



Planning Applications Sub-Committee

Date: TUESDAY, 13 DECEMBER 2022

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

Deputy Shравan Joshi (Chairman)	Deputy Edward Lord
Deputy Alastair Moss (Deputy Chairman)	Alderman Ian David Luder
Deputy Randall Anderson	Antony Manchester
Brendan Barns	Alderman Bronek Masojada
Emily Benn	Andrew Mayer
Ian Bishop-Laggett	Deputy Brian Mooney
Deputy Keith Bottomley	Deborah Oliver
Deputy Michael Cassidy	Deputy Graham Packham
John Edwards	Alderwoman Susan Pearson
Anthony David Fitzpatrick	Judith Pleasance
Deputy John Fletcher	Deputy Henry Pollard
Deputy Marianne Fredericks	Ian Seaton
Martha Grekos	Alethea Silk
Jaspreet Hodgson	Luis Felipe Tilleria
Amy Horscroft	Shailendra Kumar Kantilal Umradia
Alderman and Sheriff Alastair King DL	William Upton KC
Deputy Natasha Maria Cabrera Lloyd-Owen	Alderman Sir David Wootton

Enquiries: Gemma Stokley
gemma.stokley@cityoflondon.gov.uk

Accessing the virtual public meeting

Members of the public can observe this public meeting at the below link:

<https://youtu.be/GMH0bOG56Yo>

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one civic year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

Lunch will be served in the Guildhall Club at 1pm

John Barradell
Town Clerk and Chief Executive

AGENDA

NB: Certain matters for information have been marked * and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting. These information items have been collated in a supplementary agenda pack and circulated separately.

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To agree the public minutes and summary of the Planning Applications Sub-Committee meeting held on 22 November 2022.

For Decision
(Pages 5 - 20)

4. **IBEX HOUSE 42 - 47 MINORIES LONDON EC3N 1DY**

Report of the Planning & Development Director.

For Decision
(Pages 21 - 178)

5. **IBEX HOUSE 42 - 47 MINORIES LONDON EC3N 1DY - LISTED BUILDING CONSENT**

Report of the Planning & Development Director.

For Decision
(Pages 179 - 190)

6. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT***

Report of the Planning and Development Director.

For Information

7. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR***

Report of the Planning and Development Director.

For Information

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

9. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

PLANNING APPLICATIONS SUB-COMMITTEE Tuesday, 22 November 2022

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 22 November 2022 at 10.30 am

Present

Members:

Deputy Shravan Joshi (Chairman)
Deputy Alastair Moss (Deputy Chairman)
Brendan Barns
Ian Bishop-Laggett
Deputy Michael Cassidy
John Edwards
Deputy John Fletcher
Deputy Marianne Fredericks
Jaspreet Hodgson
Alderman Bronek Masojada
Deputy Brian Mooney
Deborah Oliver
Deputy Graham Packham
Ian Seaton
Alethea Silk
William Upton KC

Officers:

Gemma Stokley	- Town Clerk's Department
Tim Fletcher	- Media Officer
Fleur Francis	- Comptroller and City Solicitor's Department
Gemma Delves	- Planning and Development Director
Gwyn Richards	- Director, Environment Department
Juliemma McLoughlin	- Environment Department
David Horkan	- Environment Department
Rob McNicol	- Environment Department
Gwyn Richards	- Environment Department
Tom Nancollas	- Environment Department
Iain Steele	- Environment Department
Robin Whitehouse	- Environment Department

Also In attendance:

Ben Sturdy – West Smithfield resident
Sharon Ament – Director, Museum of London
Paul Williams – Principal Director, Stanton William Architects

1. APOLOGIES

Apologies for absence were received from Deputy Randall Anderson, Emily Benn, Deputy Keith Bottomley, Anthony Fitzpatrick, Martha Grekos, Alderman

and Sheriff King, Deputy Edward Lord, Deputy Natasha Lloyd-Owen, Alderman Ian Luder, Alderwoman Susan Pearson, Judith Pleasance, Deputy Henry Pollard, Shailendra Umrada and Alderman Sir David Wootton.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

The Town Clerk reported that the vast majority of apologies reported today (for Deputy Randall Anderson, Deputy Keith Bottomley, Martha Grekos, Deputy Edward Lord, Alderman Ian Luder, Judith Pleasance and Alderman Sir David Wootton) had been received in light of the required separation of functions between an authority in its capacity as an applicant for planning permission, and an authority in its capacity as local planning authority. She reported that the City's Capital Buildings Board and the Museum of London Board had responsibility for promoting the proposals that were the subject of the application to be considered today. Therefore, Members of those Boards (as those listed above were) should not, if also on this Sub-Committee, participate in the decision on this matter and had recused themselves for this reason.

3. **MINUTES**

The Sub-Committee received the public minutes of the Planning and Transportation Committee meeting held on 1 November 2022.

The Chairman highlighted that, as these were minutes of the Grand Committee, they would be officially signed off by the next meeting of that scheduled for 10 January 2023 but were here today for information.

MATTERS ARISING

CRIPPLEGATE HOUSE 1 GOLDEN LANE LONDON EC1Y 0RR (pages 7-29) –

A Member questioned why the comment made as to etiquette and the conduct of debate at the last meeting had not been minuted. The Chairman highlighted that this had also been raised in advance by another Member via email. He highlighted that the purpose of the minutes was to record matters that were pertinent to or impacted upon the decision reached and that they were not designed to be a verbatim record of the meeting. However, he stated that if the Committee were of the strong opinion that this comment ought to also be articulated in the minutes then he was happy to discuss this and the appropriate form of wording for this. The Member commented that she was of the view that, in this instance, the comment ought to feature.

At the invitation of the Chairman, the Town Clerk highlighted that the entirety of the public session of the last meeting had been recorded and was therefore available on the City's webpages.

Some Members made the general point that the minutes of these meetings ought to be reduced as opposed to expanded further given that they were already 35 pages long in this particular instance.

22 Bishopsgate (page 7) – In response to a question regarding the trees at 22 Bishopsgate, the Planning and Development Director reported that he had been made aware that the trees that were part of the approved scheme here had unfortunately and, quite unusually, failed. He added that the original

landscape architects were now undertaking a very detailed assessment as to the reasons for the failure which would precede the replanting of the trees in this location.

RECEIVED.

4. POULTRY MARKET AND GENERAL MARKET AND THE ANNEXE BUILDINGS WEST SMITHFIELD LONDON EC1A 9PS

The Sub-Committee considered a report of the Planning and Development Director regarding the Poultry Market And General Market And The Annexe Buildings West Smithfield London EC1A 9PS, specifically:

General Market

Partial demolition, repair, refurbishment and extension of the existing building known as the General Market at 43 Farringdon Street on the basement, ground, first and roof levels; creation of a new entrance structure on West Poultry Avenue (and associated refurbishment of the existing canopy over West Poultry Avenue) with new facades to West Smithfield and Charterhouse Street; new entrances on the corner of Farringdon Street and Charterhouse Street; Change of use to provide a museum and ancillary uses and areas, together with a flexible retail, restaurant, drinking establishment and leisure (gym) use for the perimeter 'houses'.

Poultry Market

Partial demolition, repair, refurbishment and alteration of the existing building known as the Poultry Market, Charterhouse Street at basement, ground and first levels; change of use to a museum and ancillary uses and areas.

Annexe Site (Red House, Iron Mountain, Fish Market and Engine House)

Partial demolition, refurbishment and extension of the existing buildings known as the Annexe Site at 25 Snow Hill and 29 Smithfield Street at basement, ground, first, second and third levels; creation of a triple height canopy above a public realm space; change of use to a flexible museum, offices, retail, restaurant, drinking establishment, events and functions use. Refurbishment of and minor alterations to the existing building known as the Engine House at West Smithfield at basement and ground levels; Change of use to a flexible retail and museum use. (The proposal would provide 32,864sq.m of Museum floorspace (Class D1), 4,079 sq.m of flexible A1/A2/A3/A4/B1/D1 & D2 floorspace, 2,377sq.m of flexible B1/D1 floorspace, 870sq.m of flexible A3/A4/D1 & D2 floorspace, 18sq.m of flexible A1/D1 floorspace and 82sq.m of flexible A1/A3/A4/D1 floorspace.)

The Town Clerk introduced the item stating that both this and the related Listed Building Consent report at Agenda Item 5 would be considered in tandem. She added that, in addition to the agenda pack, Members would have also received a copy of the Officer presentation slides and an addendum.

Officers presented the application, underlining that it related to the western most buildings of the Smithfield Market complex and that, of note, were the operational East and West markets directly to the east of the site which, as a whole, comprised the General Market, East and West Poultry Avenue, the Poultry Market and the Annexe site. Members were reminded that the site was situated within the Smithfield Conservation Area and that the Poultry Market was in operation in

market use with the General Market and Annexe sites now vacant as had been the case for a number of years.

The Sub-Committee were shown an aerial-view image of the site taken in 2019. It was reported that, at present, the General Market and Annexe site had hoardings and scaffolding around them as repair and restoration works were being undertaken here. As the report indicated, some of the works had planning permission and some were permitted development. An aerial view image of the proposed scheme was shared depicting the conversion of the General Market and Poultry Market to a new site for the Museum of London. It was proposed that the two buildings would be joined by an enclosure along West Poultry Avenue. The Annexe site would be refurbished, repaired and extended and converted to flexible retail, leisure and office uses. Officers commented that many would already be familiar with the site and scheme set out here given that it was considered by the Planning and Transportation Committee in 2020 when Members resolved to grant planning permission and listed building consent. However, due to the delays around obtaining vacant possession of the Poultry Market and issues around the Museum obtaining an interest in the site, the decision was never issued. The scheme was now therefore brought back to Members with the application documentation updated to reflect changes in policy and material considerations since the scheme was last considered – most notably, the adoption of the London Plan. It was reported that the Museum had also taken this time to refine the design of the scheme and some minor design revisions were now proposed. That being said, the scheme still remained fundamentally the same as that considered in 2020.

Officers took the Sub-Committee through an overview of the scheme. Ground floor plans were shown which showed that the new museum had a number of entrances making for a permeable and accessible ground floor plane. The primary entrances would be via the new West Poultry Avenue enclosure, with secondary entrances on Harts Corner, West Smithfield and East Poultry Avenue. The General Market would be serviced via the existing ramp on Snow Hill, with some secondary servicing being undertaken from Charterhouse Street. The Poultry Market would be serviced via the existing loading bay on the north side of the site and the Annexe site would be serviced on-street. A package of 278 works would be needed in conjunction with the scheme to make it acceptable in Highway terms – Officers clarified that this would include works such as footway widening, the provision of coach drop offs and alterations to loading bays. It was reported that the scheme had been designed to function alongside a working market on the basis that the Museum would primarily function during the day, and the market would operate overnight. The loading bays would therefore be available for the market to use overnight. It was reported that the Market Superintendent had reviewed the details and had confirmed that a feasible arrangement was being proposed.

Officers went on to refer to a letter of representation received from a local resident which raised concern as to the construction, the impacts of the proposal upon market traffic. It was highlighted that the temporary impacts of construction would be managed through a Construction Logistics Plan and an Environmental Management Plan which would be secured via condition.

The Committee were then told the details in respect of each building. Officers reported that the scheme was based on renewal, restoration and conservation of

as much of the existing fabric of the buildings as possible, although, inevitably, in bringing these buildings into modern use and up to modern standards, the proposals did result in some harm to the Poultry Market as a Grade II listed building and the Smithfield Conservation Area as well as designated heritage assets and also some harm to the significance of the General Market and parts of the Annexe site as non-designated heritage assets. That being said, the Committee papers conclude that the harm to this significance is decisively outweighed by the public benefits of the scheme.

Members were shown existing and proposed visuals of the General Market where floorplans depicted that the form of the buildings would be retained as part of the proposal. The former central market space would be used as gallery space and an engagement area with the 'houses' around the perimeter of the ground floor also retained and retained – some for museum use and some for commercial use as flexible retail, office or leisure uses. At basement level, more permanent gallery space would be provided in addition to some back of house facilities. At roof level, some flat roof areas would be created in order to enable the formation of a green roof to accommodate PV panels and roof plant. Although some greening would be provided on this part of the scheme, as a whole the scheme would not meet the 0.3 Urban Greening Factor requirement, but this was accepted given that the developer was working within the constraints of these historic buildings. Next, the Committee were shown images of the existing and proposed elevations, with Officers reporting that, at present, the site was made up of a relatively eclectic mix of shop fronts. Some shop fronts would be retained as part of the proposals with others replaced with new display windows inserted to showcase some of the Museum's collections. Officers reported that, as part of the 2022 updates to the proposal, some minor revisions had been made to these shopfronts. It was also highlighted that canopies would be added to the shop fronts as a unifying feature. Members were next shown some proposed visuals of the ground floor level where visitors would continue to be able to appreciate the domed roof alongside many of the historic features of the building which were to be retained. Of particular note here would be the reuse of the Lockhart's Cocoa Rooms. At basement level, the vaulted brick arches would be retained to showcase the Museum's collections and, of particular interest here, would be the insertion of a window at basement level so that visitors could view the trains running adjacent to this area.

With regard to the West Poultry Avenue enclosure, Officers reported that, in order to create this, West Poultry Avenue would need to be Stopped Up. Members were shown a proposed visual of the new entrance featuring an LED screen above this. As part of the permission, it would be recommended that an Access Management Plan is secured to secure access through this route even for those not visiting the Museum. The route would also be curated with Museum artefacts embedded within the floor – a unique offer for the City.

With regard to the Poultry Market, Officers acknowledged that the agenda papers set out that the scheme was contrary to Policy CS5 of the Local Plan which sought to support the continued presence of Smithfield Market. It was reported that there were some facilities within the Poultry Market which support the function of the East and West Markets such as waste storage and animal by-product facilities. These would all be relocated to ensure that the East and West Markets could continue to function, and this would be secured via a Grampian condition. A proposed ground floor plan of the Poultry Market showed that the site would be

used to accommodate the Museum's temporary gallery space which would be a very important part of the Museum's offer. On the north side of the site, the existing loading bay would be used for servicing, and, on the south, an education and schools' area would be created to enable the Museum to realise its aspiration of engaging with every school child in London. Long-stay cycle parking would be provided within the Poultry Market for the Poultry Market and General Market, and this would have its own separate entrance off of East Poultry Avenue. The proposed basement plans showed that the area would be used for stores and back of house areas. A new temporary gallery space would be introduced at first floor level with the area around the perimeter of this being used for research and back of house Museum functions. The ground floor of the Poultry Market (which sloped at present) would be removed and replaced by a flat ground floor level allowing for the insertion of the proposed first floor gallery space. The existing and proposed elevations of the building depicted that, overall, there was minimal intervention. The clear story glazing would be replaced in order to enable the building to be naturally ventilated. It would be secured by a condition stipulating that the replacement glazing was as closely matched as possible to the existing offering in terms of appearance. The Committee were informed that, as part of the 2022 design updates, some of the ground floor entrances had been rationalised to enable even more of the fabric of the existing building to be retained. Visuals of the proposal here illustrated how visitors would still get to appreciate the domed roof from the new first floor gallery space with Officers commenting that the domed roof was one of the most significant aspects of the listed building.

With reference to the Annexe site, Officers reported that this was currently made up of Horace Jones' Fish Market, the 1960's Iron Mountain storage facility, the Victorian Red House (a former cold store) and the Engine House. At basement level here, cycle parking would be provided with the Annexe converted for flexible retail, leisure and office uses. At ground floor, of particular note was the proposed removal of the Iron Mountain storage facility which would have a positive impact on the Smithfield Conservation Area given that it was of no architectural or historical importance. This would be replaced by a new, covered, public realm area. A new extension (a contemporary yet subservient addition to the building) was being proposed over the Red House in association with which new external terrace areas would be formed. The extension would be used for flexible office and leisure use. Visuals of the proposed elevation showed that new windows would be inserted into the Red House façade which was considered to cause some harm on the Red House but it would be ensured that the windows and the detailing had the effect of minimising impact. Officers highlighted that, as part of the 2022 design revisions, some changes had been made to the ground floor of the Annexe site, again, in an attempt to try and retain as much of the existing historic fabric as possible. The lift overrun on the Engine House had also been increased in size slightly although it was proposed that this would be largely screened by greening.

With regard to the proposed public realm around the site, Officers reported that consideration had been given to thermal comfort, wind and daylight/sunlight and all of these had been considered acceptable.

To conclude, Officers stated that it was considered that this scheme represented a unique opportunity to regenerate and revitalise these historic buildings that sat within the Culture Mile. The scheme would also deliver a number of economic,

environmental and social benefits and it was recommended that the planning permission and listed building consent were granted.

The Town Clerk welcomed Mr Ben Sturdy, a West Smithfield resident, to the meeting and asked that he now address the Committee having registered a representation in opposition to the scheme.

Mr Sturdy clarified that his representation concerned a traffic management issue. He reported that work at the new Museum site was restricting Market loading bays causing intensive, illegal use of the double yellow lines along 4-8 West Smithfield by Market HGVs. He added that the partial collapse of East Poultry Avenue and pavement layout changes had already restricted Market loading bays. Post lockdown Christmas 2020 traffic management by the Market demonstrated that the double yellow issue was preventable but these enabling resources were only deployed for one month at this time. Mr Sturdy remarked that the Market Superintendent had called West Smithfield and East Poultry Avenue a 'pinch point' and had given him assurances that the double yellow lines would be dealt with by himself and his officers. However, their measures were unfortunately ignored by Market HGV and forklift drivers who had been verbally abusive and even threatened violence when asked not to use the double yellow lines. Mr Sturdy shared photographic images of the issue showing recent examples of sustained parking by market HGVs. Mr Sturdy also referred to a female traffic warden having been shouted at by a market officer and market HGV driver over a legitimate parking enforcement offence. He commented that the Parking Enforcement Office and local parking wardens had reported that they were now ordered by the Highways Department not to issue tickets to Market HGVs parking on these double yellow lines specifically contrary to the Department having written to him to state that parking on them for more than ten minutes was an offence if not unloading and that this should be for no longer than forty minutes at a time. Mr Sturdy reported that, currently, the double yellow lines were used in heavy rotation by Market HGVs to park and then unload with individual HGVs sometimes parking here for up to eight hours. He highlighted that the problem occurred from as early as 2-3pm, continuing until 6am Sunday – Thursday. He went on to state that 2-3 often parked on the lines simultaneously causing a serious pinch point of congestion. Since Market HGVs will also be parked in the legitimate loading bays opposite, manoeuvring was slowed causing further congestion. Mr Sturdy also referred to the fact that the aggregate noise, vibration and pollution from all of this was an extreme nuisance. He mentioned that parked Market HGVs frequently entered 'defrost' mode where the level of noise nuisance was equivalent to an HGV accelerating for a sustained period – something that was audible and frequently interrupted sleep even from his own double-glazed bedroom at the rear of the building. He described the situation as a breach of the Environmental Protection Act 1990. Mr Sturdy attested that, according to an official surveyor for Smithfield Market and an engineer that he had spoken with, the recent part-collapse of East Poultry Avenue tunnel and failure of parts of the glass canopy surrounding the central Market were caused by Market HGV vibrations. He went on to state that he suspected that these had also contributed to the collapse of the concrete ceiling tiles under the pedestrian bridge by Barbican Station. He added that the Victorian buildings alongside the double yellow lines in question were part of the Smithfield Conservation Area and not designed to deal with these stresses and reported that several cracks had begun to show in both the shopfront glass and pavement glass vault lights within his own building in recent years.

Mr Sturdy highlighted that the December 2019 issue of City View magazine described the very serious, newly discovered links between vehicle caused air pollution and health. He reported that the kerb alongside these double yellow lines was marked with yellow chevrons which prohibit unloading at any time. Yet the Highways Department had now informed him that these now faded markings were not in the current traffic plan. Mr Sturdy underlined that he had attempted to identify when and how this decision had been made but was yet to receive a response.

In summary, Mr Sturdy stated that the loss of Market loading bays due to works required for the new Museum of London was causing unsustainable pressure on the double yellow lines by Market HGVs. He added that this representation urged that this material consideration was examined with a traffic management solution added to the planning application.

The Chairman thanked Mr Sturdy for his contributions and invited any questions that the Committee may now have of him. The Chairman began by acknowledging that this was a serious matter and suggested that a meeting be held between Mr Sturdy and officers to discuss this important traffic management piece. Mr Sturdy responded to state that, whilst he would welcome the meeting, he had been given various assurances in the past with no sustained outcome/improvement of any kind.

A Member, also the current Chairman of the Streets and Walkways Sub-Committee, expressed concern at what had been reported here. He suggested that his Sub-Committee therefore be tasked with looking into this matter in greater detail. The Chairman agreed with this approach and asked that a report be brought to a future meeting of the Sub-Committee.

Another Member stated that she would like this matter explored in further detail, particularly around understanding how the City's processes were working in terms of when these matters were reported.

A Member commented that, ultimately, this underlined the importance of moving the Market from the centre of London.

Mr Sturdy stated that this was not solely about noise disturbance but also very much about pollution levels in such close proximity to residential buildings and also about vibrations. He added that he had resided here for over twenty years now and regularly used the market and was not therefore against its operation per se. He also commented that he felt that the proposed scheme was, architecturally, very impressive.

The Town Clerk welcomed those speaking in support of the application – Ms Sharon Ament, Director of the Museum of London and Mr Paul Williams, Principal Director of Stanton William Architects.

