, DM 12.1 and DM 12.3, London Plan Policy HC1 and emerging City Plan Policies.

#### Other Heritage Assets; In-Direct Impacts on Setting

The removal of the somewhat incidental roof clutter and the restoration of the original roofscape would draw some minor heritage benefits to surrounding designated heritage assets of the highest order. This would result from both the ability to better recognise significance, from removing intrusive elements which screen an asset, and by allowing for a greater appreciation of the asset, by removing incongruous detracting elements and restoring the integrity of the relationship between the Custom House and other strategic heritage assets with which it has group value. It is considered that the proposal would enhance the setting and thereby significance of Tower Bridge (Grade I), the Monument (Grade I and Scheduled Ancient Monument), Old Billingsgate (Grade II), All Hallows by the Tower (Grade I) and St Dunstan in the East (Ruin) (Grade I). In all instances it is thought the benefit would be low but given the importance of the assets this would draw some notable support from section 66 and 16 of the Act, CS 12, DM 12.1 and DM 12.3 and paragraph 199 of the NPPF in support of the proposals.

#### Archaeology:

Custom House is in an area of significant archaeological potential. It is one of the few riverside sites where a sequence of waterfront structures from the Roman to the modern period are likely to survive, some of which are now rare. Proposals should be designed to avoid impact on these features.

An Archaeological Assessment should be undertaken at the earliest pre-application stage. Please contact Kathryn Stubbs to arrange a process and series of meetings in this regard.

#### **STRATEGIC VIEWS (LONDON AND LOCAL)**

##### London View Management Framework (LVMF):

The Custom House is in the following LVMF strategic views:

- 10A.1 Tower Bridge (Upstream), River Prospect;
- 25A1-3 Queen's Walk next to City Hall, Townscape View and;

- 11B.1-2 London Bridge (Downstream), River Prospect

In all the Custom House is identified as contributing to the characteristics of the view in the LVMF SPG. Officers consider it makes a strong aesthetic and cultural contribution to the views as a key element/feature, which is both prominent and a rare and unique surviving example of a Georgian riverside ensemble contributing to a wider appreciation of its essential relationship with the River, appreciated alongside wider strategic riparian features and landmarks. The proposal to restore the original roofscape would enhance this contribution to the characteristics of the view in accordance with London Plan Policy HC4 and Local Plan Policy CS 13(1).

#### The Monument; Views of and From:

*Monument; Views From; View 1 – South East to the Tower of London, Tower Bridge, the River Thames and HMS Belfast:*

The removal of high-level clutter which detracts from the historic roofscape, and its restoration to an original form, would enhance the positive contribution made by the Custom House to the general prospect as an identified notable topographical feature and the group value it shares with Old Billingsgate and Tower Bridge. It would also cause less distraction to the eye and reinforce the historic integrity of the identified vista which leads the eye along the Monument Street axis, via Custom House and Old Billingsgate, towards Tower Bridge and the River Thames (Key Features), enhancing the ability to appreciate them. Views from the Monument would be protected and enhanced in accordance with CS 13(2) and guidance in the Protected Views SPD.

In terms of views of the Monument, those identified and relevant here are from Tower Bridge (LVMF 10A.1) and from Monument Street, in the Protected Views SPD. The removal of high-level clutter, in particular the non-original plant room/lift overrun, visible from 10A.1, would restore the full integrity of the principal river composition of the Custom House. This would protect and enhance an appreciation of these protected views of the Monument from Tower Bridge, removing incongruous foreground features.

The plant room/lift overrun atop the West Block is a visible detractor on the complementary historic skyline backdrop to the Monument on approach on Monument Street from King William Street. Their removal and the restoration of the historic roofscape would remove a detracting element, enhancing an appreciation of the Monument, protecting and enhancing these protected views.

*City Landmarks and Skyline Features; Views Of:*

Tower Bridge is identified as a City Landmark in the Protected Views SPD, whilst All Hallows and St Dunstan in the East are identified as Skyline Features ('City Churches with a Skyline Presence'), views of which should be protected and enhanced under Policy CS12(2).

The proposal would preserve and enhance glimpsed views of Tower Bridge from King William Street/Monument Street and cause less distraction from and enhance an appreciation of it from the Monument Viewing Gallery, thus protecting and enhancing views of it as a City Landmark.



The proposal would better reveal the sky silhouette of All Hallows by the Tower in strategic riparian kinetic views north of the centre of London Bridge, removing incongruous foreground clutter and enhancing an appreciation of the spires group value with Old Billingsgate and the Custom House, thus protecting and enhancing views of it as a Skyline Feature.