Ms Ament began by clarifying that the Museum would be very happy to work with Mr Sturdy to see if they could help ameliorate the situation at all in relation to the site construction. The Committee were informed that there were a number of others present to respond to any questions that they might have on the revised proposals presented today including Alex Shaw, Director of the new

Museum project, Emma Lally from Momentum Transport, Andy Sedgwick from Arup and Jeremy Randall from Gerald Eve. Ms Ament reiterated that this proposal sought approval for minor amendments to the previously agreed planning application. She went on to report that the Museum had now reached many important milestones in relation to this site, not least the stabilisation of the fabric of these historic buildings that had saved the site from disrepair. Ms Ament also took the opportunity to restate the vision for the project and how this related to the City Corporation's own ambitions. She underlined that this was not just about relocation but was a total reimagination of what the Museum could be, making it totally fit for society in a post-COVID world. She underlined that this was the Capital's only Museum properly dedicated to London and that this represented a once in a generation opportunity to create a truly world-class destination that told the story of London – a global, capital City. Whilst the Museum had done everything it could at its current London Wall site since opening its doors in 1976, this project would really set a new benchmark and be a project for all Londoners.

The proposals would offer visitors a better sense of arrival and large-scale exhibitions in collaboration with other international museums. They would also feed the urge of those living, working and visiting the capital to learn more about the City. In this vein, the Museum would embody the City Corporation's Culture Mile and Destination City aspirations, seeking to enhance the Square Mile's leisure offer to ensure that the City of London remains a hugely attractive place to invest, work, live, learn and visit long into the future. Culturally, the Museum aspired to become one of London's top ten visitor destinations and to support the growth of curators, artists and small businesses. Economically, the Museum Masterplan was forecast to generate £755 million in gross added value during the first ten years of operation, bringing two million visitors to the City which would be key to the economic growth of the local area. In terms of learning, the ambition was for the Museum to reach every London school child thus contributing to social mobility. In heritage terms, these beautiful buildings would be saved, creating a remarkable new offer. Environmentally, the Museum was also extremely proud of the story it could tell here. The proposals here would be a landmark in terms of sustainability which would see over 70% of the existing fabric preserved and would reduce operational carbon through connecting to Citigen and smart technologies. Ms Ament commented that the Museum were keen to lead the way in helping reach the City's Net Zero target and Climate Action Strategy.

Mr Williams opened by stating that this application was the product of seven years of detailed work. This ambitious, remarkable project would redefine what it means to be a 21st Century Museum whilst simultaneously securing the sustainable future of the three Market buildings in Smithfield. He reported that the Victorian General Market and Fish Market buildings as well as the 1960s Poultry Market had unfortunately fallen into significant disrepair. Under these plans, the General and Poultry Markets would provide the Museum with wonderfully dramatic, contrasting spaces both above and below ground and spaces capable of hosting an extensive range of displays, exhibitions, learning activities and events to trigger the imagination of both young and old. The ambition here was for a world-class venue with no parallels. Proposals for the

Fish Market and Annexe site as a whole were a fundamental and exciting component of the submission and would be developed separately.

Mr Williams went on to report that the brief on this had remained constant throughout – to preserve and celebrate the historic fabric of these buildings and to deliver a truly world-class destination that can effectively tell the story of London and Londoners. The aim was also to create the most sustainable set of buildings possible. It was highlighted that the Team's design approach adhered to the principle of the circular economy, looking to reuse, repair and recycle materials where possible to reduce the embodied carbon footprint and targeting 95% diversion of waste from landfill. The buildings would connect to the local Citigen facility across Charterhouse adjacent to the buildings for the supply of low carbon heating and cooling produced as a by-product or electricity generation. The proposals were targeting a rating of BREEAM excellent and, by preserving up to 70% of the site's fabric, the proposals would ensure that the history and character of this part of the City would remain, be celebrated and become an integral part of the Museum's storytelling.

The Committee were informed that early work repairing, stabilising and cleaning the site had begun but no construction work had yet commenced. The project aimed for practical completion of the General Market and West Poultry Avenue by 2025 with a public opening in 2026. Work on the Poultry Market should be completed later in 2027 and opening shortly thereafter. Whilst Mr Williams acknowledged that several changes had been made to the 2019 application, these were largely in response to updated planning and environmental policies and were therefore minimal. Some of these changes were also as a result of site discoveries impacting upon internal layouts. Mr Williams concluded by encouraging the Committee to approve this application which was clearly a once in a lifetime project.

The Chairman thanked both for their contributions and invited any questions that Members might now have of the applicant team.

A Member underlined that the preservation of these historic buildings was a major benefit of this application however Harts Corner and the Turret were not to be reinstated. He asked Mr Williams why this was the case. Mr Williams recognised that Harts Corner was part of the history of the building that had been bombed during the Second World War. The team had therefore had discussions around its preservation. He reported that the intention here was to tell the story of the building.

With no further questions of the speakers, the Chairman invited any questions of Officers.

A Member commented that the Committee had previously expressed concerns as to how the project would work alongside the existing market. He therefore sought an update from Officers on this point. He went on to refer to the holding objection received from the Smithfield Market Tenants' Association and questioned whether there was any further update on this. Officers responded to state that the holding objection still stood and was addressed in detail within the Committee papers. Officers also acknowledged that the existing market which was to be retained and the Museum both had relatively intense uses of the public highway but were also,

in many ways, complimentary in that the Museum would see peak activity over lunchtime periods with high levels of pedestrian activity with the Market seeing more intensive use during the evening and overnight periods. It was reported that Officers had worked closely with the applicant and the Market Superintendent to examine how the two uses could be facilitated to successfully coexist. Members were informed that the public realm would be subject to Section 278 works which would include areas of significant footway widening, particularly in the area adjacent to the Poultry Market where the removal of some market bays was also proposed. The market bays adjacent to the General Market would also be re-timed and integrated into a wider public realm strategy such that during the day they could function and create generous footways yet also accommodate loading activities associated with the General Market during the evening period. Members were therefore informed that a lot of conversation and negotiation had gone into the ways in which both uses could be accommodated. The proposed coach drop off area on East Poultry Avenue would also function as a dual use and accommodate Market activity at appropriate times. All of the Section 278 works would also be subject to further consideration and detailed design.

Another Member spoke on the proposed stopping up of West Poultry Avenue stating that the condition imposed upon the Museum would be around maintaining a thoroughfare through here. He commented that this seemed to be unnecessary given that there were plenty of walkways around the perimeter of the site and that this would reduce their flexibility in terms of this being a curated space. Officers stated that the part of the proposals that would form the main entry point and access to the Museum was intended to form an orientation point and for this to be a curated space. It was therefore considered necessary for this area to be stopped up but, at the same time, Officers were keen to maintain as much permeability as possible through the site for those not visiting the Museum. Officers went on to refer to policies within the Local Plan which sought to enhance permeability around the City and stated that the Museum had indicated that they could potentially open the route from 7am to midnight as a through route for people. That being said, it was acknowledged within the papers that at times there might be higher security here depending on what exhibitions were showing and that they may also wish to use this space for events. All of this would be factored into the Access Management Plan.

The Chairman then invited members of the Committee to debate the application.

A Member stated that she was delighted to see this scheme coming to fruition and that this would be a public building with public use, opening up the City's heritage to all and telling the story and history of London and its people.

Another Member commented that he was fully supportive of the application however he referred once more to the traffic management issues which he was keen to see taken very seriously and have the Streets and Walkways Sub-Committee scrutinise in further detail to achieve a satisfactory outcome as opposed to just leaving this to Officers to resolve.

Another Member questioned whether anything needed to be put forward to strengthen this point around Member oversight of the issue. The Chairman stated that he felt that it was sufficient to instruct Officers to bring the matter back to the

Streets and Walkways Sub-Committee at this juncture. Officers undertook to action this.

A Member stated that he was very pleased to learn that so much thought had been given to how the Museum site would work alongside the existing market and how the transition would be managed. As a result, he now felt able to support this extraordinary project.

The Chairman summed up by underlining that this was not an isolated project, and that the Museum's move played a much bigger, critical role in what the City would look like over the coming decades making it a genuine global destination. He also commended the way in which the project was being designed sympathetically to maintain the fabric of these buildings and tell their stories as active workplaces. He encouraged the Committee to vote in favour of these proposals.

Having fully debated the application, the Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 16 Votes
OPPOSED – None
There were no abstentions.

The recommendations were therefore carried unanimously.

RESOLVED –

(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

- (a) the Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);
- (b) planning obligations and other agreements being entered into (or given unilaterally by the City Corporation as landowner) under Section 106 of the Town & Country Planning Act 1990 (and ancillary powers) in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed and a commitment has been given by the City Corporation as landowner that it will comply with the obligations in connection with the development and that it will ensure that the obligations are binding on any future purchaser or development partner;

(2) That your officers be instructed to negotiate and secure the planning obligations through an agreement or unilateral undertaking as detailed in this report;

(3) That it is noted in principle that land affected by the building which is currently public highway and highway over which the public have a right of access, including West Poultry Avenue may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may proceed under delegated authority with arrangements for advertising and

making of a stopping-up order for the various areas, to the extent that such stopping-up order is unopposed . If there were to be any unresolved objections to the stopping-up order, a report would be taken to the Planning and Transportation Committee for decision;

(4) That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (information to be provided to the developer post determination of the application), and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

5. **POULTRY MARKET CHARTERHOUSE STREET LONDON EC1A 9LH - LISTED BUILDING CONSENT**

The Sub-Committee considered a report of the Planning and Development Director regarding the Poultry Market Charterhouse Street London EC1A 9LH – specifically,

the part demolition, repair, and refurbishment of the building known at the Poultry Market, Charterhouse Street at ground, first and basement levels, associated with a change of use of the building to provide a museum and ancillary uses and areas; including: works associated with an entrance structure on West Poultry Avenue; internal alterations including creation of a part new first floor; fabric removal and refurbishment on all floors; replacement glazing; facade cleaning and other facade repair; levelling of ground floor; works of repair to the roof; installation of new heating and cooling equipment; new M&E services; repurposing of the south service bay and associated infill structure; remodelling of the north service bay; internal decoration; replacement balustrade; and other associated works as shown on the submitted plans and drawings.

The Committee voted on these recommendations alongside those set out under Agenda Item 4.

Having fully debated the application, the Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 16 Votes
OPPOSED – None
There were no abstentions.

The recommendations were therefore carried unanimously.

RESOLVED - That listed building consent be granted for the above proposal in accordance with the details set out in the attached schedule.

6. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT***

The Sub-Committee received a report of the Chief Planning Officer and Development Director detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since the report to the last meeting.

RESOLVED – That the report be noted.

7. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR***

The Committee received a report of the Chief Planning Officer and Development Director detailing development applications received by the Department of the Built Environment since the report to the last meeting.

RESOLVED – That the report be noted.

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

Local Plans Sub-Committee

A Member recognised that this came under the work of the Grand Committee but noted that they were not now scheduled to meet until January 2023. The Member referred to the recent cancellation of Local Plans Sub-Committee meetings for the remainder of 2022 in order to enable Officers to work up the engagement strategy around this. However, there were now some concerns as to the time delay and Members being able to see and comment upon this Strategy ahead of it being finalised and in between meetings.

As a more general point, the Member questioned whether matters relating to the work of the grand Committee could also be raised at this Sub-Committee given that it was now set to meet much more frequently. The Deputy Chairman stated that he would also appreciate some clarity on this point. The Comptroller and City Solicitor stated that questions here should really be related to the work of this Sub-Committee as stipulated on the agenda. It could, however, be at the Chair's discretion to alter this for time critical matters although it was suggested that these could equally be dealt with in writing or via email in between scheduled Grand Committee meetings.

With regard to a further comment as to the frequency of meetings now proposed for the Grand Committee, the Town Clerk reported that this matter was entirely within the hands of the Committee and the Chairman and that if they were of view, in due course, that quarterly meetings were not sufficient, this could be added to or revisited as necessary.

Reporting on Discharged Conditions

The Chairman highlighted that this matter had been raised with him on a few occasions by another Committee member who had questioned how these matters were reported on once they had been discharged. He stated that he felt that it would be helpful for Officers to include this information within the weekly summary distributed to the full Court. Officers stated that they would be happy to action this and would also continue to include within the agenda papers for Planning and Transportation Committee meetings.

A Member questioned whether the website featured a list of conditions attached to individual planning applications alongside information as to when these were discharged for the public to consult. The Planning and Development Director

reported that whenever a condition was discharged this was made clear on the website however, he recognised that this might require the public to plough through the paperwork in relation to a given application as, at present, a summary sheet detailing this did not exist. The Member commented that this did exist for other Local Authorities and questioned whether a suitable solution could be found here. Officers added that when planning history was searched for on the website the planning permission featured alongside a list of conditions that had been discharged on that same page, but it was accepted that this could possibly be more helpfully summarised going forward.

9. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
Forthcoming Committee Visits

The Chairman reported that the Committee had the opportunity to undertake two visits in the coming weeks. Firstly, a visit to the public terraces at 22 Bishopsgate was scheduled for Monday, 18 November at 10.30am for which he encouraged Members to RSVP as soon as possible. Secondly, a tour of the Lloyds Building was also being proposed for Friday, 2 December at 2pm and further details on this would be communicated to all in the coming days.

Consolidation

A Member noted that at the last meeting, there had been some discussion around bringing back a future report on the success (or otherwise) of consolidated services and how these were working in practice for applicants. She suggested that it might be helpful to invite them to address a future meeting of the Committee on this. The Planning and Development Director reiterated that 22 Bishopsgate was probably the best, current, working example of this and he suggested that this might also helpfully be weaved into next week's visit to the site.

The meeting ended at 11.43 am

Chairman

Contact Officer: Gemma Stokley
gemma.stokley@cityoflondon.gov.uk

This page is intentionally left blank

Agenda Item 4

Committee:	Date:
Planning and Transportation	13 December 2022
Subject: Ibex House 42 - 47 Minories London EC3N 1DY Alteration and extension to the existing building at ground and lower ground floor on Haydon Street and Portsoken St with the incorporation of courtyard garden areas, an on-site servicing bay and blue badge parking areas adjacent; Roof level extensions at the 8th and 9th floors; Alterations to the ground floor Minories facade, including level access provision; Alteration and creation of roof terraces and green roofs; replacement / upgrade of balustrades on all elevations; internal reconfiguration of lower levels to incorporate a new mezzanine level, internal cycle storage, and refuse store; creation of a new learning / cultural centre (sui generis) at the ground floor corner of Portsoken Street and Minories;; and retention of existing public house (sui generis) at ground floor / lower ground corner of Haydon Street and Minories including elevational alterations.	Public
Ward: Tower	For Decision
Registered No: 21/00793/FULMAJ	Registered on: 28 October 2021
Conservation Area:	Listed Building: Grade II

Summary

The application proposes alterations to and extension of the existing building at ground and lower ground floor on Haydon Street and Portsoken St with the incorporation of courtyard garden areas, an on-site servicing bay and blue badge parking areas adjacent. ; Alterations to the ground floor Minories facade, including level access provision; Alteration and creation of roof terraces and green roofs; replacement / upgrade of balustrades on all elevations; internal reconfiguration of lower levels to incorporate a new mezzanine level, internal cycle storage, and refuse store; creation of a new learning / cultural centre (sui generis) at the ground floor corner of Portsoken Street and Minories; and retention of existing public house (sui generis) at ground floor / lower ground corner of Haydon Street and Minories including elevational alterations.

Thirteen objections were received across both the planning application and listed building consent applications during the first round of statutory consultation in December 2021. No further comments have been received following the second round of full formal statutory consultation in October and November 2022 at the time of writing. The objections received are summarised in a table in the main body of this report.

The original submission was formally amended in October 2022 following Officer comments and other consultee responses. The amendments included (but were not limited to) a new on-site servicing strategy, increased cycle parking, increased original fabric retention, reduction to the size of the ground level pavilion extensions and refinement of their design, provision of level access from the primary frontage of the site, an improved public and cultural benefit offering and amended commitments to public realm improvements and S278 works.

The proposed extensions at the ground levels and the 8th and 9th floors would equate to 1812sq.m overall (GIA). Internally, and as part of the works, various alterations to the allocation of existing uses within the building are proposed to occur, which would result in a total of 22,689sq.m (GIA) of Class E office space, with new flexible reception, meeting areas and new external outdoor amenity spaces. The proposed scheme, along with previously consented refurbishment works to levels 1 to 7, would lift the building from Grade B to Grade A quality office accommodation.

A further 124sq.m (GIA) would be dedicated to an active café use on Portsoken Street along with 161sq.m (GIA) of dedicated space to a new cultural learning and exhibition use (sui generis) at ground level on the corner of Minorities and Portsoken Street. Moreover, the internal alterations would result in an increase to size of the existing public house from 227sq.m to 563 sqm.

The scheme would enable the continued and optimal use of the building, accommodating new ways of working reflected in flexible floorplates, meeting spaces and outdoor amenity areas. This supports post-Covid recovery as identified in the 'London Recharged: Our Vision for London in 2025' report.

Historic England and the Amenity Societies were consulted. Historic England the 20th Century Society raised concerns with the original iteration of the proposal in late 2021. Following receipt of amendments to the scheme in October 2022, Historic England advise the proposals address their concerns and their objection has been withdrawn. No further comments have been received from the 20th Century Society.

The location and scale of the roof and ground floor extensions would integrate with the local context and would read as seamless and subordinate additions to IbeX House. The proposals are design led in response to the heritage significance, architectural aesthetic, and materials of IbeX House. The building would become more outward facing, legible and provide active ground floor elevations and uses enlivening the street scene with redesigned inclusive entrances and increased passive surveillance.

The widening of the pavement and consolidation of refuse and servicing and the integration of urban greening within the site would deliver an enhanced pedestrian experience.

The modest nature of the roof extension proposals and their virtually indiscernible appearance on the skyline would preserve the ability to recognise and appreciate the Tower of London as a strategically important landmark whilst according with associated visual management guidance. The roof extensions would have a negligible impact on the characteristics and composition of LVMF 10A.1 and LVMF25A.1-3 and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LVMF SPG.

The proposals would preserve the heritage significance and setting of The Writers House as a non-designated heritage asset.

The delivery of the proposals would result in minor adverse impacts to areas of high and moderate heritage significance of IbeX House as a designated heritage asset. The low level of less than substantial harm derives from elements of the pavilion extensions and the changes to the public house. There would be some slight erosion of the physical fabric and features through minor demolition and to the architectural form and original plan through the obscuration of parts of the building. For the most part however, the overall artistic, architectural and historic values are preserved and in parts are enhanced. The proposals would comply with DM 12.1, DM 12.2 and DM 12.3(1), draft City Plan 2036 policies S11 and HE1, and London Plan Policy HC1 (A, B, D and E) however elements of the proposals would draw conflict with DM 12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).

The scheme would deliver public realm enhancements around the site, including the introduction of a raised table on Portsoken Street, upgrades to the northern wall of Portsoken Street Garden and footpath widening works on Haydon Street.

A total of 333 long stay and 53 short stay cycle parking space are proposed. This is a significant improvement on existing conditions where only 89 cycle spaces are provided externally within the southern and northern forecourts of the site. The long stay cycle parking would be provided at ground and basement levels, with associated showers and locker facilities, accessed a dedicated entrance off Haydon Street. The provision of cycle parking spaces and end of trip facilities would exceed the requirements of the London Plan.

A new on-site servicing strategy is proposed as part of this application and would occur within a new on-site servicing bay to be accessed from Haydon Street. This would significantly improve existing conditions, whereby the majority of servicing takes place on-street from Haydon Street. The proposed servicing strategy would bring the site into compliance with Local Plan (2015) Policy DM16.5 which seeks to ensure servicing is provided on-site where possible. Further improvements to existing servicing conditions would be secured through planning conditions limiting servicing and delivery hours (where none currently exist) and by securing a

consolidation strategy for deliveries under the S106 Agreement. These measures would reduce wider congestion and improve local traffic conditions in accordance with the draft City Plan 2036 Policy VT2.

The proposed scheme positively addresses the need to minimise operational and embodied carbon emissions and demonstrates improved climate resilience credentials for the building. The scheme responds appropriately to Circular Economy Principles through the retention of the existing building and would achieve a BREEAM 'very good' rating, improving to a targeted BREEAM 'excellent' rating through improvements in the detailed design.

The development includes new urban greening through green roofs, greening to terraces and lower ground winter gardens. The development would achieve an overall Urban Greening Factor of 0.18 based on the City of London methodology and 0.153 based on London Plan 2021 methodology. Whilst this does not meet the minimum requirements of 0.3, the proposal would significantly improve urban greening on the site where none currently exists, despite constraints associated with the listed nature of the building which is a mitigating factor.

A daylight and sunlight assessment has been undertaken to assess the impact on the daylight and sunlight received by neighbouring residential properties. The assessments have been undertaken in accordance with BRE Guidelines. The results demonstrate reductions in daylight and sunlight in all rooms of the assessed properties, would be within BRE Guidelines and are considered to be negligible.

There are no unacceptable adverse built development or operational impacts anticipated for the proposed development and uses, and the recommendation is subject to conditions to mitigate impacts to surrounding uses, which include the requirement to provide an operational management plan (secured by the S106 Agreement), a lighting strategy and conditions to manage the use of the proposed outdoor terraces.

Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment and alongside residential neighbouring properties. Post construction, compliance with planning conditions would minimise any adverse impacts including with restricted hours of use for the terraces.

It is almost always the case that where major development proposals come forward there is at least some degree of non-compliance with planning policies, and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

In this case, the proposal complies with the majority of the development plan but draws conflict with polices relating to heritage (Local Plan 2015 Policy DM12.3 (2), emerging Local Plan 2036 Policy HE1 (1) and London Plan 2021 Policy HC1 (C). National Planning Guidance advises that conflict between development plan

policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs, as guided by the NPPF.

Compliance with the development plan is to be considered by reference to the plan as a whole rather than asking whether the proposed development is in accordance with each and every policy in the plan. That approach recognises the fact that individual policies may pull in different directions, and that it would be difficult to find any project of significance that was wholly in accord with every relevant policy in the plan. Whilst there is some minor conflict with the heritage policies mentioned above, given the counteracting benefits which promote other policies, the proposals are considered to be acceptable. In this case, the proposals are considered to be in accordance with the development plan as a whole.

NPPF paragraph 202 requires that any less than substantial harm be balanced against the public benefits of the development proposal. The paragraph 202 balancing exercise is to be applied when considering the harm to the host building. Therefore, an evaluation of the public benefits and the weight afforded to them has been undertaken. Officers consider that the harm would be significantly outweighed by the benefits of the proposals including new cultural learning and exhibition space, public realm enhancements and the revitalisation of an iconic historic building and so the requirements of paragraph 202 are met. This conclusion is reached even when giving great weight to heritage significance as required under statutory duties.



When taking all matters into consideration, subject to the recommendations of this report, it is recommended that planning permission and listed building consent be granted.



Recommendation

1. That planning permission be granted for the above proposal in accordance with the details set out in the attached schedules subject to:
 - a) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notices not to be issued until the Section 106 obligations have been executed;
2. that your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

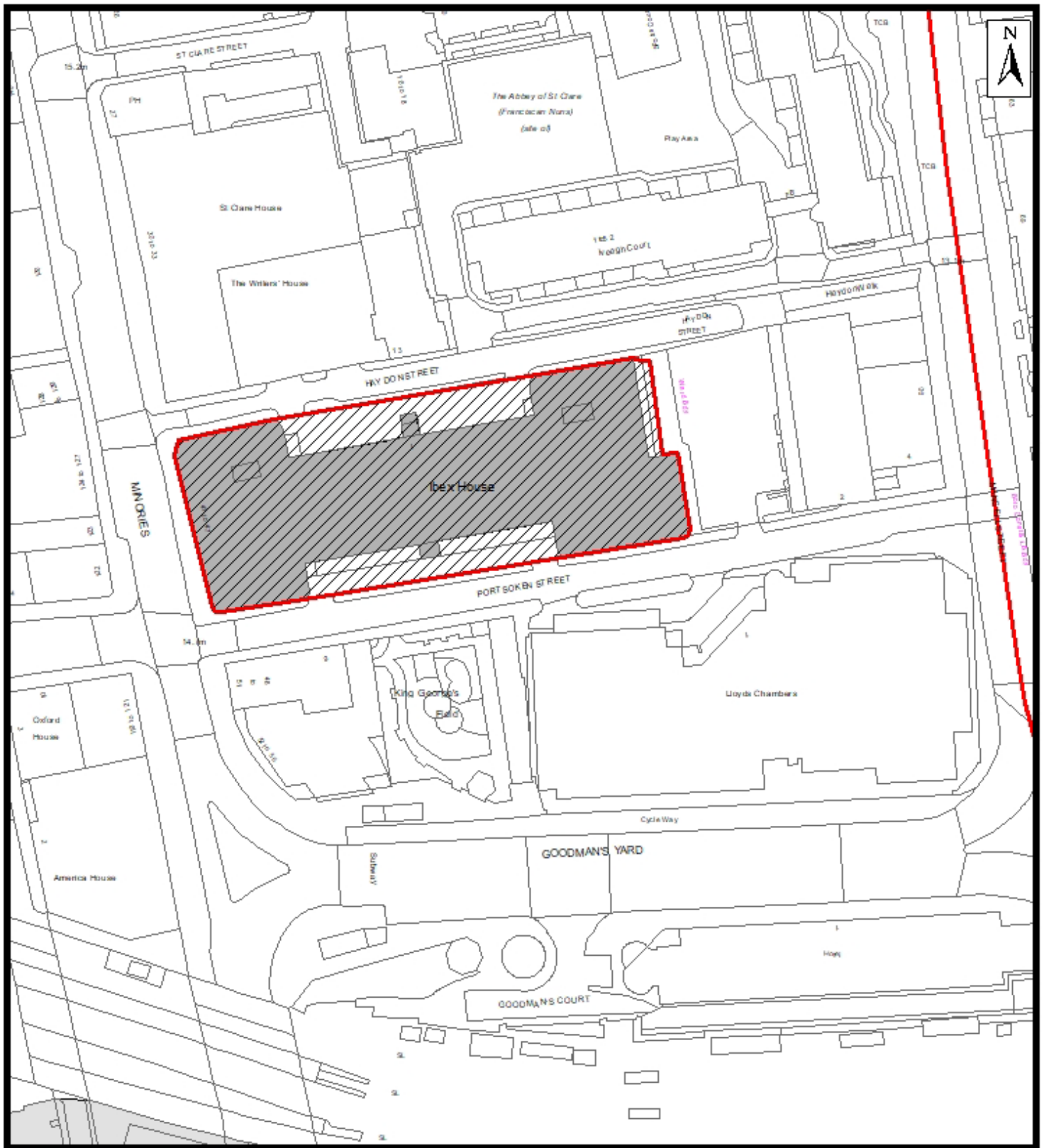
APPLICATION DASHBOARD for **Ibex House, 42-27 Minories**

This dashboard provides a summary of the key metrics for the development and should be read in conjunction with the report as a whole.

TOPIC	INFORMATION			
1. SITE PHOTOS	EXISTING		PROPOSED	
				
2. HEIGHT	EXISTING		PROPOSED	
	Ten storeys (including roof plant level), plus basement and mezzanine. Maximum height: 49.80m (AOD)		Ten storeys, plus basement and mezzanine. Maximum height: As existing	
3. FLOORSPACE GEA (SQM)	Floor space existing and proposed			
	EXISTING		PROPOSED	
	24,639 TOTAL		26,451 TOTAL	
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	<ul style="list-style-type: none"> 200 (approx.) based only on the floors affected by the development. 		<ul style="list-style-type: none"> 468 (approx.) based only on the floors affected by the development. 	
5. VEHICLE / CYCLE PARKING	TYPE	EXISTING	POLICY REQUIREMENT	PROPOSED
	Car parking spaces	0	<u>0</u>	0
	Accessible car parking spaces	1	<u>1</u>	2
	Cycle long stay	89 (short and long)	318	333
	Cycle short stay		53	53
	Lockers	0	318	300
	Showers	0	32	30
6. HIGHWAY LOSS / GAIN	No change			
7. PUBLIC REALM GAIN	Improvements include: <ol style="list-style-type: none"> Footway widening on Haydon Street; Footway surface upgrades on Portsoken Street; 			

	<ul style="list-style-type: none"> 3. Removal of redundant vehicular crossovers on Portsoken Street 4. Construction of a raised table on Portsoken Street; 5. Upgrade to the northern wall/fence to Portsoken Street Garden. 	
8. STREET TREES	EXISTING	PROPOSED
	<ul style="list-style-type: none"> • None existing 	<ul style="list-style-type: none"> • None proposed
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	<u>33</u>	<u>33</u>
10. RETAINED BUILDING ELEMENTS IN SITU	<ul style="list-style-type: none"> • 100% of main building elements <p>Minimal local demolition, mostly internal fabric and services Externally: windows and balustrades at top and low levels, some existing roof level elements, roof lights and fabric around the existing side entrances</p>	
11. OPERATIONAL CARBON EMISSION SAVINGS	<ul style="list-style-type: none"> • 36% improvement (whole building) against Building Regulations Part L 2013 (policy target 35% improvement) 	
12. OPERATIONAL CARBON EMISSIONS	<p>Regulated and unregulated carbon emissions:</p> <ul style="list-style-type: none"> • Existing building: 849.7 tCO₂e/annum • Proposed building: 619.9 tCO₂e/annum 	
13. BREEAM RATING	<ul style="list-style-type: none"> • BREEAM UK Non-domestic Refurbishment and Fit-Out 2014 pre-assessment 	
14. URBAN GREENING FACTOR	<ul style="list-style-type: none"> • 0.153 (London Plan Policy target 0.3) • 0.18 (CoL Local Plan Policy target 0.4) • The opportunity for greening the site is constrained by the limited amount of external space and the constraints associated with the listed building, where loading capabilities are restrained. • Proposals have been developed to integrate greenery wherever possible, including on the roof of servicing structures and new terrace areas. These proposals improve the current condition where there is a lack of greenery of the existing buildings and surrounding streets. 	
15. AIR QUALITY	Air Quality Neutral for building emissions.	





Site Location Plan



© Crown copyright and database rights 2022 OS 100023243

ADDRESS:
Ibez House

CASE No.
21/00793/FULMAJ

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY



ENVIRONMENT DEPARTMENT

Photographs



Above: View looking east from the corner of Minories and Crosswall.



Above: View looking north from Portsoken Street Garden.



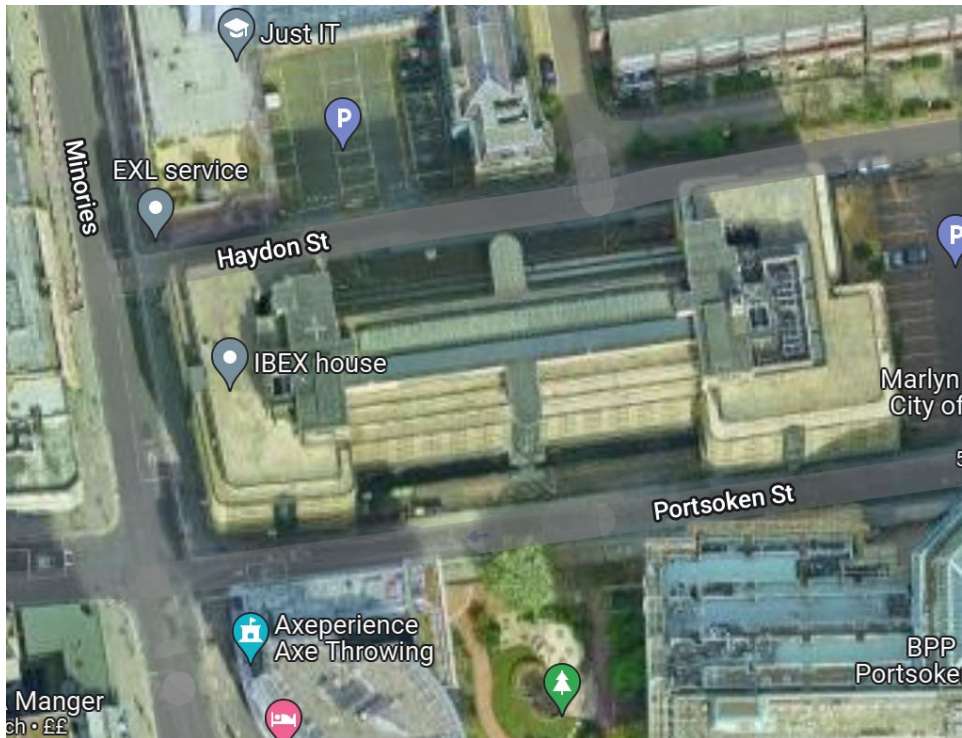
Above: View looking north from Minories.



Above: View looking north-east on Portsoken Street.



Above: View looking south-west from Haydon Street.



Above: Aerial view of the application site.

Main Report

The Site

1. The site is located to the east of the City of London, in the Tower Ward, at 41-47 Minories. The site comprises an eleven storey (including basement) office building, with a commercial gym and integrated pub known as the “Peacock”.
2. The site is bound by Haydon Street to the north, Portsoken Street to the south and Minories to the west.
3. The building occupies a large rectangular plot with a total site area is 3221sqm.
4. The subject building, “Ibex House” is Grade II Listed. It is one of only a limited number of surviving 1930s building in the City of London. The building has a distinctive extended ‘H-shaped’ building footprint and was building in a moderne streamline art deco style, notable for its continuous horizontal window bands and curved corners.
5. Forecourts exist on the southern and northern sides of the building. These forecourts are currently used for outdoor cycle parking and bin storage.
6. The existing primary pedestrian access is from Minories on the principal elevation. Level access to the site from this entrance does not exist.
7. Currently, the building is not fully occupied with several of the office floors vacant and the commercial gym tenancy ceased. Further, the “Peacock” pub, which faces the corner of Minories and Haydon Street, is also vacant.

The Surroundings Area

8. The site does not fall within a Conservation Area and the site is not located within the setting of nearby statutorily listed buildings.
9. The site is located within LVMF protected vista corridor (Point 25A.1)To the Tower of London) as set out by the Mayor of London.
10. The site is located just east of Aldgate within a mixed-use area, characterised predominantly by commercial uses but with a consistent presence of hotels, serviced apartments and residential uses. More specifically, the uses of immediately surrounding buildings include the following:
 - Marlyn Lodge – residential;
 - Prospero House – residential;
 - 52-56 Minories – ground floor retail and student accommodation;
 - Iveagh House – residential;

- 30-33 Minories – ground floor retail and office use;
 - Writers House – office use;
 - River House – ground floor retail and residential;
 - 122 Minories – ground floor retail and office use;
 - 124-127 Minories – office use;
 - St Johns House – ground floor retail and flexible residential;
11. Opposite the site on Portsoken Street is King George Field which is one of the smallest existing 'King George V Fields' and is a Site of Importance for Nature Conservation (SINC). The garden features a central pond surrounded by a small area of grass with a mix of shrub and herbaceous planting. There are several benches and tables as well as children's play equipment.
12. The surrounding area is well serviced by public transport connections, as it is within short walking distance of Aldgate underground station and Tower Hill underground station and is within a 15-minute walk of Liverpool Street Station. Several bus routes run close by on Minories and Aldgate High Street

Relevant Planning History

13. Recent and relevant planning history is set out in the following Table 1 below:

Table 1:

Application reference	Proposal Description	Decision	Date of Issue
20/00989/FULL	Replacement of existing windows and fenestration (excluding west elevation).	Approved	12/05/2021
20/00990/LBC	Replacement of existing windows and fenestration (excluding west elevation) and refurbishment of internal office floorspace at first to seventh floor levels, including cores and circulation spaces, to upgrade working areas to modern standards.	Approved	12/05/2021
16/00326/FULL	Installation of steel handrail to south entrance and replacement of existing terrazzo steps.	Approved	02/06/2016
16/00346/LBC	Installation of steel handrail to south	Approved	02/06/2016

	entrance and replacement of existing terrazzo steps.		
14/01240/FULL	Installation of 41 black painted metal bicycle racks to the existing railings within the existing service area to the North and South of the building.	Approved	05/02/2015
14/01241/LBC	Installation of 41 black painted metal bicycle racks to the existing railings within the existing service area to the North and South of the building	Approved	05/02/2015

14. The works approved under application ref: 20/00990/LBC on 12 May 2021 have commenced on site and form what can be seen as “phase 1” of the total refurbishment scheme. This approval allowed for refurbishment works on floors 1 to 7 of the building which do not form part of the applications assessed in this report, with the exception of upgrades external terrace balustrades and surfaces on level 6 and 7.

The Proposed Development:

15. Planning permission is sought for:
- i. Alteration and extension to the existing building at ground and lower ground floor on Hayden Street and Portsoken Street with the incorporation of courtyard garden areas, an on-site servicing bay and blue badge parking areas adjacent.
 - ii. Roof level extensions at the 8th and 9th floors;
 - iii. Alterations to the ground floor Minorities facade, including level access provision;
 - iv. Alteration and creation of roof terraces and green roofs; replacement / upgrade of balustrades on all elevations.
 - v. Internal reconfiguration of lower levels to incorporate a new mezzanine level, internal cycle storage, and refuse store; creation of a new learning / cultural centre (sui generis) at the ground floor corner of Portsoken Street and Minorities; and
 - vi. Retention of existing public house (sui generis) at ground floor / lower ground corner of Haydon Street and Minorities including elevational alterations.
16. Listed Building Consent is sought for:
- i. Alteration and extension to the existing building at ground and lower ground floor on Hayden Street and Portsoken Street with the

incorporation of courtyard garden areas, an on-site servicing bay and blue badge parking areas adjacent.

- ii. Roof level extensions at the 8th and 9th floors;
- iii. Alterations to the ground floor Minorities facade, including level access provision;
- iv. Alteration and creation of roof terraces and green roofs; replacement/upgrade of balustrades on all elevations;
- v. Internal reconfiguration of lower levels to incorporate a new mezzanine level, internal cycle storage, and refuse store; creation of a new learning /cultural centre at the ground floor corner of Portsoken Street and Minorities; and
- vi. Retention of existing public house at ground floor/lower ground corner of Haydon Street and Minorities including elevational alterations.

17. This report deals with the considerations for both applications.

18. The scheme proposes an uplift of 1812sq.m of new build Class E floor space (GEA), comprising primarily of office (Class E(a)) and a café (Class E(b)). The existing gym is proposed to be converted to office use (Class E) and an existing cafe (class E(b)) is proposed to be converted into a public exhibition/learning space (sui generis) as part of the scheme's cultural offering.

19. The existing and proposed floor space areas (GIA) relative to the whole building by use are set out in Table 2 and 3 below:

Table 2: Existing floorspace areas.

Use Class	GEA sqm	GIA sqm
Office (E)	21,469	20,632
Gym (E)	2,550	2,381
Café (E)	376	351
Pub (sui generis)	244	277
Total	24,639	23,591

Table 3: Proposed floorspace areas.

Use Class	GEA sqm	GIA sqm
Office (E)	23,693	22,689
Gym (E)	0	0
Café (E)	140	124
Pub (sui generis)	611	563
Exhibition/learning centre (sui generis)	177	161

Ancillary spaces/plan/cycle storage/shower facilities etc	1,829	1,288
Total	26,451	24,826

20. At the lower ground, mezzanine and upper ground floor levels, extension into the southern and northern forecourts of the site are proposed. These extensions are referred to as 'pavilions' in the Design and Access Statement and would provide new entrances, with level access provision, into the subject building.
21. The pavilion to the south off Portsoken Street would provide a new level access to the upper ground floor reception hub of the office building and would also be dedicated to a new café use. This entry/exit point would also provide a connection between the site and King George's Field. To the sides of this extension, still within the existing forecourt, winter gardens are proposed at lower ground floor level.
22. The pavilion to the north off Haydon Street would provide a further access point to the upper ground floor level reception hub. This pavilion would contain ancillary Class E office space. To the west of this pavilion, still within the existing forecourt, two on-site blue badge car parking spaces are proposed to be provided. To the east of the pavilion, a two-space on-site servicing bay is proposed, along with a staff entrance to the internal cycle storage area.
23. Both lower-level pavilions are proposed to be constructed with a green roof.
24. At the 8th floor level, an extension to the eastern and western wings of this level are proposed, comprising new office floor space. New external terrace areas are proposed to these wings as well as the south and north side of the central office area. New windows and existing windows to be replaced would be replaced with steel (crittall) framed double glazed windows.
25. At the 9th floor level, an extension is proposed to be constructed centrally between the two existing cores and servicing areas which would contain ancillary office space. New external terrace areas and green roofs would be provided on the wings of the 9th floor, to the east and west of the existing cores and service areas.
26. Existing balustrades are proposed to be replaced on levels 6,7,8 and 9. All new and replaced balustrading would be constructed of painted metal to a height of 1.2m.
27. The following amendments to the scheme were submitted in October 2022 following comments from Officers and other consultation responses:

- The incorporation of an on-site servicing solution off Haydon Street;
- The provision of two on-site blue badge parking;
- The provision of level access to the building from the primary Minorities entrance;
- Increase to the number of cycle parking spaces in accordance with London Plan Standards;
- A reduction to the size of the proposed ground floor pavilions on Haydon Street and Portsoken Street, refinement of their design and an increase to the extent of fabric retention;
- Confirmation the pub is to be retained with a combination of façade repair and alteration works;
- The provision of a public learning/cultural centre (sui generis) on the ground floor of the building on the corner of Portsoken and Haydon Street to enhance the public benefits offered by the scheme;
- The incorporation of a publicly accessible café within the pavilion extension off Portsoken Street which is to be publicly accessible.
- The deletion of the proposal to remove on-street carparking spaces on Portsoken Street and associated footpath widening and street tree planting works;
- Incorporation of a proposal to upgrade the fence between Portsoken Street and St George's Field to increase visual transparency; and
- Incorporation of a proposal to increase the width of the footpath on Haydon Street to ensure it is more accessible.

28. The proposed plans were further amended on 21 November 2022 to include the deletion of the northern glazed tower projection at roof level (as had been deleted on the southern side of the proposed extension).

Consultation:

29. The Applicants have submitted a Statement of Community Involvement which outlines their engagement with stakeholders. Prior to submission of the application in September 2021, the applicant sought to engage with the local community via a consultation website. The website was promoted via letters which were sent on 2 July 2021 to 795 nearby residential and business address within proximity to the site, ward members, relevant cabinet members and Officers at the City of London Corporation. No responses were received at this time. A follow up consultation letter was distributed in August 2021. Four responses were received from the community to this second round of pre-application consultation.
30. Following formal submission, the planning application was advertised by notices on site and in the press and letters were sent to neighbouring residential occupiers in December 2021. In total, thirteen (13) objections were

received across the planning and listed building consent applications at this time.

31. The application was re-advertised on 17 October and 16 November 2022 by way of site and press notices and letters to surrounding residential properties, including nearby student accommodation following receipt of amendments to the scheme. No further public comments have been received at the time of writing, however officers will update the Committee as required.
32. It is important to highlight that Historic England raised concerns with the original iteration of the proposal in January 2022. Since the second round of formal consultation in October 2022 (following receipt of amendments to the scheme), Historic England have advised they are pleased to see their concerns have been addressed and wish to withdraw their previous concerns.
33. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the tables below.
34. The views of other City of London departments have been taken into account in the preparation of this report and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.