The proposal would better reveal the tower and crown spire composition and skyline presence of St Dunstan in the East, removing incongruous foreground clutter in views from the River Thames, South Bank Queen's Walk, and from skyline views on approach from Great Tower Street/St Dunstan's Hill. It would restore the historic roofscape and allow a better appreciation of the architectural and historic (associative) group value between the Custom House and St Dunstan in the East, thus protecting and enhancing views of it as a Skyline Feature.

Overall, the proposal would protect and enhance views of historic City Landmarks and Skyline Features, and the substantial contribution these make to the overall heritage of the City, in accordance with CS 13(2).

### **GOOD GROWTH BY DESIGN:**

#### Detailed Design: Appearance:

As discussed, we understand that your objective is the sensitive and scholarly restoration of the London Custom House, a Grade I listed building and designated heritage asset of the highest order. It is correct and proper that this significance has dictated the design approach.

To that extent, your high-level proposals for targeted external alteration and restoration, based on a proper understanding of heritage significance, are both justified and limited. Subject to forthcoming detail, these could be well designed, having regard for local history and character, and could accord with adopted and emerging strategic design Policies CS 10 and S8 and adopted and emerging detailed design Policies DM 10.1 and DE2 and I1 of the National Design Guide, in particular in that they would restore historic significance, better visually integrate the roof into the overall design, would fully screen exposed plant from view and would take opportunities to enhance the roofscape as a whole.

Careful thought should be given for the raising of the River Wall in-situ, which is considered the optimal solution to a difficult issue. The new wall should be i.) architecturally literate and ii.) avoid it becoming a monotonous impermeable feature which detracts from the historic ebb-and-flow between the interior and Quay. For example, design options could be explored which utilised the wall as an active raised river terrace with access to original/reinstated historic entrances to the interior, whilst still allowing for some light to permeate the basement.

The interventions and alterations, subject to detail, could constitute a high standard of design in accordance with the NPPF, Local Plan Policies CS 10 and DM 10.1 and emerging Policies S8

#### Urban Design:

The NPPF deems good design, including high quality, beautiful and sustainable buildings, as fundamental to the planning process and sustainable development (para 126). The relevant London

Plan design Policies D3, D5 and D8 are underpinned by the 'Good Growth' objectives, GG1-6, which dictate that sustainable development in the Capital is growth which by-design is socially and economically inclusive. Further relevant detailed design guidance is contained in the City's Public Realm SPD and associated Technical Manual, and relevant documents in the Mayor's 'Good Growth by Design' series, in particular 'Expanding London's Public Realm: Design Guide' (2020), 'Public London Charter' (2021), 'Making London Child-Friendly' (2020) and the Accessible London SPG (2014).

The London Plan (Policy D8) states that where new public realm is created it shall maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter.

In terms of strategic spatial policy vision, the CoL's position is long established and clear. It is encapsulated in Local Plan Policy CS 9, emerging City Plan Policy S17 and S19 and adopted guidance in the Riverside Walk Enhancement Strategy SPD (Riverside SPD) and the CoL's Lighting Strategy. These seek to ensure sites contribute to the aims of the Riverside Walk Enhancement Strategy through improving public access and river views and improving vibrancy via mixed office-led use, including cultural, leisure and retail uses providing active frontage to the River, publicly accessible roof terraces, bringing heritage to more diverse communities and providing culture, arts and play in pedestrianised spaces for all. The use and enjoyment of the River Thames, open and accessible to all in accordance with GG1, is a core function of the CAZ under London Plan Policy SD4.

We note that you propose public realm across the interior and exterior quayside, which is welcomed. Internally, this would comprise ii.) circulation corridors in the West, Centre and East Blocks, the main lobby and stairs, and the Long Room Lobby. On the Quayside we note that you proposed full unfettered public access over land adjacent to Old Billingsgate, Water Lane and within c5m of the river edge. The remainder of the Quayside is subdivided into Zones A and B, with the potential to host temporary F&B temporary structures along the flood wall (Zone A) and in the remainder, Zone B, whilst being mainly unfettered public access, that could host occasional temporary events such as markets, exhibitions or pop-ups, with clear pathways across and through to be defined in a management plan.