Consultation Responses	
Thames Water	No objection to the proposal with regard to wastewater network, sewage treatment works and infrastructure capacity. A condition requiring a piling method statement to be submitted is requested.
Officer Responses to Comments	The requested condition relating to the piling method statement is recommended to be included on the planning permission and is incorporated in the conditions schedule.
Historic England	<p>Raised concern with the original iteration of the scheme on the following grounds in January 2022:</p> <ul style="list-style-type: none"> • The extent of original fabric that would be removed on the lower levels on the south and north elevations to facilitate the 'pavilion' extensions would cause; • The 9th floor level extension could be visible from within the tree line to the left of the White Tower of the Tower of London in views from the Southbank. • The projections over the north and south glazed towers would challenge the existing glazed towers. <p>Advised on 22 November 2022 they are pleased to see the concerns raised in January 2022 have been</p>

	addressed by the proposed amendments and advised that they wish to withdraw their previous concerns (detailed above).
Officer Responses to Comments	<p>The amended proposal received in October 2022 included more fabric retention of the lower levels, a view confirming no impact to the White Tower of the Tower of London and deletion of the glazed projection on the southern side of the roof extensions. Subsequently, a further amended roof plan was received in November 2022 deleting the glazed projection from the northern side of the roof extensions.</p> <p>The matters raised by Historic England have been addressed.</p> <p>Further detailed assessment of the proposal on such matters is contained in the Design and Heritage section of this report</p>
20th Century Society	<p>Raised concern with the original iteration of the scheme on the following grounds:</p> <ul style="list-style-type: none"> • The extent of fabric removal on the lower levels on the south and north elevations to facilitate the ‘pavilion’ extensions would cause harm; • The loss of the ‘H-Plan’ for of the building as a result of the lower-level extensions; • The projections over the north and south glazed towers would challenge the existing glazed towers.
Officer Responses to Comments	<p>The amendments to the proposal received in October 2022 greatly reduce the extent of original fabric removal proposed at ground level of the building. Further, the size of the ground level extensions were reduced and refined in design terms. Subsequently, a further amended roof plan was received in November 2022 deleting the glazed projection from the northern side of the roof extensions.</p> <p>Whilst a further response from the 20th Century Society has not been received, it is considered that their original concerns have been addressed by the proposed amendments. Further detailed assessment of the proposal on such matters is contained in the Design and Heritage section of this report</p>
London Underground	No comment.
Officer Responses to Comments	N/A

Historic Royal Palaces	Response not received.
Officer Responses to Comments	N/A
Victorian Heritage Society	Response not received.
Officer Responses to Comments	N/A
The Gardens Trust	Response not received.
Officer Responses to Comments	N/A
London Parks and Gardens Trust	Response not received
Officer Responses to Comments	N/A
Society for the Protection of Ancieny Buildings	Response not received
Officer Responses to Comments	N/A
National Amenity Societies and the Theatres	Response not received
Officer Responses to Comments	N/A
Council for British Archaeology	Response not received
Officer Responses to Comments	N/A
City Heritage Society	Response not received
Officer Responses to Comments	N/A
Georgian Group	Response not received
Officer Responses to Comments	N/A
Lead Local Flood Authority	No objection subject to a condition requesting further details of green roofs in SuDs terms.
Officer Responses to Comments	The requested condition relating to green roof details is recommended to be included on the planning permission and is incorporated in the conditions schedule.
City of London Department of Markets and Consumer Protection.	No objection subject to recommended conditions relating to scheme of protective works, noise and amenity impact mitigation related conditions.
Officer Responses to Comments	The requested conditions are recommended to be included on the planning permission and have been incorporated into the conditions schedule.
City of London Cleansing	No objection to the proposed waste storage and collection facilities described within the submitted

	Transport Statement and the supporting email received from the Planning Agent (Savills) on 21 November 2022.
Officer Responses to Comments	Further details of the waste management strategy is recommended to be required as part of the Deliveries and Services Management Plan to be secured as part of the S106 Agreement.
City of London Open Spaces	Supportive of the proposed upgrades to the northern wall of Portsoken Street Garden proposed.
Officer Responses to Comments	These works are recommended to be secured under the S106 Agreement.
City of London Transport Planning	Supportive of the proposal, noting the proposed significant uplift in on-site cycle parking and facilities and the provision of an on-site servicing solution and blue badge parking. Requested the submission of a detailed Deliveries and Servicing Management Plan and Travel Plan to be secured as part of the S106 Agreement.
Officer Responses to Comments	The requested plans are recommended to be secured as part of the S106 Agreement.
City of London Highways Department	Advised they appreciate there is no longer a loss of parking bays proposed and the rearrangement of bays is for the purpose of providing better pedestrian access across Portsoken Street. Advised that parking bays on the raised table should be avoided and should be relocated as near as possible to their existing position and the raised table should extend to the garden entrance to provide pedestrians with a level cross surface at this point.
Officer Responses to Comments	The proposed S278 works include a raised table. The raised table shown on the proposed S278 works plan is labelled as to C.O.L specification. The size and layout of the raised table and any need for relocation of car parking spaces will be agreed as part of negotiations for the S106 Agreement.
City of London Access Officer	Supportive of the proposed improvements including the introduction of step-free access into the building and the provision of off-street blue badge parking and storage for larger cycles. Recommended some further alterations to the size of shower facilities to ensure they are wheelchair accessible and further details on the step free access from Minorities.
Officer Responses to Comments	Further details on the step free access layouts and the internal layout of the shower facilities is recommended to be secured by condition.
City of London District Surveyors – Fire	No objection to the amended Fire Statement (received November 2022).
Officer Responses to Comments	N/A

Public Objections	
Flat 508 Marlyn Lodge	Objects to the proposal due to the potential impact of construction noise to residents of Marlyn Lodge and considers the development to not be necessary.
Officer Responses to Comments	<p>A Scheme of Protective Works and a Construction Logistics Plan are recommended to be required by conditions of the planning permission to ensure construction related amenity impacts are suitably mitigated and managed.</p> <p>The Applicant has also advised the additions are proposed to be constructed using a cross laminated timber (as opposed to new concrete framing and pouring). The use of this material would help to reduce the overall construction time.</p> <p>A detailed assessment of the principle of the development and amenity impacts is set out in detail in this report.</p>
2 Portsoken Street	Considers the proposal to be a flawed investment given many people now work from home (due to impacts from Covid) thus resulting in there being no need for additional commercial office space in the city.
Officer Responses to Comments	A detailed assessment of the proposal with respect to economic considerations is set out in this Economic Considerations section of this report.
32 Admirals Court	Objects because there is no parking in within the vicinity of the site which makes it difficult for maintenance services in the area.
Officer Responses to Comments	<p>The proposals were amended in September 2022 to no longer include the removal of on-street 'pay and display' car parking spaces as part of the scope of potential Section 278 works on Portsoken Street.</p> <p>Further, the proposals have been amended to include the incorporation of an on-site servicing solution off Haydon Street which will reduce on-street demand in the immediate vicinity of the site.</p>
Flat 6, 6 Portsoken Street.	Objects noting the proposal will significantly reduce natural light for all flats in Prospero House (6 Portsoken Street).
Officer Responses to Comments	The proposal is fully compliant with BRE Guidelines and no unacceptable reductions to the daylight and sunlight amenity of neighbouring residential dwellings would occur. Further assessment of this matter is set out in the Daylight and Sunlight Impact section of this report.

Flat 10, 6 Portsoken Street	Objects to the proposal due to potential construction noise impacts and reduction of daylight and sunlight access.
Officer Responses to Comments	<p>A Scheme of Protective Works and a Construction Logistics Plan are recommended to be required by conditions of the planning permission to ensure construction related amenity impacts are suitably mitigated and managed. The Applicant has also advised the additions are proposed to be constructed using a cross laminated timber (as opposed to new concrete framing and pouring). The use of this material would help to reduce the overall construction time.</p> <p>Having regard to daylight/sunlight impacts, the proposal is fully compliant with BRE Guidelines and no unacceptable reductions to the daylight and sunlight amenity of neighbouring residential dwellings would occur due to the proposed development. Further assessment of this matter is set out in the Daylight and Sunlight Impact section of this report.</p>
Flat 1, 6 Portsoken Street	Objects to the proposed roof extensions noting they will block light and result in noise impacts which would be a detriment to the neighbourhood.
Officer Responses to Comments	<p>The proposal is fully compliant with BRE Guidelines and no unacceptable reductions to the daylight and sunlight amenity of neighbouring residential dwellings would occur due to the proposed development. Further assessment of this matter is set out in the Daylight and Sunlight Impact section of this report.</p> <p>With respect to noise related impacts, conditions are recommended to be included on the planning permission to ensure the use of proposed roof terrace areas is controlled to mitigate against potential noise and disturbance impacts to nearby residential occupiers. This matter is further discussed in the Amenity section of this report.</p>
Flat 15, 6 Portsoken Street	Objects to the proposal due to daylight and sunlight impacts and loss of outlook. Further, raises concern with respect to the impacts of light pollution currently caused by the building which this proposal may worsen. Raises concern with the City's lack of concern for residential occupiers.
Officer Responses to Comments	Having regard to daylight and sunlight impacts, the proposal is fully compliant with BRE Guidelines and no unacceptable reductions to the daylight and sunlight amenity of neighbouring residential

	<p>dwelling would occur due to the proposed development. Further assessment of this matter is set out in the Daylight and Sunlight Impact section of this report.</p> <p>The submission of a detailed Lighting Scheme is recommended to be secured as a condition of the planning permission to ensure new lighting is in accordance with the City's Lighting Strategy. Further, the Applicant has advised the internal refurbishment of floors 1-7 (subject to a separate Listed Building Consent) will provide for the installation of motion sensor controls for lights within the existing building and also within the new floor space. This would improve existing light pollution issues described by the objector.</p>
Flat 11, 6 Portsoken Street	Objects to the proposal because the proposed roof extensions will block the view currently enjoyed by residents of Prospero House.
Officer Responses to Comments	The proposed roof extensions would infill space around and in-between existing built form and would not extend beyond the maximum height of the existing building. The outlook from residential dwellings would not be unreasonably altered. Further assessment of the proposed height and massing of the extensions is assessed in the Design and Heritage section of this report.
Flat 12, 6 Portsoken Street	Objects to the proposal due to potential noise and disturbance during construction, impacts from existing light pollution issues and daylight and sunlight loss impacts.
Officer Responses to Comments	<p>A Scheme of Protective Works and a Construction Logistics Plan are recommended to be required by conditions of the planning permission to ensure construction related amenity impacts are suitably mitigated and managed. The Applicant has also advised the additions are proposed to be constructed using a cross laminated timber (as opposed to new concrete framing and pouring). The use of this material would help to reduce the overall construction time.</p> <p>Having regard to daylight/sunlight impacts, the proposal is fully compliant with BRE Guidelines and no unacceptable reductions to the daylight and sunlight amenity of neighbouring residential dwellings would occur due to the proposed development. Further assessment of this matter is</p>

	<p>set out in the Daylight and Sunlight Impact section of this report</p> <p>A detailed Lighting Scheme is recommended to be secured as a condition of the planning permission to ensure new lighting is in accordance with the City's Lighting Strategy. Further, the Applicant has advised the internal refurbishment of floors 1-7 (subject to separate Listed Building Consent) will provide for the installation of motion sensor controls for lights within the existing building and also within the new floor space. This would improve existing light pollution issues described by the objector.</p>
Ground Floor, Ibex House	<p>Objects to the proposal noting little to no consultation has occurred between the Applicant and existing commercial tenants of Ibex House. Notes the lack of communication and 'respect' by the landlord indicates they are not likely to care about the concerns of residents and the integrity of the historical Art Deco building.</p>
Officer Responses to Comments	<p>Officers are satisfied that consultation has been undertaken as required. Concerns raised relating to the landlord are not a planning matter.</p>
604 Marlyn Lodge, Portsoken Street	<p>Objects to the proposed relocation of deliveries and servicing to Portsoken Street, noting this would adversely affect residents of Portsoken St in terms of noise and air pollution.</p> <p>Objects to the proposal to ensure deliveries occur 'outside of peak hours' as this would cause noise and disturbance in late evenings and early mornings.</p> <p>Objects to the removal of on-street carparking spaces on Portsoken Street noting this would cause further traffic issues.</p> <p>Objects to proposal because the extension to the east elevation would cause a loss of daylight and sunlight for nearby residents and the use of the proposed terraces would cause noise and overlooking impacts.</p>
Officer Responses to Comments	<p>The proposals were amended in October 2022 to include a new on-site servicing and deliveries solution which would be accessed from Hayden Street, thus deleting the proposal to service on-street on Portsoken Street.</p> <p>Further, the proposals were amended in October 2022 to no longer include the removal of on-street</p>

	<p>'pay and display' car parking spaces as part of the scope of potential Section 278 works on Portsoken Street. Therefore, the existing on-street carparking spaces would be maintained.</p> <p>The proposal is fully compliant with BRE Guidelines and no unacceptable reductions to the daylight and sunlight amenity of neighbouring residential dwellings would occur due to the proposed development. Further assessment of this matter is set out in the Daylight and Sunlight Impact section of this report.</p> <p>With respect to noise related impacts, conditions are recommended to be included on the planning permission to ensure the use of proposed roof terrace areas is controlled to mitigate against potential noise and disturbance impacts to nearby residential occupiers. This matter is further discussed in the Amenity section of this report.</p>
<p>Flat 12, 6 Portsoken Street</p>	<p>Objects to the proposed roof extensions noting these would cause a loss of daylight and sunlight access and would cause overlooking impacts. Raises further concerns with the potential for noise impacts from the proposed winter garden areas and the construction period.</p>
<p>Officer Responses to Comments</p>	<p>The proposal is fully compliant with BRE Guidelines and no unacceptable reductions to the daylight and sunlight amenity of neighbouring residential dwellings would occur due to the proposed development. Further assessment of this matter is set out in the Daylight and Sunlight Impact section of this report.</p> <p>With respect to noise related impacts, conditions are recommended to be included on the planning permission to ensure the use of proposed roof terrace areas is controlled to mitigate against potential noise and disturbance impacts to nearby residential occupiers. This matter is further discussed in the Amenity section of this report. It is also noted the winter gardens are small green spaces at lower ground level and would be ancillary feature of the office use (not any form of late-night venue).</p> <p>A Scheme of Protective Works and a Construction Logistics Plan are recommended to be required by conditions of the planning permission to ensure construction a amenity impacts are suitably</p>

	<p>mitigated and managed. The Applicant has also advised the additions are proposed to be constructed using a cross laminated timber (as opposed to new concrete framing and pouring). The use of this material would help to reduce the overall construction time.</p>
<p>Flat 603, Marlyn Lodge, Portsoken Street</p>	<p>Objects to the proposal due to loss of daylight and sunlight impacts, noting accumulative impacts caused by other high rises in the area, including Motel One, must be considered.</p> <p>Objects to the proposals due to the potential noise, overlooking and light pollution impacts caused by the proposed roof extensions and terraces. Further, raises concern with the potential mental health impact such extensions could have on Marlyn Lodge residents.</p> <p>Objects to the removal the removal of on-street car parking spaces noting these are used by businesses, residents and office workers. Further, raises concern with the level of traffic congestion in Portsoken Street.</p>
<p>Officer Responses to Comments</p>	<p>The proposal is fully compliant with BRE Guidelines and no unacceptable reductions to the daylight and sunlight amenity of neighbouring residential dwellings would occur due to the proposed development. Further assessment of this matter is set out in the Daylight and Sunlight Impact section of this report.</p> <p>With respect to noise related impacts, conditions are recommended to be included on the planning permission to ensure the use of proposed roof terrace areas is controlled to mitigate against potential noise and disturbance impacts to nearby residential occupiers. This matter is further discussed in the Amenity section of this report. It is also noted the winter gardens are small green spaces at lower ground level and would be ancillary feature of the office use (not any form of late-night venue).</p> <p>A Scheme of Protective Works and a Construction Logistics Plan are recommended to be required by conditions of the planning permission to ensure construction a amenity impacts are suitably mitigated and managed. The Applicant has also advised the additions are proposed to be constructed using a cross laminated timber (as</p>

	<p>opposed to new concrete framing and pouring). The use of this material would help to reduce the overall construction time.</p> <p>The proposals were amended in September 2022 to include a new on-site servicing and deliveries solution which would be accessed from Hayden Street, thus deleting the proposal to service on-street on Portsoken Street.</p> <p>Overlooking and light pollution impacts are assessed in detail in the amenity section of this report.</p> <p>Further, the proposals were amended in September 2022 to no longer include the removal of on-street 'pay and display' car parking spaces as part of the scope of potential Section 278 works on Portsoken Street. Therefore, existing car parking spaces would be maintained.</p>
--	---

Policy Context

- 35. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
- 36. The City of London has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. Onward progress of the Plan has been temporarily paused to enable further refinement, but it remains a material consideration in the determination of applications (although not part of the development plan) alongside the adopted 2015 City of London Local Plan and the London Plan 2021. The Draft City Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
- 37. The Corporation recently adopted the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) which requires safety measures to be considered and incorporated where necessary.
- 38. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), World Heritage Site SPG (GLA, March 2011), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging

Schedule (April 2019), Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.

39. Relevant City Corporation Guidance and SPDs comprises Protected Views SPD (CoL, January 2012), Air Quality SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), City of London's Wind Microclimate Guidelines (CoL, 2019), City of London's Thermal Comfort Guidelines (CoL, 2020), Planning Obligations SPD (CoL, May 2021), Open Space Strategy (CoL, 2016), Office Use (CoL, 2015), City Public Realm (CoL, 2016), Cultural Strategy 2018 – 2022 (CoL, 2018), Whole Life Carbon Optioneering Advice Note (CoL, 2022) and relevant Conservation Area Summaries.

Relevant Statutory Duties

40. The Corporation, in determining the planning application has the following main statutory duties to perform:-
 - to have regard to the provisions of the development plan, so far as material to the application, local finance considerations so far as material to the application, and to any other material considerations. (Section 70 Town & Country Planning Act 1990); and
 - to determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
41. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
42. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

National Planning Policy Framework (NPPF 2021)

43. The National Planning Policy Framework (NPPF) states at paragraph 2 that "Planning Law requires that applications for planning permission must be

determined in accordance with the development plan unless material considerations indicate otherwise”.

44. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social, and environmental.
45. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
 - a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - c) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - d) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
46. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
47. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
48. Chapter 8 of the NPPF seeks to promote healthy, inclusive, and safe places.
49. Paragraph 92 states that planning decisions should aim to achieve healthy, inclusive, and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

50. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 105 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health”.
51. Paragraph 112 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.
52. Paragraph 113 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”. Chapter 12 of the NPPF seeks to achieve well designed places.
53. Paragraph 126 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”
54. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
55. Chapter 14 of the NPPF relates to meeting the challenge of climate change.

56. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
57. Paragraph 154 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
58. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.
59. Paragraph 195 of the NPPF advises that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
60. Paragraph 197 of the NPPF advises, "In determining applications, local planning authorities should take account of:
 - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness."
61. Paragraph 199 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
62. Paragraph 200 states 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. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

63. Paragraph 202 of the NPPF states “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”. When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting.
64. Paragraph 203 of the NPPF states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”

The Square Mile: Future City Report

65. The Square Mile: Future City report aims to “create and sustain a vibrant and engaging City Offer” and target outcomes includes for: “Leisure visitors return and remain in the City, encouraged by the vibrant offer” and for “retail, hospitality, tourism and culture operators to return to and remain in the City, encouraged by City Corporation support”. It is not a development plan document and does not have the weight or statutory status of development plan policy, but may be considered a material consideration.

Destination City

66. ‘Destination City’ launched in May 2022, following an independent review which set out a renewed vision for the City to be a world leading destination for workers, visitors and residents. It is an event driven programme by the City of London, is not a development plan policy and does not have the weight of statutory status of development plan policy, but may be considered a material consideration.

Considerations in this case

67. In considering this planning application, account has been taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
68. The principal over-arching issues in considering this application are:
- the extent to which the proposals comply with the relevant policies of the Development Plan; and
 - the extent to which the proposals comply with Government guidance (NPPF).
 - The application of duty, when considering whether to grant planning permission, to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses when determining the planning application and the duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant listed building consent.
 - The appropriateness of the proposed uses.
 - Whether the proposal supports the business function of the city and the development of the city as a cultural destination for its communities and visitors.
 - The acceptability of the scheme in design and heritage terms including the impact on the designated heritage asset whether the public benefits outweigh any harm.
 - The impact on the World Heritage Site and relevant LVMF views
 - The impact on any non-designated heritage assets
 - The impact of the proposal on neighbouring amenity.
 - The impact of the proposal on daylight and sunlight to surrounding dwellings.
 - The impact of the proposal on any archaeology beneath the site.
 - The accessibility and inclusivity of the development.
 - The impact of the proposal in highway and transportation terms.
 - The impact of the proposal in terms of energy and sustainability.
 - The impact of the proposal on the public realm.
 - The impact of the proposal on air quality.
 - The requirement for financial contributions and other planning obligations.

Principle of Development and Land Use

Principle of Development

69. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
70. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 540,000 people pre-Covid.
71. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.
72. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
73. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

74. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place, and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening, and a radical transformation of the City's streets in accordance with these expectations.
75. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
76. The London Plan projects future employment growth across London, projecting an increase in City employment. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
77. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
78. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
79. The draft City Plan 2036 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

80. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place, and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening, and a radical transformation of the City's streets in accordance with these expectations. These aims are reflected in the Corporation's 'Destination City' vision for the Square Mile.
81. The scheme meets the aims of policies in the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2036 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and employment in line with the aspirations for the CAZ and the requirements of the Local Plan and emerging City Plan. The proposed development would result in an additional 1141 sqm GIA of high quality, flexible Class E Office floorspace for the City, thus contributing to its attractiveness as a world leading international financial and professional services centre.

Office Provision

82. Policy E1 of the London Plan (2021) explicitly supports increases in the current office stock. Likewise, core strategic Policy CS1 of the Local Plan 2015 and strategic Policy S4 of the draft City Plan 2036 seek to ensure that the City provides additional office accommodation to meet demand from long term employment growth, and that new office floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs of SME's, startup companies and those requiring move on accommodation.
83. The existing site provides a total of 20,632 sq.m GIA of Class E office floorspace.
84. The scheme would deliver 2,057 sq.m uplift in office (Class E) floor space (GIA). The proposed uplift would be partly derived from the proposed extensions but would mostly occur due to the proposal to convert an existing 2,381sqm gym (also Class E) on the lower ground level to office space. The increase in office use floor space is welcomed in accordance with Core Strategic Policy CS1 to increase the City's stock and S4 of draft submission City Plan 2036.
85. The proposal includes a range of positive upgrades to the building which would allow for flexibility and would attract a range of different small and

medium sized business in accordance with Local Plan policy DM1. In particular, the purpose of the scheme is largely to improve entrances to the building, circulation spaces within the main reception and entry areas, to provide outdoor amenity spaces and to provide a more welcoming and flexible central reception hub.

86. The proposed scheme, along with previously consented refurbishment works relating to level 1 and 7, would lift the office accommodation from Grade B to Grade A quality. The proposed upgrades would bring the building back into optimal use, enabling the refurbished office building to compete with other new build Grade A office stock within the City.
87. The proposed and refurbished office floor space is well designed, flexible office accommodation in a well-considered building, with much improved sustainability credentials. The proposed uplift and internal upgrades in office floor space would contribute to meeting the aims of the London Plan for the CAZ and supports the aims of the Local Plan policy CS1, and draft City Plan 2036 policy S4. The office accommodation is in accordance with policy DM1.3 of the adopted Local Plan and policy OF1 of the Proposed Submission Draft City Plan 2036.

Retail

88. Policy DM20.3 of Local Plan 2015 and Policy R3 of the draft City Plan 2036 acknowledge the value of isolated retail units within the city, noting they provide local facilities for the City's workforce, enhance the City's vibrancy, and may serve the City's residential communities.
89. The scheme includes a new dedicated café space (Class E) within the southern pavilion extension on Portsoken Street which would be accessible to the public. A café in this location would help to activate the Portsoken Street frontage of the site where it is conveniently located opposite Portsoken Street Garden. The incorporation of such a use on Portsoken Street would help to make Ibex House more outwards facing and accessible for the surrounding community, not only the buildings own occupants.
90. A condition is recommended to be included on the planning permission, ensuring the dedicated café space proposed on the approved drawings is not converted to any other use within Class E, without permission from the Local Planning Authority.

Public House

91. Policy HC7 of the London Plan (2021) seeks to ensure public houses are protected where they have heritage, economic social or cultural value to local communities or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones. Likewise, Policy C1 of the draft City Plan 2036 seeks to ensure special

consideration is given to the protection of cultural facilities (including public houses) to maintain the City's unique cultural heritage.

92. The proposal includes the retention, internal expansion and external refurbishment of the existing public house known as the "The Peacock", which has laid vacant now for several years. This demonstrates a clear intention by the Applicant to conserve and enhance the existing pub which holds heritage value as part of Ibex House and has the potential to add further economic, social and cultural value to the local area if revitalised as proposed.

Culture – 'Learning Gallery'

93. Adopted Local Plan policy CS11 seeks to provide, support and further develop a wide range of cultural facilities and events in the City. Policy S6 of the draft City Plan 2036 seeks to enhance cultural experiences and access to a range of arts and heritage and includes a requirement for developers to submit Cultural Plans for major developments outlining how the development will contribute to the enrichment and enhancement of the City's cultural offer. These should set out how the development would contribute towards enriching and enhancing the City's cultural offer for example by incorporating cultural activities or displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.
94. The emerging Destination City strategy has ambitious targets to promote footfall and spend and to use the City as a brand to support this aim. The approach includes three strands to support success including: connectivity; wayfinding; and delivering world class events and activations. Integral to this is building a cohesive programme working with BIDS and potential partners.
95. A cultural provision of 161sqm GIA floorspace is proposed as part of the application.
96. The Design and Access Statement and subsequent Cultural 'Streamline Moderne Exhibition/Learning Centre' Statement set out the cultural strategy for the site which is intended to directly relate to the heritage significance of Ibex House and the Art Deco/Streamline Moderne movement.
97. The proposal includes a dedicated unit on the ground floor of the building in a prominent location on the corner of Minories and Portsoken Street. The space is intended to be used as a Learning Gallery with space assigned for an ancillary café and would be fitted to accommodate various exhibitions, events and workshops. More specifically, the unit is proposed to accommodate the following:

- A collaborative studio space for higher education and local community programmes and charities for the purpose of hosting workshops, lectures, seminars etc;
 - A gallery and exhibition space for local architects, artists and charities; and
 - An ancillary café space for visitors.
98. A detailed degree of space planning has been carried out and forms part of the subsequent Cultural 'Streamline Moderne Exhibition/Learning Centre' Statement to demonstrate how the space would be fitted out to accommodate the variety of activities described above.
99. The Applicant has been engaging with prospective interested occupiers and Officers have been kept informed on the progression of discussions. Initial meetings have occurred between a local community-focused organisation/architecture charity named 'STORE', with discussions on affordable lease terms scheduled to occur in late November and early December.
100. The Agent has also advised that interest from other organisations such as RIBA and the Aldgate BID has also been received. Notwithstanding this, specific occupier details will be secured at a later date as part of the S106 Agreement obligations.
101. The initial plan set out for the space will serve as a good foundation to form a more intricately detailed Cultural Plan and Cultural Implementation Strategy through Section 106 obligation. The strategy and implementation plan will be required to set out operational use and management details of the space.
102. Policies CS8 for Aldgate and CS11 of the 2015 London Plan and S6 of the draft City Plan 2036 and Destination City seek to enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage, and cultural experiences.
103. The Cultural 'Streamline Modern Exhibition/Learning Centre' Statement and its intended actions are welcomed. Full details of the plan and its implementation strategy are to be secured through the S106 agreement to ensure the benefits proposed are deliverable.

Architecture and Urban Design

104. London Plan Policy D3 and Local Plan Policy CS 10 advocate for a design led approach and optimisation of site capacity. The roof extensions and pavilions are well-designed and modest additions which balance delivery of additional floor space with heritage constraints. The proposals make an

effective use of limited land resource and enhance the buildings relationship with the adjacent public realm.

105. The roof top extensions would read as a series of integrated tiered additions to the main building which would remain below the existing maximum height of the building (49.8m AOD). The 8th storey level extensions to the east and west wings would connect into the existing centrally positioned commercial floor space and wrap around the unsightly service cores. At 9th storey level a further slender extension would sit between the cores set back significantly from the building line and the striking historic vertical glazed features “thermometer”.
106. These additions would partially conceal post war ad hoc roof top clutter and introduce sleek and complementary commercial floor space and roof terraces creating a cleaner roof silhouette in views. The extensions and this slight visual enhancement would be most apparent in the views from south and west, from Minories, Mansell Street/Haydon Street, Crosswall and King Georges Field. In longer views the extensions would be virtually imperceptible from Tower Hill, Tower Bridge and other riparian experiences.
107. The buildings around IbeX House are a mix of offices, hotels, serviced apartments and residential flats. Retail is located primarily at street level along Minories. There is little consistency in the age or appearance of the surrounding buildings, whilst heights range broadly from 5 to 11 storeys, with nearby taller buildings on Minories of up to 15 storeys. In both distant and local views, the visual prominence and level of change would be relatively insignificant in this diverse context blending into the urban layering of existing different building heights. The modest increases in massing would read as well integrated seamless additions with a design aesthetic and materiality referencing the existing distinctive streamline art deco architecture.
108. Equally, the ground floor pavilion extensions to the north and south elevations have been carefully conceived and sited to make use of existing refuse and service spaces. Following amendments these additions are now of a scale and footprint which is subordinate to the main building, and which does not dominate the composition of the historic building or townscape in approaches along Portsoken Street and Haydon Street.
109. The pavilions pull forward the building line in these areas increase glazing and redefine the entrances with accessible entry points resolving existing changes in level. The pavilions would replace back of house spaces within the existing carriageways and result in a more visually interactive ground floor accommodating additional offices entrances and a café to the south with an attractive aspect towards Portsoken Street Garden.

110. The minor remodelling to the ground floor of Minories would introduce a more symmetrical base, level access to the main office entrance and consistent stall riser height with increased glazing. This primary facade is bookended by two anchors, the remodelled former Peacock Pub” and the proposed cultural learning hub.
111. Collectively in the round the ground floor of IbeX House would make a more positive response to the public realm with a more active, usable, visually interesting and well-lit active frontage. In addition, passive natural surveillance would be increased for both day and night and existing awkward and anti-social recesses would be removed.
112. The proposed cultural space, remodelled public house, improved office entrances, increased amount of active frontage and a new cafe would refresh and add a new array of activities which would facilitate the diversification of uses and interest on Minories, Haydon Street and Portsoken Street. Public access to the cultural spaces and additional café to Portsoken Street would be secured via Section 106 and delivered in accordance with the Public London Charter, to ensure the highest level of public access and openness. The proposal would be in accordance with London Plan Policy D3 and D8 and Local Plan Policies CS 10 and DM 10.1.
113. The architectural quality and design detail of the extensions and adaptations to Minories have been meticulously designed to complement the existing building and are modelled on the 1930s art deco architectural character. The detailed approach has been informed by historical research and the new extensions on the ground and upper floors have been carefully designed to reflect the architectural language and materials of the existing building and the original design intent, but with a subtle contemporary interpretation clearly distinct and deferential to the host building. Key references are horizontality, the use of black faience, continuous crittall windows, curved corners and flat roofs. The proposals are considered to deliver exemplary design quality in accordance with policies CS10, DM10.1 D3 and S8.
114. M&E plant and building services would be upgraded within existing spaces at roof level. A large proportion of plant and services are integrated in the basement, relieving pressure on the top of the building to accommodate additional plant space. The existing rooftop plant would now be partially screened by the proposed extensions in accordance with Local Plan Policy DM10.1 and DM 10.3. Final details of the fifth elevation, plant enclosure and surface materials would be secured via a condition.
115. The proposals incorporate green infrastructure and roof terraces where opportunities are available on this constrained heritage site including terraces, planting and green roofs. Roof terraces have been designed with Policy DM 10.3 in mind, having regard for impact on rooflines/profiles,

historic/distinctive roofs and views. Planting is integrated to the flat roofs of the pavilions which would add a degree of softness to the street scene and would create a green corridor with Portsoken Street Garden to the south. Additional planting is proposed within the sunken lightwells to Portsoken Street supporting the wellness of occupiers. Final details, including planting palettes, specifications and fit out, are reserved for condition with the intent to optimise the inherent biodiversity and wellbeing benefits.

116. Servicing spaces, refuse storage and disabled parking bays are off street and discreetly positioned on Haydon Street and Portsoken Street slotted into the spaces between the new pavilion and existing IbeX House. The location would have a minimal visual impact on the street scene and would not detract from the quality of the listed building and the pavilion proposals.
117. There would be integrated "IBEX" signage above the three new entrances to Portsoken Street and Haydon Street. These would be back lit art deco letters signposting the remodelled entrances and the design intention would take cues from the art deco character of the building. A signage strategy for all other uses would be required as a condition to ensure consistent approach to location, lighting, and style. However, it is noted a separate application for Advertising Consent would be required prior to the installation of any signs.
118. Improvements to the public realm on Portsoken Street & Haydon Street include re-paving the frontage to the proposed entrances, a 'carpet' of paving across a raised table linking the Portsoken Street entrance to Portsoken Street Garden, and creating an accessible entrance to the building off the Minorities pavement. Additional enhancements are proposed to the Portsoken Street boundary wall and planting to Portsoken Street Garden. The hard brick boundary will be replaced with a more transparent treatment providing a greater visual connection between the public sunken garden and Portsoken Street. These changes would enhance the quality of routes around IbeX House. These more pedestrian-focused streets which promote active travel and are comfortable, convenient, safe and attractive, are in accordance with London Plan Policy D8. Furthermore, a public realm management plan, secured through s.106, would ensure that the enhanced routes and spaces are delivered and maintained in accordance with the principles of the Public London Charter.
119. The refreshed public realm would comprise a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Technical Guide, with final detail reserved for condition.
120. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting context and enhancing

the unique character of the City by night. Irrespective of the approved drawings, a detailed Lighting Strategy would be subject to condition to ensure final detail, including form, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy. The intention of the final proposals would provide low level illumination to architectural and landscape features, to enhance the pedestrian experience and improve safety.

Conclusion on architecture and urban design

121. The overall vision for the proposed development would be a sensitive and discrete multi-layered refurbishment with extensions. The approach is appropriate in terms of height, form, massing, scale and detailed design, would add a level of richness and visual interest to the local townscape and would support the emerging vitality of Ibx House and in turn the wider area. Final materials and details would be the subject of conditions. The proposal would also optimise the use of land of a constrained site delivering high quality office space and community facilities, whilst improving the buildings interface with its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy.
122. It is considered the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS 10 and DM 10.1, emerging City Plan Policy S8 and DE2, and London Plan D3, D4 and D5 and policies contained in the NPPF and guidance in the National Design Guide, contextualized by the London Plan Good Growth objectives, GG1-6.

Heritage Impacts

123. The proposal has been assessed against Local Plan Policies CS12, DM 12.1, DM12.2 and DM 12.3, draft City Plan 2036 policies S1 and HE1, and London Plan Policy HC1 and the relevant NPPF paragraphs 199-208.
124. There has been special regard to the desirability of preserving Ibx House and its setting and any features of special architectural or historic interest which it possesses, under s.16 and s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.
125. Evolution of the proposals has reduced heritage impacts to address officer and consultee objections including reduction of demolition; the scaling back of the ground floor extensions; the reuse of historic materials including faience and railings where feasible; the refinement of design detail; increasing the level of public access; and re-provision of the public house.

126. As set out in the consultation section of this report, Historic England and the Amenity Societies were consulted. Historic England the 20th Century Society raised concerns with the original iteration of the proposal in late 2021. Following receipt of amendments to the scheme in October 2022, Historic England advise the proposals address their concerns and their objection has been withdrawn. No further comments have been received from the 20th Century Society.

Ibex House (Grade II) Heritage Significance:

127. Built 1935-37, to the designs of Fuller Hall and Foulsham Architects, it is a seminal City building and important example of an interwar commercial building at a London-wide and National level. It is an early example of a modern speculative office block in the then emerging 'moderne' manner emanating from design schools on the European continent. It would have appeared quite striking and bold at the time in a City market since dominated by traditional styles and material expression. Built at a monumental scale quite new to the City, it incorporated a whole City Block, liberated in height terms by the emergence of steel and reinforced concrete, it's external adoption of the fashionable 'streamline moderne', comprising long rectilinear and curved 'strip' steel windows and a mix of elegant 'biscuit' and black-coloured faience, would have been radical and provided a clear contrast of modernity with the traditional City livery of classism and Portland Stone. The flush 'Crittall' continuous bands of steel windows, the longest unbroken length being 70ft, are said to have been the longest in Britain on completion and were part of a wider plan form which sought to maximise natural light into the depth of a (then novel) open plan floorplate.

That floorplate, with generous columnar spacing, was facilitated by structural innovation, and in a move anyway from post and beam construction, it is said to be the first flat-slab concrete structure with mushroom columns. The distinctive 'H', or 'dumbbell', architectural plan form facilitated the London Country Council's off-street servicing requirements, whilst allowing for a greater aspect and natural light and offered a more generous form to show off its elegant architectural stylings.

The proposal incorporates an earlier public house, 'The Peacock', into the overall design.

Its significance is principally architectural and artistic and to an important but lesser extent historic. These derive from:

- A rare and unique survivor of the streamline moderne style, influenced by architects like Eric Mendelsohn and the work of Luckhardt and Anker and the evolving fashion of the Art Deco 'ocean linear' idiom.
- A unique historic example of the emerging interwar trend for large open plan speculative office space, skilfully resolved on a dense urban site to

incorporate generous aspect and natural light alongside servicing requirements and with architectural panache.

- Structural and material innovation in the superstructure and use of elegant external skin facings.
- Incorporation of earlier licensed premises, 'The Peacock', in a moderne streamline interpretation of a traditional public house guise, such uses contributing to the historic mix of fine grain uses in the City edge (outside the historic walls). A rare and unique public in a moderne style at a City and London level.

128. On the whole, these heritage values derive from the physical fabric and architectural form, as expressed through the external skin and plan form, and to a lesser extent its super structure.

Contribution of Setting:

129. Elements of setting make a modest to moderate contribution to significance, most of which is intrinsic to the physical fabric and plan form. The setting of IbeX House has evolved significantly since it was built, and much of the original historic setting lost, to its detriment, diluting the overall contribution of setting to significance.

130. Those elements making a contribution to significance and an appreciation of it are:

- The clear contrast in scale and style between IbeX House and the surrounding finer grain, often more domestically scaled and historicist architecture, in particular where part of the city-edge historic architecture survives and provides a clear contrast which accentuates the monumentality of IbeX House as an edifice. This makes a moderate contribution to significance, in particular an appreciation of it.
- Those surrounding historic street alignments and, where it survives, historic building lines, which create that hierarchy of the facades and its response to its dense urban context. This makes a more modest contribution to significance and an appreciation of it.

Direct Impacts on Designated Heritage Assets: IbeX House

131. Roof extensions: The scale and form of the roof top extensions are well designed and deferential to the existing building composition. Like the pavilions the design detail would reflect the intrinsic artistic and architectural values of IbeX House. Any harm arises from the loss of parts of the historic floor slab and the removal of a horizontal roof light which is of modest interest and these impacts are relatively minor and not considered to be adverse.

132. Pavilions and lower ground level: The proposed single storey glazed pavilions would extend over part of the original carriageways and lightwells to the north and south introducing new fully accessible entrances to reception spaces and a public café to the south and the existing ad hoc arrangements to cycle parking, servicing and refuse storage would be resolved.
133. These have been thoughtfully designed and refined through the application process to mitigate harm to architectural and artistic significance. The smaller footprint and set back from the existing building line is now deferential to main building. The historic H plan is more legible; part of the lightwell to the southern aspect is retained; structural components would be preserved and less of the external skin removed. Fabric components would be partially retained and expressed within the new interior spaces of the southern pavilion. The extensions would be meticulously designed and reinterpret the moderne streamline features including crittall glazing, curved corners, black faience. At the same time there would be a subtle contemporary interpretation clearly distinct yet subservient to the main building.
134. There would still be some minor diminishment of the original artistic and architectural design intent in some areas of high and moderate heritage value. The historic carriageways, boundary wall and railings would be removed and the compositional arrangement of H- plan set back, lightwells, and former vehicular arrival points would be remodelled. The pavilions would obscure part of the ground floor elevation and require the dropping of cills, punching through of faience and removal of windows to create connections between the pavilions and the main building. The delivery of level access into the building would also require the loss of the historic entrances and steps. These interventions would slightly erode physical fabric and the plan form as well as partially obscure the ground architectural form in areas of high and moderate heritage significance.
135. The internal alterations to the ground and lower ground levels affect areas which are of lower heritage significance. There would be some breaking through and repositioning of the concrete floor slabs to improve access, create a more open plan arrangement and improve circulation as well as increase light quality. The extensions at lower ground level into the lightwell areas and related excavation would also require demolition of some external facing materials and windows but the superstructure and columns would be retained and there would be clear a sense of the historic building line. The demolition in these areas has also been reduced. These are areas which have been extensively altered and refurbished and are of low heritage significance, and the impacts are not considered to be harmful to architectural and artistic values.
136. Roof extensions: The scale and form of the roof top extensions are well designed and deferential to the existing building composition. Like the

pavilions the design detail would reflect the intrinsic artistic and architectural values of Ibex House. Any harm arises from the loss of the historic floor slab and the removal of a horizontal roof light which is of modest interest and these impacts are relatively minor and not considered to be adverse.