It is considered that the pre-application proposal for new areas of public realm, both internal and external, sets the appropriate principles for an inclusive form of public realm which could constitute 'Good Growth'. To accord with our strategic spatial and detailed policy framework it is anticipated that:

- Those internal spaces shown as open to public access, in a manner stated as consistent with that at Somerset House or the Southbank Centre, is the subject of a Management Plan minimising the rules governing access and free to enter to ensure the public access is inclusive. That Management Plan should include details of active management and curation in accordance with guidance in 'Expanding London's Public Realm: Design Guide', including, for example, commitments to occupier 'blind' seating, discreet security and active public curation (see below) to allow internal spaces such as the main lobby, stairs and Long Room Lobby to be managed in a neutral way which allows a communal ownership and sense of a shared space.

- Provide a Cultural Plan, committed to securing an independent Cultural/Heritage Partner, who should be independent from the developer and appointed in consultation with the CoL. The Cultural/heritage partner should be appointed to curate and oversee the day-to-day running of the proposed museum and have access to curating and programming of the various public spaces, including the main lobby, Queen's Warehouse, Long Room Lobby, Long Room, Robing Room and the Quayside. This would be secured via legal agreement, with a commitment to reach diverse audiences via various media and be socially and economically inclusive. The proposed scheme would begin to optimise active frontages through the reinstatement of the (potentially) lost Laing entrances servicing the Quayside and provide active public uses in the form of a museum and a café/retail on the southern elevation, to complement the active frontage which could be provided by the Queen's Warehouse gallery and events space, and we note you intend to do this.
- A Landscaping Strategy which maximises unfettered public access to the external Quayside, incorporating integral public seating, diverse play and exercise equipment, water fountains and sensitive light/sound installations, with the potential to host public art and other low-key wider public events, in a manner which would deliver a space for all, accommodating the needs of a diverse demographic.

In summary, Officers are pleased with the direction of travel in relation to the urban design approach which, subject to our advice above, could comprise an inclusive form of development and be in accordance with adopted and emerging Policies CS 10, DM 10.1, S8, S17, S19, D3, D5 and D8 and policies and guidance contained in the NPPF and National Design Guide, 'Expanding London's Public Realm: Design Guide', the Public London Charter and 'Making London Child Friendly'.

#### Inclusive Accessibility:

We note your intention to optimise accessibility in accordance with the constraints of the Grade I listed building, and London Plan Policy D5 which requires the highest level of inclusive and accessible design. Our observations are as follows:

- Step free access, via a ramp, from Lower Thames Street and land adjacent to Old Billingsgate Walk is welcomed, and it would be useful to discuss options to the entrance on Water Lane. Depending on the feasibility of achieving step-free elsewhere, having consideration for wider constraints, we would need to agree a management strategy ensuring inclusive access is as convenient and seamless as possible to the various uses and parts of the building.
- It is considered that x2 step-free lifts should be provided giving access to the Queen's Warehouse from the Quay. These should be sensitively incorporated behind the raised River Wall to reduce the visual and physical impact on the openness of the original Quay.
- A light touch development is proposed, and it is unclear whether there would be any internal level changes, or whether any mitigations would be required to improve the accessibility of existing design features such as narrow corridors and heavy or narrow doors, having consideration for wider constraints. For example, is it proposed to remove

the existing steps in the N corridor of the West Block basement, as currently these are unacceptable in inclusive access terms.

- It is pleasing to note that WC provision would be improved and that wheelchair-accessible WC's would be provided in each wing on all floors.
- Due to the public amenity elements of the proposal, consideration should be given to the provision of a Changing Places (Approved Document M Volume 2 5.7e). Changing Places are designed for use by people with complex and multiple impairments who require assisted help, they are not designed for the use of independent wheelchair users (Approved Document M Volume 2 5.6 and BS8300- 2:2018 18.6). These would need to be convenient and sufficient to allow access to the variety of end users to access with dignity and without segregation.
- It is noted on page 8 of the report that one lift would be designated for fire brigade and on page 9 the fire strategy refers to the use of staircases for evacuation. However, the London Plan Policy D5 states the importance of safe and dignified emergency evacuation for all building users, "In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building."
- 5% of cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. Larger cycles, such as tricycles, handcycles and recumbent cycles which can be up to 1.2m wide (Department for Transport Cycle Infrastructure Design LTN 1/20 5.4.1). Wheelchair-accessible sanitary and changing facilities would also be required.
- Two on-street designated blue badge parking bays are proposed on the pavement to the west of Custom House. The proposed location is unacceptable as it would block the pavement and the adjacent existing cobbled carriageway would not be a suitable surface for many pedestrians.

A number of the current arrival experiences at the building are difficult from an access perspective, involving dropped kerbs and difficult surface treatment, and anticipate discussion around detailed public realm access enhancements. We would recommend that you seek the early engagement of a specialist access consultant to ensure the design of this scheme evolved in a way where accessibility is designed into the scheme from the outset.