137. Minorities elevation ground floor: The ground floor elevation has undergone numerous changes over the years. Notwithstanding this the elevation and the ground floor are intrinsic to the artistic and architectural values and of high heritage significance.
138. The proposals would introduce a consistent building line and design approach removing unsympathetic later interventions. A more active elevation would be created with increased glazing and improved level access to the main entrance. Key features such as the curved corners, streamline appearance and black faience would largely be retained and or reinstated.
139. The former public house use on the north corner of Minorities/Haydon Street would be preserved at ground and lower ground. Externally the art deco character of the drinking establishment is well preserved as an inward-looking public house with high cills and crittall window to Minorities and Haydon Street. Internally the building is much altered other than a sense of a small cellular floor plan at ground level.
140. The existing window to Minorities would be removed and cill lowered to align with the wider stall riser datum to this elevation and clear glazing introduced. The Haydon Street elevation, original keg chute and corner entrance location would be preserved. Internally existing historic walls would be opened up, and the public house use would be extended into the adjoining unit and become open plan. The interiors which are of low heritage significance would be entirely refurbished including a new staircase inserted to lower ground level.
141. This would be a modernisation of a unique historic public house integral to Ibex House which is rare in the City of London and London. The proposals would slightly diminish the intrinsic architectural character, and external art deco style of this public house typology and there would be some minor loss of physical fabric and original design intent.
142. Interior fit out: The proposed interior fit outs to the public house, café, cultural use, reception, and remodelled office spaces would take their design cues and material choices from the iconic art deco building which would reinforce the distinctiveness of Ibex House. The final details would be covered by a condition.
143. Terraces and repairs: The current terraces are not accessible to the tenants because the existing balustrades height do not comply with the current

building regulations. The proposed works aim to replace the existing metal balustrades with a new detail which provides the adequate level of safety whilst and maintaining a consistent architectural language of IbeX House. Existing poor quality aluminium windows at ground and on the upper floors would be replaced with double glazed crittall windows and finished in green to match the approved window replacement programme. Faience repairs will also be undertaken as required details which will be secured by condition. These elements would all enhance the artistic and architectural values and moderne style of IbeX House.

144. Reuse of materials: Where there is demolition and loss of historic fabric including faience and railings these materials will be carefully dismantled and reused where possible for example for the terraces and new extensions. A condition will require a method statement to control dismantling, storage and monitor opportunities to reuse fabric and reduce waste.
145. Signage: A backlit "IbeX" art deco signs are proposed to be installed along the canopy edges at the proposed Minories main entrance and to the new entrances to the pavilions on Haydon and Portsoken Street. This would complement the artistic values and moderne art deco style.
146. The proposed development is underpinned by an overarching objective to revitalise and celebrate IbeX House as an iconic and unique building and reclaim its prominence and presence within the City of London with increased public access, repairs and sensitive refurbishment. The delivery of the proposals would result in minor adverse impacts to areas of high and moderate heritage significance. The harm derives from the pavilion extensions and the changes to the public house. There would be some slight erosion of the physical fabric and features through minor demolition and to the architectural form and original plan through the obscuration of parts of the building. For the most part however the overall artistic, architectural, and historic values are preserved and in parts are enhanced. These minor adverse impacts would cause a low level of less than substantial harm.

Indirect impacts on other designated heritage assets

Tower of London World Heritage Site and Outstanding Universal Value

147. The seven overarching attributes of Outstanding Universal Value are contained in the Statement of Outstanding Universal Value, itself contained in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to each attribute. It is considered that three attributes are of relevance to assessing the impact of the proposal in terms of: (i) an internationally famous monument, (ii) landmark siting and (iii) physical dominance of the White Tower.

148. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. Ibex House is not in the designated local setting (as identified in Figure 4 of the WHS Management Plan) but is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations and where relevant assessed here together.
149. There are two views within the London View Management Framework which are relevant to the considerations of impact on the World Heritage Site for this application, Tower Bridge (10A) and City Hall (25A) and these are considered in detail in the Strategic View Section.
150. Other designated heritage assets: There are no other designated heritage assets in the locality where there would be an impact on setting and significance.

Non designated heritage assets:

151. The Writers House Haydon Street: Its significance is derived from its evidential and architectural values which provide a link with the former industrial activities which once characterised this part of this City. The Victorian warehouse with punched masonry and generously proportioned windows are distinctly non domestic and more unusual within the City of London. Archaeological values derive from standing fabric in its walls from the former Abbey of St Clare. The setting of Writers House has changed significantly. Elements of setting which make contribution to significance are limited to surrounding historic street arrangements and building lines where these still exist. The extensions and alterations to Ibex House are self-contained and of scale and design which would be neutral and not detract from significance or setting.

Strategic Views

LVMF 10A.1 – River Prospect, Tower Bridge (Upstream, North Bastion)

152. This is also identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge).
153. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It also states that the middle ground includes

the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as the spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background include the Cannon Street Station towers, BT Tower, Centre Point and the Tate Modern (para 182).

154. The proposed roof extensions would be virtually indiscernible within this view and the appreciation of the dominance and pre-eminence of the ToL as a Strategically Important Landmark, or other identified landmarks and would preserve the appreciation of the OUV, the attributes an internationally famous monument, landmark siting and the physical dominance of the White Tower, its integrity and authenticity. In this regard, the proposed extensions would not conflict with London Plan Policies and HC2, Local Plan Policy CS 13 (1), draft City Plan Policy 2036 and guidance contained in the LVMF SPG and the LSS.

LVMF 25A.1-3 – Townscape View, Queen's Walk

155. This view is identified in the Tower of London WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is the Tower of London, which is the sole Strategically Important Landmark, inclusive of a Protected Vista, the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument, Tower Bridge are also identified as landmarks and Port of London Authority is an identified building.
156. The height of the roof extensions would be below the threshold for the background consultation area from the viewing location at 25A. In the kinetic sequence of views (25A.1- 25A.3) the extensions would be virtually indiscernible positioned either behind the tree line canopy or absorbed into a background of taller buildings. The impact on the Protected Vista and Protected Silhouette would be negligible.
157. The proposed extensions would not harm the characteristics and composition of this strategic view and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks. In this regard the proposed extensions would not conflict with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LVMF SPG.

Other World Heritage Site views: Dynamic Journey across Tower Bridge

158. The experience is identified in the Local Setting Study as Route 14 of the Approaches and Arrivals (Section 5), which acknowledges the overlap between these local views and the River Prospect at LVMF 10A.1. The identified aim is 'to create views in which the Tower of London is perceived as a riverside gateway lying at the edge of the City rather than 'lost in the City'; in which the scale of the White Tower is perceived as more prominent as than the building surrounding it; and in which the military architecture of the Tower and its defences can be appreciated'.
159. The proposed roof extensions would be virtually indiscernible and have a negligible impact in this kinetic sequence. The White Tower is considered to retain its prominence and the presence of the military architecture and defences of the WHS remain undimmed by the proposed building.

Conclusion – Impact on Tower of London World Heritage Site:

160. The proposals would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF. In all other views, including the relevant approach and relevant representative views, it is considered in line with the WHS SPG that the scale of change in all instances it is deemed to be virtually indiscernible and impacts negligible. Overall, it is considered that the proposals would not harm the attributes of the OUV or any of the components, authenticity, or integrity of the WHS, preserving its significance.
161. The proposed building would therefore comply with London Plan Policies HC2 and HC3, HC4 which seeks to ensure the implementation of the LVMF. Local Plan Policies CS12 and CS13 of the City of London Local Plan and draft City Plan 2036 policies S11, S13 and HE3.

Heritage Impact Conclusion

162. The proposals have been assessed against Local Plan Policies CS12, DM 12.1, DM 12.2 and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. There has also been special regard to the desirability of preserving IbeX House including its setting and any features of special architectural or historic interest which it possesses, under s.16 and s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.
163. The proposals are well conceived and meticulously designed to mitigate harm to the significance of the building as far as possible. The proposals have been supported by clear and convincing justification to sensitively adapt IbeX House to be more accessible, improve operational performance and the quality of external and internal spaces. The proposed designs have been informed by historical research and significance assessment of the building. Features, details and architectural language identified as original or having historic significance are largely retained and carefully considered in the

proposed scheme. Generally, it is considered that the proposed scheme will regenerate the appearance and the setting of this listed building.

164. The delivery of the proposals would result in some minor adverse impacts to areas of high and moderate heritage significance. The harm derives from the pavilion extensions and the changes to the public house. There would be some slight erosion of the physical fabric and features through minor demolition and to the architectural form and original plan through the obscuration of parts of the building. For the most part however the overall artistic, architectural and historic values are preserved and in parts are enhanced. These minor adverse impacts would cause a low degree of less than substantial harm. These elements of the proposals would therefore draw conflict with Policy DM 12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).
165. The heritage policies in the London Plan (in particular HC1) and in the Local Plan do not incorporate a balancing exercise as found in paragraphs 202 (relating to designated heritage assets) and 203 (relating to non-designated heritage assets). As a result, if a proposal results in any harm to the significance of a heritage asset, even if less than substantial and at the very lower end of the scale, will result in conflict with heritage policies.
166. The heritage balance must therefore be struck in order to form a conclusion as to whether there is compliance with the development plan when considered as a whole. For reasons summarised elsewhere in this report, in this case the public benefits clearly outweigh the low-level degree of less than substantial harm and as such the development would comply with the plan as a whole, notwithstanding conflict with Policy DM 12.3 and London Plan Policy HC1.
167. With regard to designated heritage assets, Paragraph 202 of the NPPF states "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". Therefore, an evaluation of the public benefits and the weight afforded to them has been undertaken. It is considered the proposals would result in public benefits, which would outweigh the harm identified.

Archaeology

168. Policy DM12.4 of the Local Plan 2015 and policy HE2 of the draft City Plan 2036 outline the requirements with regards archaeology, outlining that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.
169. The site is in an area where Roman, medieval and post medieval remains may be expected to survive. An Archaeological Desk Based Assessment has been submitted with the application. There is high potential for the survival of

Roman remains including burials and funerary monuments as the building is within the Eastern Roman cemetery in an area where extensive burials have been recorded. The north-west area of the site is on the route of a Roman road and there is potential for remains of the road and roadside ditches to survive. There is potential for survival of medieval remains and a high potential for post-medieval remains including evidence of buildings and structures.

170. The proposed scheme includes an extension to the basement, lower ground and ground levels on the north and south elevations of the building. The proposals and construction of new foundations would remove all archaeological remains within the footprint of the extensions.
171. Archaeological evaluation is required to provide additional information on the date, nature and character of surviving archaeological remains, including survival of any burials and to inform a programme of archaeological work.
172. The proposals are acceptable in archaeological terms subject to conditions to cover archaeological evaluation, a programme of archaeological work to record any archaeological evidence revealed, and foundation design.

Access and Inclusive Design

173. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan and Policy D5 of the London Plan. In addition, the Local Plan Policy DM11.3.
174. The application is supported by a Design and Access Statement and supplementary material. Detailed consideration has been given to access issues in the design of the scheme.
175. The amendments to the proposal received in October 2022 included the provision of level access from the primary frontage of the site on Minories. This is a significant positive improvement to the existing building given level access is not currently possible, resulting in the need for a portable ramp to be deployed at the request of people with limited mobility.
176. Level access provision (via internal platform lifts) is also proposed within the ground floor extensions on Portsoken Street and Haydon Street. This would ensure all main entrances to the building are fully accessible and inclusive.
177. The scheme would deliver 20 long stay larger cycle spaces, achieving the 5% of the overall long stay cycle parking provision, required by the policy T5B of the London Plan 2021.
178. The scheme would also provide two on-site blue badge car parking spaces to be accessed from Haydon Street. The provision of on-site blue badge car

parking is responsive to Policy T5 of the London Plan and would improve the inclusive design credentials of the site.

179. As the cores of the building have recently been upgraded as part of the interior works approved in 2021 (under Application ref: 20/00990/LBC), no works are proposed to the lifts serving the development. Consequently, the proposal does not provide new facilities for dignified emergency egress in relation to Policy D5 of the London Plan 2021. Given this and given the constraints associated with the listed status of the building, the lacking provision of new emergency lifts is acceptable in this instance, and it is noted the proposals would not worsen dignified emergency egress conditions. The proposals are therefore in accordance with policy.
180. The City's Access Officer is supportive of the proposal. Further details are recommended to be required through conditions to ensure internal facilities (i.e., shower and WC layouts etc) meet the highest standards of accessibility and inclusive design.
181. Therefore, subject to conditions, the development is compliant with policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and Policy D5 of the London Plan. In addition, the proposals comply with the relevant parts (accessibility) of Local Plan Policy DM11.3.

Transportation and Highways

Public Transport and principle of development

182. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The site is located within short walking distance of Aldgate underground station and Tower Hill underground station and is within a 15-minute walk of Liverpool Street Station. Several bus routes run close by on Minories and Aldgate High Street. Accordingly, the site is considered suitable in principle for the proposed type and scale of development.

Cycle Parking

183. London Plan Policy T5 (Cycling) requires cycle parking to be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
184. Currently, 89 cycle parking spaces are provided externally within the privately maintained forecourt areas off Portsoken Street and Haydon Street. These existing facilities are all provided in the form of wall hung spaces with no shelter provided from the elements. Accordingly, the existing cycle racks are not considered to provide an accessible, secure or sheltered cycle parking

offer to those wishing to cycle to the site, particularly for long-stay trips. The proposed development would greatly improve the cycle parking provision and associated facilities within the building delivering a total of 333 long-stay spaces which exceeds the London Plan standards even when applied to the building as a whole and would result in a significant uplift to the total on-site provision. This is shown in the table 5 below:

Table 5: Cycle Parking standards

London Plan long stay cycle parking requirements	Existing cycle parking (long stay and short stay)	Proposed long stay cycle parking	London Plan short stay cycle parking requirements	Proposed short stay cycle parking
318	89 external spaces	333	53	43

185. Long-stay cycle parking is proposed to be provided at the ground floor and basement levels. Access to the cycle parking area would be via a staff entrance located east of the proposed servicing bay, to be located off Haydon Street. The basement cycle parking area would be accessed via a lift which would be sufficient in size to accommodate more than one bike without the need for them to be lifted up and down. This is in accordance with London Cycle Design Standards (LCDS).
186. The proposed cycle parking would be partially two-tier (66%), part semi-vertical (18%), part foldable (10%) and part wide-spaced Sheffield stands (6%). The mix of stands and their layout works within the constraints of providing such spaces within an existing building and is acceptable.
187. Further, at least 5% of cycle spaces would be suitable for larger adapted cycles (in line with the London Plan Policy T5 (Cycling), London Cycling Design Standards 8.2.1, and the draft City Plan 2036 6.3.24).
188. Twenty Short-Stay cycle parking spaces via 10 Sheffield stands are proposed within the curtilage of the site along the Portsoken Street frontage. Additional short-stay cycle parking spaces for the office use is proposed to be located within the buildings internal cycle store. Given the overall lack of curtilage available this arrangement is considered acceptable, and the proposed spaces would significantly improve the short-stay provision for this site. Further details of the visitor access strategy for the short-stay provision within the internal cycle storage area will be secured within the Cycling Promotion Plan to ensure it provides an attractive and convenient offer.
189. The proposals include 30 showers and 300 lockers which complement the cycle parking provision and would be directly accessible from the cycle

storage area. This is a significant improvement over the existing which offers no provision.

190. The applicant would be responsible for promoting the use of the cycle parking spaces and as such will be required through a Section 106 obligation to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It will be submitted to the City for approval in line with the London Plan Policy T4.

Car parking

191. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2036 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces. The proposal complies with these policies as the development is proposed to be car free, except for the provision of two on-site blue badge car parking spaces, accessed from Haydon Street.

Servicing and deliveries

192. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.
193. Currently, the majority of servicing takes place on-street from Haydon Street. Servicing and delivery vehicles are typically not able to turn around in Haydon Street thus resulting in drivers having to reverse out of Haydon Street onto Minorities. This arrangement is highly undesirable and presents a risk to all road users (cyclists, pedestrians and vehicle drivers).
194. The proposals seek to provide a new on-site servicing area to the eastern side of the proposed ground floor extension accessed from Haydon Street. Two on-site loading/unloading bays would be provided that can accommodate 4.6tn vans and 7.5tn hgvs. Within the Transport Assessment the applicant has estimated that the proposed development will have a requirement of 33 daily deliveries which will be commensurate to the existing use on site and can be suitably accommodated within the off-street facilities proposed. This number would be capped accordingly in the Section 106 agreement.
195. The proposed servicing area would not facilitate vehicles turning within the site and all servicing vehicles would be required to reverse into the off-street area in order to exit in a forward gear. This falls short of the requirements laid out in Policy DM16.5 which require servicing areas to facilitate both access

and egress in a forward gear. The reversing manoeuvre would however be significantly shorter and safer than the existing situation on Haydon Street. Vehicular traffic along Haydon Street is low and servicing activity would be restricted to ensure there is no conflict with pedestrians or cyclists during the Peak AM, Lunch and PM periods. It is not considered that this arrangement would pose any undue risk to highway safety as a result.

196. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has requested a minor variation to the peak hour restrictions mentioned above to enable servicing for the café and pub only use between 7am and 8am. This requested variation is considered to be necessary and reasonable for the purposes of ensuring the operational needs of all uses on the site can be met. This is recommended to be subject to a cap of two deliveries. It is further noted the Applicant has not objected to a night-time servicing condition.
197. The recommended conditions with respect to servicing hours outside of peak hours and during night-time hours would significantly improve existing conditions whereby servicing currently occurs unrestricted, on street.
198. The development will be required to produce a delivery and servicing plan (DSP) which will be secured by Section 106 obligation. This will be required to include a suitable consolidation strategy and the operation of a booking system to reduce overall servicing trips to and from the site and the Applicant has agreed to this requirement.

Trip Generation

199. A trip generation assessment has been conducted for the site. The assessment has been carried out using TRICS data from the higher of two comparable sites. On this basis, the submitted Transport Assessment predicts the development would generate 33 delivery and servicing trips, most of which are envisaged to comprise of van deliveries.
200. Further details of a proposed booking system to manage use of delivery bays is recommended to form part of a deliveries and servicing management plan secured under the S106 Agreement.
201. A Section 106 obligation requiring a detailed Travel Plan is recommended to be secured. This would outline a clear package of measures the scheme will implement in order to encourage visitors to undertake trips via sustainable modes.

Public Realm and S278 Agreement

202. Although not limited to, the following works shall be included within a Section 278/S72 Agreement:

- Realignment and improvement of footways on Haydon Street;
- Reinstatement of vehicle crossovers as footway on Portsoken Street and modification of crossovers on Hayden Street;
- Alterations to Portsoken Street junctions to facilitate safer and easier pedestrian movement (e.g., a raised table).
- Provision of an upgraded, transparent wall, on the boundary between Portsoken Street and the adjacent public garden area (to be secured separately within the S106).

Transportation Conclusion

203. Subject to conditions and planning obligations, the proposal would accord with transportation policies including London Plan policies T5 cycle parking (long-stay), T6 car parking. It accords with the Local Plan 2015 Policy DM3.2, and the draft City Plan 2036 Policies AT1, AT2, AT3, and VT3.

204. Levels of short stay cycle parking on site would not achieve the London Plan standards for the overall level of floorspace provided however when considering the overall uplift in floorspace proposed and the limited space within the site and wider public realm, the shortfall in spaces is considered acceptable.

205. Overall, the proposal is considered acceptable in transport terms and offer welcomed improvements to the site with respect to servicing, cycle parking and blue badge parking. The proposal would deliver welcomed public realm improvements particularly through the introduction of footway widening on Haydon Street, a raised table on Portsoken Street and other associated improvements.

Waste Collection arrangements

206. Local Plan policies CS17 and DM17.1 require sustainable choices for waste and for facilities to be integrated into building design. Draft City Plan policies S16 and CE1 requires developments to consider circular economy principles.

207. The submitted Waste Management Strategy estimates two to three collections per day. The proposed waste storage would be located at basement level and would be internally transferred by site management to street level via a platform lift for collection from Portsoken Street.

208. The Cleansing Team have raised no objection to the proposed waste storage and collection arrangements. A further detailed waste management plan is recommended to form part of the Deliveries and Servicing Management Plan secured by the Section 106 Agreement.
209. The waste storage is considered to comply with Local Plan policies CS17 and DM17.1 and draft City Plan policies S16 and CE1.

Sustainability

Circular Economy

210. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that development proposals are expected to follow. Emerging City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.
211. The submitted Circular Economy Strategy describes the strategic approach to incorporating circularity principles and actions in line with the adopted GLA guidance on Circular Economy Assessments.
212. The existing building would be retained and adapted, including a variety of extensions each below the size of 1,000sqm, to provide better quality office, retail and cultural floorspace as well as internal and external amenity spaces with urban greening to support health and wellbeing of the occupiers.
213. The extent of demolition would be minimal, mostly internal fabric and services. Externally, windows and balustrades at the top levels and lower levels would be replaced, some existing roof level elements, roof lights and fabric around the existing side entrances demolished to create the proposed roof level and lower levels extensions. Some of the faience cladding may require repair and replacement. Any new materials are intended to be sourced responsibly and ethically, with high recycled content where possible. A pre-refurbishment audit will be undertaken to identify and quantify waste materials, establish re-use and recycling opportunities. A material audit is recommended to be secured via a condition of the planning permission
214. A post completion Circular Economy statement in line with the mayor's guidance on Circular Economy Assessments to confirm how circularity has been incorporated into the refurbishment scheme is recommended to be secured by condition.

Operational Energy Use and Co2 Emissions

215. The operational energy strategy has been developed based on treating the whole building proposals as a major development that therefore requires compliance with the London Plan policies. The strategy demonstrates that the

development has been designed to achieve an overall 36% reduction in regulated carbon emissions compared to a baseline building model representing the performance of the existing building, based on SAP 10 carbon factors as required by the GLA.