### Sustainable Design; Carbon

Further detail is required albeit we note your intention to optimise sustainability in accordance with the conservation of the asset, which is appropriate, and your aim to achieve BREEAM 'Excellent'. A Sustainability Assessment should be detailing your approach and all relevant London Plan requires are met.

### Urban Greening:

We note your claim this is to yet resolved at this stage. Our anticipation is that green infrastructure be optimised in accordance with the Development Plan, taking a holistic approach. Officers note your intention to work with the row of trees, planted at the request of the

Metropolitan Gardens Association in 1904, which are out to consultation on a Tree Preservation Order.

It is recognised that the evident site constraints and planning balance mean the Urban Greening Factor (UGF) is unlikely to be met. Officers note and welcome the early exploration to optimise, exploring additional tree planting on Lower Thames Street (on the wider pavement affording a setting to the Centre Block) and on Water Lane, the potential for a living green wall on the party wall between Custom House and Old Billingsgate Walk and where possible as part of new public seating on the reinstated Quay. Officers consider this could allow for sufficient optimisation, having regard for the otherwise sensitive restoration of the Custom House proposed.

### **RESIDENTIAL AMENITY:**

The proposal would result in the loss of 'open air' M&E plant and associated servicing access routes on the roof of the East Block which are prominent from the flats at Sugar Quay opposite. Drawings reveal most of the fenestration, including terraces, on the W elevation of Sugar Quay are a range of habitable rooms comprising kitchen/living spaces and bedrooms. The proposal lid over and conceal a new plant space. This would reduce the potential for the overlooking of the flats opposite, while improving their outlook, and the potential for more efficient (and quieter) modern plant could also reduce the potential for noise and disturbance, which is welcomed. A Noise Assessment would need to be provided demonstrating this.

Retaining the servicing bay in proximity to the residential entrance of Sugar Quay on Water Lane harbours the potential for impact on general residential amenity, including noise and disturbance, subject to the servicing strategy.

Officers require a servicing and deliveries plan and additional information to understand the impact of servicing the building. We note your commitment to off-street and off-peak servicing, the principle of no servicing from the quayside (except in exceptional circumstances which are prior agreed), and that you would seek to optimise consolidation to reduce servicing movements, which is welcomed.

A noise impact assessment would be required if an application were to be brought forwards. This would need to include an assessment of the development and any potential impacts from the building or any activation of the external areas, including any terraces, on nearby noise sensitive receptors, especially those residential buildings adjacent to the site.

### **SUSTAINABLE TRANSPORTATION:**

Despite the lack of detail, we note the schemes intention to achieve compliance with the City's and Mayor's Transport Strategies, following the 'Healthy Streets' approach and modal hierarchy contained therein, and deliver in full on London Plan standards.

The provision of adequate off-street servicing and a managed delivery and service plan will be critical in determining the suitability for the proposed uses. As discussed, access for vehicles on the Quayside will be resisted and it is expected that the capacity of the servicing bay will need to be demonstrably sufficient to accommodate the building servicing in addition to any servicing of

quayside events. A Transportation Assessment is required for us to make a full assessment. However, we welcome a commitment to off-street, off-peak servicing to seek a consolidation strategy which would avoid servicing vehicles using the Quayside.

In accordance with the modal hierarchy and want to achieve pedestrian priority, the x2 disabled parking bays proposed to be provided on Water Lane should be relocated to the basement of the East Block.

**FLOOD RISK:**

The Custom House is in the City Flood Risk Area in the Local Plan. The site is vulnerable to flooding from the tidal Thames including from sea level rise, surface water flooding and sewer discharge flood risk.

In order to protect London from sea level rise the local flood defence structures along the riverside will need to be raised by 0.5m by 2065 and 1m by 2100. The raising of the River Wall should be done sensitively, accounting for the sensitive heritage setting. It is considered that raising the River Wall in, there or thereabouts, the current position in an architecturally literate manner is the optimal solution. Thought should be given as to how step-free lift access could be integrated into the river wall in a sensitive manner.

A proposal must be accompanied by a full Flood Risk Assessment having account for the various flood risks identified in the City of London Strategic Flood Risk Assessment.

**CONCLUSION:**

The principle of an office-led regeneration of the Custom House is supported. That regeneration need be inclusive, as set out in this letter, creating as mixed-use destination at the heart of the Pool of London Key Area of Change. Further detail is required as to the impact of, on the whole, necessary intervention, including the sensitive incorporation of building services. Heritage harm could be outweighed by the wider public benefits, subject to that detail.

Yours faithfully,

Development Division