216. With regard to energy demand reduction, the proposals allow for limited scope for upgrading existing fabric, however, high performance glazing, façade and roof elements to limit solar gain and increase thermal insulation would be specified. Existing, in recent years refurbished main ventilation plant and air handling units with heat recovery would be retained, supported by new high efficiency fans and fan coil units for the mechanical ventilation. In addition, a new air-to-water heat pump chiller would supply the air handling units to provide active cooling.
217. Space and water heating would be provided by electric means via new fan coil units for the majority of the existing floors and the extension, while the remaining gas boilers on two of the existing floors will be phased out when vacant possession is available.
218. The proposed energy demand reduction strategy would reduce the whole building's operational carbon emissions by 36% compared to a Building Regulations compliant building.
219. There is currently no available district heating network close enough to the site. The opportunity to connect to a future district heating network would be incorporated into the proposed development at basement level.
220. Renewable energy technologies to provide space and water heating have not been integrated into the proposals due to the existing MEP being still in good working condition. The applicants do not consider the installation of PV panels on the roofs to be practical due to space, weight, overshadowing and heritage constraints.
221. Carbon emissions from unregulated energy uses, such as lifts, appliances and IT equipment, would be reduced through the provision of practical guidance from skilled facility managers to the occupiers.
222. The site-wide energy strategy would result in a high level of carbon emissions savings from energy demand reduction measures. Overall, the strategy complies with the London Plan carbon emission reduction targets for major new developments, and therefore the strategy exceeds expectations for a refurbishment scheme.

BREEAM

223. A BREEAM UK Non-domestic Refurbishment and Fit-Out 2014 pre-assessment has been prepared. The proposed development currently would achieve a “very good” rating but the project targets an “excellent” rating.
224. The assumptions made as part of the pre-assessment indicate that the proposals can meet all the mandatory level requirements for the current rating including a score of 55.92%, however, further credits are targeted that would potentially increase the score to 72.41% equivalent to an “excellent” rating. The scheme targets a high number of credits in the CoL’s priority category of Materials and would achieve approx. half of the Energy, Water and Pollution credits, as well as targeting the adaption to climate change credit in the Waste category which appears to be realistic considering the high level of retained fabric and building services.
225. A post construction BREEAM assessment is recommended to be secured by condition.

Whole Life-Cycle Embodied Carbon Emissions

226. A quantitative Whole-Life-Cycle carbon emissions analysis for refurbishment schemes without a major extension is not required by London Plan policies and therefore has not been submitted. A qualitative statement has been provided that describes the approach to reducing whole life-cycle carbon emissions that align with the circular economy principles summarised in the Circular Economy section of this report.
227. A post-construction Whole Life-Cycle Carbon assessment is recommended to be secured by condition.

Urban Greening and Biodiversity

228. Local Plan Policy DM10.2 encourages developments to install green roofs, Policy DM10.3 encourages high quality roof gardens and terraces and Policy DM19.2 encourages the inclusion of green roofs and walls, soft landscaping, and trees. Emerging draft City Plan policies OS2 and OS3 encourage high quality roof gardens and terraces and green walls and promotes biodiversity. Biodiversity measures are promoted through the City of London Biodiversity Action Plan 2021-2026.
229. The existing site is hardscaped with no planting. The proposed development would include green roofs, greening on terraces and winter gardens at the lower ground floor off Portsoken Street. The introduction of greening across the site is welcomed, particularly given the lack of greening which currently exists on the site.

230. An Urban Greening Factor (UGF) calculation based on the London Plan has been submitted. The UGF for this application has been calculated at 0.153 (London Plan) and 0.18 (City Plan) based on the information provided which does not meet the target in the London Plan of 0.3. The shortfall is acceptable in this instance, given the constraints associated with adapting a listed building.
231. Further greening on the central 9th level roof form was explored but was deemed by the Applicant's Engineer to be unsuitable as the central spine of the building cannot support the weight of a green roof. This further explains why the roof extensions are to be constructed of Cross Laminated Timber (CLT) to ensure structural loadings are within acceptable levels. Moreover, there are limited meaningful opportunities to install green walls on the building which wouldn't obscure features of the listed building, such as the beige faience, or obstruct ventilation and servicing louvres.
232. Reasonable effort has been made to improve urban greening and increase biodiversity levels on the site. The addition of green roofs, greening of the terraces and winter gardens on this development are welcomed not only for their aesthetic value when viewed from within the building and nearby buildings but also for their contribution to biodiversity and urban greening, rainwater run-off, insulation and urban cooling.
233. Further details of the quality and maintenance of the green roof areas and their contribution to biodiversity is recommended to be secured by condition.
234. Subject to conditions, the development is considered to accord with Local Plan Policy accord with policies DM19.2, DM10.2 and DM10.3 of the Local Plan.

Climate Resilience

235. The proposed development involves alterations and an extension to an existing building which largely remain in-situ. Therefore, it is acknowledged there are limitations in some aspects of improving climate resilience.
236. As noted above in this report, the Applicant is targeting a BREEAM 'Excellent' rating and has committed to completing a 'Climate Change Adaptation Strategy'. This is recommended to be secured by condition.

Heat stress

237. It is accepted that major works to the façades of the building is not viable due to the listed nature of the building. The proposals include references to natural ventilation, solar control glazing and subtle shading to mitigate overheating. Further details are recommended to be secured via condition to ensure such

measures are taken forward positively and not restricted (i.e. through sealing windows).

Flooding

238. The site is located in a Flood Risk Zone 1 (lowest risk) and is of minimal risks of surface water flooding. Flood risk to the site is not likely to be altered as a result of the proposed development. Notwithstanding this, the proposed green roof elements would have a beneficial impact on runoff rates, and it is acknowledged that further SuDs measures on this site are constrained due to the listed status of the building.

Natural Capital and Pest & Diseases

239. The proposed development would incorporate urban greening and enhance ecological value of the site by providing green roofs, green terraces and a new lower-level garden on the southern side of the building. The proposed greening on the southern side of the building, on the roof of the pavilion extension and within the adjacent winter gardens, are welcomed particularly given the proximity to Portsoken Street Garden, a proposed Site of Importance for Nature and Conservation (SINC). Further details on proposed biodiversity contribution measures are recommended to be secured by condition.

Sustainability Conclusion

240. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing.
241. The proposed sustainability strategy includes the retention of the building with minor demolition and individual new build elements below 1,000sqm in size. The scheme positively addresses the need to minimise operational and embodied carbon emissions and demonstrates improved climate resilience credentials of the building.

Daylight and Sunlight and Overshadowing

242. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.

243. The Housing Supplementary Planning Guidance (GLA, March 2016) sets out that an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations.
244. Local Plan Policy DM10.7 seeks to resist development that would result in unacceptable daylight and sunlight levels to nearby dwellings and open spaces taking account of the BRE guidelines.
245. Draft City Plan Policy DE8 requires development proposals to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of the Building Research Establishment's guidelines.
246. Both policies recognise that it may not always be practicable to enable ideal daylight and sunlight conditions in densely developed city-centre locations. Paragraph 3.10.41 of the Local Plan and Policy HS3 of draft City Plan state that the City will take into account the cumulative effect of development proposals.
247. Local Plan Policy DM21.3 seeks to protect the residential environment including daylight and sunlight to adjacent residential accommodation.
248. The BRE guidelines present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels) (a full explanation of the methodologies is provided in Appendix C):

Daylight

249. Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide recommends compliance with both the VSC and daylight distribution (NSL) guidelines.

Sunlight

250. Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south.

Interpreting results

251. In undertaking assessments, a judgement is made as to the level of impact on affected windows and rooms. Where there is a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions.

Overshadowing

252. The BRE guidelines suggest that the availability of sunlight should be assessed for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March. If as a result of the proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

Assessment

253. A comprehensive daylight, sunlight, overshadowing and solar glare assessment has been provided having regard to the BRE guidance (2011). Since the Assessment was undertaken, updated BRE guidance (2022) has been published; the Consultant has confirmed that this does not affect the calculations or conclusions in the report as the guidance for considering the effect on neighbouring properties and open spaces remains consistent with the previous version of the BRE Guidelines, which is accepted by Officers.
254. An addendum to the submitted Daylight and Sunlight assessment dated August 2021 was submitted in October 2022. The addendum provides advice on the potential impacts of the amended scheme which differs principally in terms of massing at the lower ground, ground and mezzanine floors. This advice deems the conclusions reached in the 2021 are still correct and true and the amended scheme remains BRE compliant.
255. A further addendum was received in November 2022 to include two additional residential properties at 50 Vine Street (28 flats) and 128-129 Minories (2 flats), in the daylight and sunlight assessment.

Residential properties

256. The neighbouring properties assessed for the potential impact on daylight and sunlight levels were at:
- Iveagh Court at 5 Hayden Street, London E18BQ;
 - Marlyn Lodge
 - Prospero House
 - River House
 - St Johns House; and
 - 128-129 Minories.
257. When assessed against the Vertical Sky Component and Annual Probable Sunlight Hours methodology, all properties would continue to receive daylight and sunlight in line with the numerical values set out within the BRE Guidelines.
258. When assessed against the No Sky Line methodology, one room from one property at 52-56 Minories which would experience a No Sky Line alteration of 20.7% (as opposed to 20%). This change would be negligible and is acceptable. The remainder of properties would comply with less than 20% No Sky Line alteration.

Overshadowing

259. Portsoken Street Garden is an area of public open space located to directly to the south of the site. This area of open space would not be shaded by the proposed development due to its location to the south of the proposed development. Therefore, there would be no adverse impacts caused, by way overshadowing, to this area of public open space.

Daylight, Sunlight and Overshadowing Conclusion

260. Taking into account the BRE Guidance and the site's location within a dense urban environment, it is considered the proposal would not result in any unreasonable and unacceptable impacts to nearby residential dwellings or open spaces.
261. The assessment results show that any daylight or sunlight reductions to the surrounding residential properties would continue to be within the BRE Guidelines and/or would be considered negligible and not noticeable to the occupants.
262. Overall, the impacts to the surrounding properties for daylight, sunlight and overshadowing are considered to be acceptable.

263. Therefore, the impacts as a result of the proposed development are considered to be in accordance with Local Plan Policies DM10.7 and DM21.3, Policy DE8 of the draft City Plan 2036 and London Plan policy D6(d).

Wind Microclimate

264. London Plan Policy D8, Local Plan Policy DM10.1 and Draft City Plan Policy S8 require developments to optimise micro-climatic conditions and not to result in unacceptable wind impacts. The proposed roof level extensions are infill extensions and would not increase the maximum height of the existing building. Therefore, in accordance with the City's Planning Advice Note, Wind Microclimate Guidelines for Development in the City of London, an assessment of the wind impacts is not required.

Contaminated Land

265. Local Plan Policy DM15.8 and draft City Plan Policy HL4 expects development to carry out detailed ground investigation to establish whether the site is contaminated.

The Applicant has submitted a Geo-technical and Geo-environmental Interpretive Report with the application. The results of the chemical analyses have indicated the samples tested to be free from elevated concentrations of contaminants.

266. The City's Environmental Health Department have not raised concerns with the proposal having regard to site contamination risks. The development is considered to comply with Local Plan Policy DM15.8 and draft City Plan Policy HL4.

Light pollution

267. Local Plan policies DM10.1 and DM15.7 and Draft City Plan policies HL3 and DE9 states developers must consider lighting impacts of development and reduce light pollution and light spillage from internal and external lighting.

268. A Lighting Strategy is recommended to be required as a condition to reduce negative impacts of artificial light, particularly to residential properties opposite. Subject to the reserved details, the potential impacts are not considered to be material.

269. It is further noted, the Applicant has advised the internal refurbishment of floors 1-7 (subject to separate Listed Building Consent) will provide for the installation of motion sensor controls for lights within the existing building and the also within the new floor space. This would improve the existing light pollution issues described within public objections to the application.

270. Subject to the recommended condition, Officers consider the development complies with Local Plan policies DM10.1 and DM15.7, and Draft City Plan policies HL3 and DE9.

Noise and Disturbance

271. London Plan Policy D13 requires the proposed development to mitigate noise-generating uses and Policy D14 aims to avoid significant adverse noise impacts on health and quality of life, and Local Plan Policies DM3.5 and DM15.7, seek to ensure that operational noise does not adversely affect neighbours. Policies S1 and HL3 of the Draft City Plan requires that noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.

272. The impact of the proposed development in terms of noise associated with the operational stage of the development would not be unreasonable. The proposed roof terraces would provide important amenity space for office workers and their use would be appropriately limited by the recommended conditions. More specifically, the Environmental Health team have been consulted and recommend a condition to restrict the hours of use for the terrace areas to be restricted between 7am- 9pm (Monday to Saturday). Further a condition is recommended to ensure no live or recorded music is played on the proposed roof terraces.

273. In respect to noise from plant equipment, an acoustic report has been submitted with the application. This indicates that plant could be operated without detrimentally impacting on neighbouring properties in respect to noise and disturbance.

274. Overall, subject to the recommended conditions, the development should not detrimentally impact on amenity of surrounding properties in respect of noise and disturbance. Therefore, the Proposed Development complies London Plan Policy D13 and D14, Local Plan Policies DM3.5 and DM15.7, and Policies S1 and HL3 of the Draft City Plan.

Overlooking

275. Policies DM21.3 of the Local Plan (2015) and Policy H3 of the draft submission City Plan 2036 require all developments to be designed to avoid overlooking and to seek to protect the privacy of adjacent residential accommodation. However, the policies recognise that due to the density of development in the City, it may not always be possible to entirely avoid any impacts on amenity.

276. Terraces currently exist on the 6th floor, 7th floor and to the north and south of the central spine on the 8th floor level of the building. New balustrading and

floor finishes are proposed to be installed to these existing terrace areas to ensure compliance with current building regulations. New terraces are proposed along the east and west of the proposed infill additions on the 8th floor and also around the proposed 9th floor level extension.

277. The terrace proposed for the 9th floor level of the building would be located approximately 23 metres and separated by a car park from windows and balconies associated with the residential dwellings at Marlyn Lodge, located to the east of the site. Similarly, a distance of 14m to Prospero House located to the south of the site and 16m to windows of dwellings at Iveagh House to the north of the site would be achieved. The new terrace would also be located higher than the top floor of these surrounding residential properties and would be setback from the building edge.
278. Whilst the new terraces would facilitate views towards neighbouring residential units, a sufficient distance between the terraces and these residential units would be provided. Overlooking would not be significantly worsened by the proposed terraces compared with that which occurs currently through the use of the existing terraces on the 6th, 7th and 8th floor levels.
279. Management restrictions, to be secured via the recommended conditions, would also help to minimise potential adverse amenity impacts. This includes the conditions recommended to be restrict hours of access to the terraces and those which prevent the use of amplified music on the terraces.
280. Subject to the recommended conditions, it is considered the amenity of adjacent residential occupiers, by way of privacy, would not be unreasonably reduced, in accordance with DM21.3 of the Local Plan (2015) and Policy H3 of the draft submission City Plan 2036.

Air Quality

281. Local Plan Policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.
282. The application includes an Air Quality Assessment which includes the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development. The assessment

concludes the proposed development would be Air Quality Neutral with regards to building emissions and transport emissions. Therefore, air quality impacts associated with the development would be negligible.

283. The City's Air Quality Officer has no objections to the proposals subject to a condition requiring the contractor to sign up to the Non-Road Mobile Machinery Register, to ensure emissions associated with construction and demolition are suitably reduced. Furthermore, a condition is recommended to require the submission of a report prior to the installation of any generator on the land, to ensure the generator does not have a detrimental impact on nearby residential occupiers in accordance with Policy DM15.6 of the Local Plan.

284. Subject to the recommended conditions, the proposed development would accord with Local Plan Policy CS15, policies HL2 and DE1 of the draft City Plan, policy SI1 of the London Plan which all seek to improve air quality.

Fire Safety

285. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage.

286. The application is accompanied by a fire statement which demonstrates how the development would achieve good standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

287. The City's District Surveyors were consulted and have reviewed the submitted Fire Statement. There were no objections to its contents. The proposed fire strategy is considered to comply with Policy D12 of the London Plan.

Suicide Prevention measures

288. Local Plan policy CS3 requires that security and safety measures are of an appropriate high-quality design. Draft City Plan Policy DE5 requires security and safety to be considered. The City recently adopted the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) which requires suicide prevention and safety measures to be considered and incorporated where necessary.

289. Balustrades proposed for both the existing and proposed terraces would be 1.2m in height. This is acceptable as a higher balustrade height would have townscape implications for the Grade II listed subject building. Alternative suicide prevention measures are therefore proposed:

- The terrace at the 6th, 7th and 8th floor levels would be overlooked by glazing from the offices, providing clear unobstructed natural surveillance to these areas; and
- The proposed roof terraces on the 7th, 8th and 9th floor levels are setback from the building edge providing a physical obstruction.

290. Due consideration has been given to suicide prevention methods and the proposal is considered to accord with Local Plan Policy CS3 and draft City Plan Policy DE5 and the recommendations of the Planning Advice Note

Health Impact Assessment

291. Policy HL9 of the draft City Plan 2036 seeks to protect and enhance people's physical and mental health, new development should be designed to promote physical activity and wellbeing, through appropriate arrangements of buildings and uses, access, increased green infrastructure, and the provision of facilities to support walking and cycling.

292. Policy HL9 of the draft City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities. Whilst a Health Impact Assessment was not required to be submitted as part of this planning application, the proposals have been considered with respect to the considerations of Policy HL9.

293. The proposals include several important upgrades to the existing office building which would help to enhance people's physical and mental health. This would be achieved by:

- The proposal to provide level access to the building from the existing main building entrance on Minories and the two proposed building entrances on Haydon Street and Portsoken Street.
- The proposal to provide additional and upgraded outdoor amenity space.
- The proposal to provide urban greening, visible from the office floor space, along with winter gardens at the south-facing lower levels of the building.
- The proposal to upgrade the fence separating Portsoken Street from the open space area at Portsoken Street Garden to increase transparency and visibility of the open space area.
- The proposal to provide up-graded office floor space with co-working areas and a publicly accessible café on Portsoken Street.
- The proposal to significantly increase and improve on-site cycle parking storage and facilities which would promote healthier methods of travel.

Public Sector Equalities Duty

294. In consideration of the proposed development, the Public Sector Equality Duty requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.
295. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-
- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
296. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
297. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
298. This application has been assessed against the Equality Act 2010 and any equality impacts identified.
299. As set out in the Statement of Community Involvement (SCI), the consultation process included a targeted programme, which sought to understand the views of the local community.
300. The Applicants have held meetings with or reached out to stakeholders and the following stakeholders are considered to be relevant in the context of the Equalities Act:
- i. Local Ward Members and Planning and Transportation Members;
 - ii. BID Manager at the Aldgate BID;
 - iii. Director at Studiomakers, an Outset Contemporary Art Fund (Registered Charity).
301. The section on Accessibility and Inclusive Design sets out how the scheme has been designed to be accessible to all. In addition the proposed development has been assessed against Policy GG1 of the London Plan and

would be considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Human Rights Act 1998

302. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).
303. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) or right to enjoyment of property (Protocol 1, Article 1) including by causing harm to the amenity of those living in nearby residential properties and student residential properties, it is the view of officers that such interference is proportionate, in the public interest and strikes a fair balance between the interests of the owner of the site, those living nearby and the community as a whole.
304. As set out above, it is the view of officers that there would be no infringement of Article 8 or Article 1 of Protocol 1 of the ECHR.

Public Benefits and the paragraph 202 balancing exercise

305. Paragraph 202 of the NPPF states "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". Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.
306. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
307. Paragraph 200 states 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. As the statutory duty imposed by section 66(1) of the Planning

(Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise.

308. When considering the listed building consent application, the duty imposed by section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies and in considering whether to grant listed building consent special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. When considering the planning application, the duty imposed by section 66(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies and in considering whether to grant planning permission special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
309. The overall finding is that there would be a low level of less than substantial harm to a single designated heritage asset (Ibex House). This would occur due to the loss of historic fabric and a slight erosion of the H-plan layout. There are many benefits which would also be delivered by application, and these should be considered as public benefits which should be afforded considerable weight. They are as follows
310. The overall finding is that there would be a low level of less than substantial harm to Ibex House due to the loss of historic fabric and features and a slight erosion of the H-plan layout. Great weight is attached to the significance of this asset of national importance and to the level of harm. Such levels of harm require clear and convincing justification and should only be accepted if there is such justification and that the harm would be outweighed by the public benefits which the proposals would secure.
311. There are many benefits which would also be delivered by application, and these should be considered as public benefits which should be afforded considerable weight. They are as follows:
 - a. The provision of Grade A quality office accommodation supporting the business function of the city – afforded moderate weight
 - b. Provision of a 161sqm (plus storage) cultural learning and exhibition space in a prominent location within the building to provide a public hub supporting 'Destination City' – afforded moderate weight
 - c. Contribution to vibrant City offer to include evening and weekends–afforded minor weight.
 - d. Contribution to jobs and visitor spend in the City – afforded minor weight;
 - e. Inclusive access into the listed building – afforded minor weight
 - f. Public realm enhancements including to remodelling the boundary wall of Portsoken Street Gardens, footway widening works on Haydon

Street and the introduction of a raised table on Portsoken Street Garden – afforded minor weight

- g. An additional publicly accessible café use to Portsoken Street – afforded minor weight.

312. It is the view of Officers that after applying the relevant tests, the public benefits outweigh the low level of less than substantial harm to the significance of Ibex House. The proposals would deliver sensitive repairs, refurbishment works and upgrades to the listed building, lifting the quality of office accommodation from Grade B to Grade A with improved wellbeing, inclusive access, and sustainability credentials This would occur along with the provision of a new accessible cultural and retail space, refurbishment and retention of the public house and public realm improvements. It is considered that the public benefits of the proposals outweigh the low level of less than substantial harm and that there is clear and convincing justification for that harm.
313. An assessment of the significance of designated heritage assets has also been undertaken including of Ibex House including of any indirect impacts on setting and significance of other designated and non-designated heritage assets. In this case, less than substantial harm has been identified to Ibex House (grade II). This assessment is proportional and sufficient for the scope of works for the proposals and complies with NPPF para 194.
314. The low level of less than substantial harm is considered to be significantly outweighed by the benefits. The NPPF heritage policies are an important material consideration, and it is considered that the significant benefits of the scheme would outweigh the low level of less than substantial harm to the designated heritage asset. This conclusion is reached even when giving great weight to heritage significance as required under statutory duties.
315. On the basis of the above, the proposal accords with the heritage policies set out in the NPPF and yet, because of the way the policies are framed, there is a slight conflict with the development plan policies relating to heritage issues. The central aims of the planning system in achieving sustainable development are achieved by these solutions focussed approach on improving thermal performance and by the public benefits to sustaining the building that will flow from the scheme. The fact that the development plan policies do not incorporate the heritage balance should not prevent this development. For that reason, it is considered that in this instance other material considerations indicate that the decision should be made otherwise in accordance with the development plan and that the planning permission and listed building consent should be granted for the scheme notwithstanding the acknowledged harm to the significance of designated heritage assets that will result.

CIL and Planning Obligations

316. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the

City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

317. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City

318. On 1 April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Through MCIL2 The Mayor collects funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

319. CIL contributions and City of London Planning obligations are set out below.

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£232,968	£223,649	£9,319

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£92,550	£87,923	£4,627
City Planning Obligations			
Affordable Housing	£61,700	£61,083	£617
Local, Training, Skills and Job Brokerage	£37,020	£36,650	£370
Carbon Reduction Shortfall (<i>estimated as designed</i>) <i>Not indexed</i>	£45,600	£45,600	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£50,000	£50,000	£0
S106 Monitoring Charge	£3,500	£0	£3,500
Total liability in accordance with the City of London's policies	£290,370	£281,256	£9,114

320. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations (*Highways Schedule of Condition Survey, site access, consents, licences etc*)
- Local Procurement Strategy
- Employment and Skills Plan (*Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (*including Cycling Promotion Plan*)
- Construction Monitoring Cost (£30,935 - for First Year of development and £25,760 for subsequent years)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 Agreement
- Learning Gallery (*Public Access & Management Plan*)
- Cultural Plan
- Public Realm Improvements - Portsoken Street and Haydon Street (*Specifications*)
- Portsoken Street Garden Wall

321. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
322. The scope of the s278 agreement may include but is not limited to reinstatement of existing vehicular crossovers as footway, modification of crossovers, footway widening works (Haydon Street) and potential provision of raised table to provide an at-grade crossing along Portsoken Street.

Monitoring and Administration Costs

323. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
324. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Conclusion

Conclusion for 21/00793/FULMAJ

325. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan (i.e., the London Plan and 2015 Local Plan) and relevant policies and guidance, SPDs and SPGs, relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.
326. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise
327. In this case, the proposals are considered to comply with the majority of policies in the development plan. In particular, those which relate to the provision of high-quality, accessible workplace-led office development in the City, the provision of a cultural contribution, the provision of active retail, an onsite servicing solution, high quality public realm improvements and sustainable development
328. The proposed scheme, along with the already consented upgrade works to levels 1 to 7, would lift the existing building from Grade B into Grade A quality

office floor space. The scheme would deliver high-quality upgrades to the existing office accommodation by providing multiple points of level access to the building, a refurbished central reception area and flexible working space, outdoor amenity areas on the proposed 8th and 9th floor terraces and improved connectivity between the subject building and the adjacent Portsoken Street Garden.

329. The refurbished and extended office accommodation, together with the proposed active ground floor café' area, the ground floor learning/exhibition space and refurbishment works to the corner public house, would support the primary business function and cultural role of the City. The proposals would also contribute to the balance and mix of uses in the immediate vicinity.
330. The proposed 'Learning Gallery' to be provided within a prominent position in the south-western ground floor corner of the building would contribute to diversifying uses and boosting vibrancy within the area, in line with the Corporation's 'Destination City' vision for the Square Mile. The provision of such community and cultural facilities, is supported by the Local Plan.
331. The proposed extensions and alterations have been carefully designed to reflect the architectural language, materials, and original design intent of the existing building. At the same time, the extensions would provide a subtle contemporary interpretation clearly distinct and deferential to the host building.
332. Historic England and the Amenity Societies were consulted. Historic England and the 20th Century Society raised concerns with the original iteration of the proposal in late 2021. Following receipt of amendments to the scheme in October 2022, Historic England have since withdrawn their concerns and do not object to the proposals.
333. The site is located within protected vista corridor (Point 25A.1- To the Tower of London) as set out by the Mayor of London. The protective vista and silhouette would remain unaffected by the proposals, and the extensions sit below the threshold of viewing plane. The distance of the site from the World Heritage Site and the discreet nature of the roof extensions means there would be no impact on this strategically important landmark either in views of or from the World Heritage Site.
334. The building considers sustainability standards, targeting BREEAM 'Excellent' and adopting Circular Economy principles and Whole Life Carbon principles. Dedicated areas of planting and greening would be incorporated through green roofs, greening on terraces and new southern winter gardens, increasing the biodiversity on site.

335. Thirteen public objections have been received across the planning and Listed Building Consent application. These were received during the first round of formal public consultation in December 2021. The second round of formal consultation was carried out following receipt of amendments to the proposal in October and November 2022. No new or amended public comments have been received.
336. Daylight and sunlight loss impacts to surrounding residential properties (including student accommodation) are within BRE guidelines, would be negligible and are acceptable.
337. Other potential off-site amenity impacts associated with construction noise, noise from terraces, overlooking and light pollution would be suitably mitigated through the recommended planning conditions.
338. The scheme benefits from high levels of public transport accessibility, would be car-free (except for blue badge spaces) and would promote cycle and walking as healthy modes of travel. This is particularly evident in the proposal to significantly uplift in on-site cycle parking spaces and facilities proposed to be provided, bringing the site into compliance with London Plan standards.
339. The scheme would improve existing undesirable traffic conditions by providing a dedicate on-site deliveries and servicing area to be accessed from Haydon Street, bringing the site in compliance with the Local Plan, which seeks to ensure servicing is conducted on-site, where possible.
340. Through the scope of Section 278 works, to be secured by the S106 Agreement, the proposal would improve the streets surrounding the development. Namely, the proposed footpath resurfacing and widening works on both Haydon Street and Portsoken St, the provision of a raised table on Portsoken Street and upgrades to the northern wall of Portsoken Street Garden to improve visual connectivity from the street would enhance the surrounds of the site.
341. The delivery of the proposals would result in minor adverse impacts to areas of high and moderate heritage significance. The harm derives from the pavilion extensions and the changes to the public house. There would be some slight erosion of the physical fabric and features through minor demolition and to the architectural form and original plan through the obscuration of parts of the building. For the most part however the overall artistic, architectural and historic values are preserved and in parts are enhanced. Therefore, overall, the proposals would comply with Local Plan Policies CS12, DM 12.1, DM 12.2 and DM 12.3(1), draft City Plan 2036 policies S11 and HE1, and London Plan Policy HC1 (A, B, D and E) however

the proposals would draw conflict with DM 12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).

342. The heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraphs 202 (relating to designated heritage assets) and 203 (relating to non-designated heritage assets). As a result, if a proposal results in any harm to the significance of a heritage asset, even if less than substantial and at the very lower end of the scale, will result in conflict with heritage policies.
343. With regard to designated heritage assets, NPPF paragraph 202 requires that any less than substantial harm be balanced against the public benefits of the development proposal. The paragraph 202 balancing exercise is to be applied when considering the harm to the host building. That balancing exercise is set out earlier in this report.
344. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the special interest setting of the listed host building, the identified harm is outweighed by the public benefits. These public benefits are set out in the public benefits section of this report and include the proposed cultural offer, economic benefits of the office upgrades, publicly accessible café, public realm, and accessibility enhancements.
345. The scheme would provide benefits from CIL for improvements to the public realm, housing and other local measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.
346. Compliance with the development plan is to be considered by reference to the plan as a whole rather than asking whether the proposed development is in accordance with each and every policy in the plan. That approach recognises the fact that individual policies may pull in different directions, and that it would be difficult to find any project of significance that was wholly in accord with every relevant policy in the plan.
347. It is the view of officers that the proposal complies with the development plan when considered as a whole. Accordingly, the presumption in favour of sustainable development in paragraph 11 of the NPPF means that the proposed development should be approved without delay. The other important material considerations that exist in this case reinforce that presumption. Indeed, they are of such significance and should attract

sufficient weight to justify the grant of planning permission even if a different planning judgment was reached as to compliance with the plan overall.

348. Accordingly, Officers recommend planning permission should be granted should be granted subject to the conditions set out the attached schedule.

Conclusion for 21/00794/LBC

349. The proposals have been assessed against Local Plan Policies CS12, DM 12.1, and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. There has also been special regard to the desirability of preserving IbeX House and any surrounding listed buildings including their setting and any features of special architectural or historic interest which it possesses, under s.16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.
350. Overall, the proposal would comply with Local Plan Policies CS 12, DM 12.1 and DM 12.3 (1), draft City Plan 2036 policies S11 and, HE1 (2, 3, 4 and 5) London Plan Policy HC1 (A, B, D and E). It is acknowledged that the proposals are heritage led and well-conceived and detailed. The proposals have also been modified to reduce impacts and to respond to objections. The harm derives from the pavilion extensions and the changes to the public house. There would be some slight erosion of the physical fabric and features through minor demolition and to the architectural form and original plan through the obscuration of parts of the building. For the most part however the overall artistic, architectural and historic values are preserved and in parts are enhanced. The harm is evaluated as a low level of less than substantial, and this is assessed to be at the lowest end of the spectrum. Therefore, elements of the proposals would be contrary to DM 12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).
351. When addressing the balancing exercise, this harm has been afforded considerable importance and weight, and account taken of the importance of the heritage asset as a grade II listed building in accordance with the advice given in paragraph 199 of the NPPF that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
352. It is the view of Officers that giving great weight to the conservation of this heritage asset, and considerable importance and weight to the desirability of preserving the special architectural and historic interest and heritage significance of the listed building, the identified harm to the significance of the designated heritage asset is outweighed by the public interest benefits associated with the proposed development.
353. Accordingly, Officers recommend that Listed Building Consent should be granted subject to conditions as set out in the attached schedule.

APPENDIX A

Background Papers

Application Documents

Cover Letter, Savills, updated 11 October 2022

Design and Access Statement, updated October 2022

Fire Strategy, Hoare Lea, 11 November 2022 (Rev 1)

Ground Movement Assessment, Card Geotechnics Limited, September 2022 (Rev 1)

Heritage Statement, Stephen Levrant Heritage Architecture Ltd, October 2022

Updated Transport Assessment, TTP Consulting, updated October 2022

Updated Deliveries and Servicing Plan, TTP Consulting, updated October 2022

Structural Assessment (External Works – Planning Amendments), PARMAR BROOK, updated October 2022

Updated UGF Calculation Plan, BB UK, Rev B, November 2022

Window Drawings and Schedules, Stephen Levrant Heritage Architecture Ltd, updated October 2022

Correct Area Schedule Addendum to DAS, AHMM Architecture, November 2022

Daylight and Sunlight Assessment, GIA Consulting, August 2021

Daylight and Sunlight Letter for Planning, GIA Consulting, 25 August 2021

Daylight and Sunlight Addendum letter, GIA Consulting, September 2022

Daylight and Sunlight Addendum letter, GIA Consulting, November 2022

Flood Risk & Sustainable Drainage Assessment, PARMAR BROOK, updated September 2022

Travel Plan, TTP Consulting, updated October 2022

Addendum to Statement of Community Involvement, London Communications Agency, October 2022

Statement of Community Involvement, London Communications Agency, 2 September 2021

Streamline Moderne Learning Gallery Statement, AHMM Architects, 7 October 2022

Energy and Sustainability Statement, MTT Sustainable Building Solutions, 10 October 2022

Archaeology Desk-Based Assessment, MOLA, May 2021

Geotechnical and Geo-environmental Interpretative Report, CGL, March 2021

Plant Noise Assessment, Hann Tucker Associates, 2 September 2021

Planning Statement, Savills, September 2021

Air Quality Assessment, Create Consulting Engineers, September 2021

External Consultee Responses

Thames Water, Email, 10 December 2022

Historic England, updated response, 22 November 2022

Historic England, Letter, 18 January 2022

Historic England, Letter of authorisation to determine application, 18 January 2022

20th Century Society, Letter, 7 January 2022

London Underground, email, 9 December 2021

Internal Consultee Responses

Memo, District Surveyor, 30 November 2022

Memo, Lead Local Flood Authority, 7 November 2022

Email, Archaeology Officer, 19 July 2022

Email, Access Officer, 23 November 2022
Memo Air Quality Officer, 9 December 2021

Memo, Department of Markets and Consumer Protection, 8 November 2022

Email, Cleansing Team, 22 November 2022

Email, Transport Planner, 29 October 2022

Comments, Sustainability Officer, 11 November 2022

Public Comments: Objections

Comment – Dr Igor Artsybushev – 16 February 2022

Comment – Dr EJ Smith – 10 February 2022

Comment – Miss Panagiota Markaki – 5 January 2022 (LBC objection)

Comment – Ms Nina Napoletano – 3 January 2022

Comment – Mr Michael Patrick - 21 December 2021

Comment – Mr Neel Mandana – 18 December 2021

Comment – Ms Lydia Hamilton – 18 December 2021

Comment – Miss Julie Webber – 18 December 2021

Comment – Mr Pavlos Vinieratos – 14 December 2021

Comment – Mr Maros Duroe – 12 December 2021

Comment – Mr Mital Patel – 12 December 2021 (LBC objection)

Comment – Mr Magnus Taylor – 12 December 2021

Comment – Mikael Boman – 3 January 2021 (LBC objection)

APPENDIX B

London Plan (2021), Local Plan (2015) and draft City Plan 2036 policies that are most relevant to the consideration of this case are set out below.

London Plan (2021)

Policy GG1 (Building strong and inclusive communities) encourages early and inclusive engagement with stakeholders, including local communities, in the development of proposals, seeking to ensure positive changes to the physical environment and provide access to good quality community spaces, services, amenities and infrastructure. In addition, it supports London continuing to generate a wide range of economic and other opportunities promoting fairness, inclusivity and equality.

Policy GG2 (Making the best use of land) supports the prioritisation of well connected sites for development including intensifying the use of land to support, amongst other things, workspaces, and promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

Policy GG3 (Creating a healthy city) seeks to "ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold" and to "promote more active and healthy lives for all Londoners and enable them to make healthy choices."

Policy GG5 (Growing a good economy) recognises the strategic aim to "promote the strength and potential of the wider city region", including the support and promotion of "sufficient employment and industrial space in the right locations to support economic development and regeneration."

Policy GG6 (Increasing efficiency and resilience) states that planning and development must help London to become a more efficient and resilient city.

Policy SD4 (The Central Activities Zone (CAZ)) states that "the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values"

Policy SD5 (Offices, other strategic functions and residential development in the CAZ) states that "offices and other CAZ strategic functions are to be given greater weight relative to new residential development."

Policy D2 (Infrastructure requirements for sustainable densities) states that the density of development proposals should: 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels; 2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).

Policy D3 (Optimising site capacity through the design-led approach) states that all development must make the best use of land by following a design-led approach, and proposals should consider form and layout, experience, and quality and character.

Policy D4 states that "design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan."

Policy D5 (Inclusive Design) seeks to achieve the highest standard of accessible and inclusive design across new developments.

Policy D8 (Public Realm) establishes criteria for proposals which include public realm space. These criteria include making public realm "well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution."

Policy D11 (Safety, security and resilience to emergency) states that "development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that - in proportion to the risk - deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area."

Policy D12 (Fire Safety) encourages proposals to achieve the highest standards of fire safety and ensure that they: "1) identify suitably positioned unobstructed outside space for fire appliances to be positioned on and which is appropriate for use as an evacuation assembly point; 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire."

Policy D13 (Agent of Change) states that development should be manage noise and other potential nuisances.

Policy D14 (Noise) seeks to avoid significant adverse noise impacts on health and quality of life, and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.

Policy S1 (Developing London's social infrastructure) states that development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies. New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

Policy E1 (Offices) explicitly supports increases in the current office stock, noting that "improvements to the quality, flexibility and adaptability of office space of

different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development."

Policy E2 (Providing suitable business space) states that Boroughs should seek to "support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand." The policy also states that "development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises."

Policy E3 (Affordable workspace) outlines the requirement for affordable workspace. It is noted that leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with submarket rents

Policy E10 (Visitor Infrastructure) states that "London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure.." and that a "sufficient supply and range of serviced accommodation should be maintained". It further states: "Within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), and subject to the impact on office space and other strategic functions. Intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses." The Policy states that serviced accommodation should ensure sufficient choice for people who require an accessible bedroom.

Policy E11 (Skills and Opportunities for all) states that "development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate".

Policy HC1 (Heritage conservation and growth) requires development proposals "should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings."

Policy HC2 (World Heritage Sites) requires that "development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes." The policy also states that "development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact

Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment."

Policy HC3 (Strategic and Local Views) states that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view. Policy HC4 (London View Management Framework) states that "development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."

Policy HC4 (London View Management Framework) states that "Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."

Policy HC5 (Supporting London's culture and creative industries) states that "the continued growth and evolution of London's diverse cultural facilities and creative industries is supported".

Policy HC6 (Supporting the night-time economy) states that planning decisions should "promote the night-time economy, where appropriate, particularly in the Central Activities Zone..." and should promote "management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should be supported".

Policy G1 (Green infrastructure) states that "development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network."

Policy G4 (Open space) identifies that "development proposals should 1) not result in the loss of protected open space; 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency."

Policy G5 (Urban greening) states that "major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage."

Policy G6 (Biodiversity and access to nature) states that "development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This

should be informed by the best available ecological information and addressed from the start of the development process."

Policy G7 (Trees and woodlands) states that the planting of additional trees should generally be included in new developments.

Policy SI1 (Improving air quality) states that "development proposals should not: a) lead to further deterioration of existing poor air quality; b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; c) create unacceptable risk of high levels of exposure to poor air quality."

Policy SI2 (Minimising greenhouse gas emissions) requires that all new major development should be net zero-carbon. Major development proposals should also include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

Policy SI3 (Energy infrastructure) states that "development proposals should: 1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure; 2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter- connecting existing networks as well as establishing new networks."

Policy SI4 (Managing heat risk) identifies that "development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure." The policy also states that "major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems."

Policy SI7 (Reducing waste and supporting the circular economy) identifies that "referable applications should promote circular economy outcomes and aim to be net zero-waste."

Policy SI12 (Flood risk management) requires development proposals to "ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses."

Policy SI13 (Sustainable drainage) states that "development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible."

Policy TI (Strategic approach to transport) highlights that development "should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated." Development that promotes walking through improved public realm is also supported.

Policy T2 (Healthy streets) encourages development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Proposals should "1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance; 2) reduce the dominance of vehicles on London's streets whether stationary or moving; 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

Policy T3 (Transport capacity, connectivity and safeguarding) states that "development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed."

Policy T4 (Assessing and mitigating transport impacts) notes that "where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified."

Policy T5 (Cycling) supports increases in cycling across London through the provision of secure, integrated, convenient and accessible cycle parking facilities as well as associated changing and facilities and showers.

Policy T6 (Car parking) (and T6.2, T6.4, T6.5) sets out parking standards which need to be complied with and that "car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport."

Policy T7 (Deliveries, servicing and construction) states that "development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments."

Relevant Local Plan (2015) Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

DM1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

- a) prejudicing the primary business function of the City;
- b) jeopardising the future assembly and delivery of large office development sites;
- c) removing existing stock for which there is demand in the office market or long term viable need;
- d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.2 Protection of large office sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

- a) assist developers in identifying large sites where large floorplate buildings may be appropriate;
- b) invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- c) ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- d) resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

CS2 Facilitate utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

DM2.1 Infrastructure provision

Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;
- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
- e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS3 Ensure security from crime/terrorism

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

CS4 Seek planning contributions

To manage the impact of development, seeking appropriate developer contributions.

CS10 Promote high quality environment

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved.

Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

To encourage high quality roof gardens and terraces where they do not:

- a) immediately overlook residential premises;
- b) adversely affect rooflines or roof profiles;
- c) result in the loss of historic or locally distinctive roof forms, features or coverings;
- d) impact on identified views.
- e) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

CS11 Encourage art, heritage and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

DM11.1 Visitor, Arts and Cultural

To resist the loss of existing visitor, arts and cultural facilities unless:

- a) replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
- b) they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
- c) it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

DM12.1 Change affecting heritage assets

To sustain and enhance heritage assets, their settings and significance.

Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 Development in conservation areas

Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.

Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

To resist the demolition of listed buildings.

To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Archaeology

To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

DM15.1 Sustainability requirements

Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

- a) BREEAM or Code for Sustainable Homes pre-assessment;
- b) an energy statement in line with London Plan requirements;
- c) demonstration of climate change resilience measures.

BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

For all major development energy assessments must be submitted with the application demonstrating:

- a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
- b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
- c) where on-site carbon emission reduction is unviable, offsetting of residual CO₂ emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
- d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NO_x).

Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

CS16 Improving transport and travel

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

DM16.1 Transport impacts of development

Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

- a) road dangers;
- b) pedestrian environment and movement;
- c) cycling infrastructure provision;
- d) public transport;
- e) the street network.

Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

- a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
- b) the shortest practicable routes between relevant points.

Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.

On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

Coach parking facilities for hotels (use class C1) will not be permitted.

All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

CS17 Minimising and managing waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

DM17.1 Provision for waste

Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

DM18.2 Sustainable drainage systems

The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.

Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.3 Residential environment

The amenity of existing residents within identified residential areas will be protected by:

- a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
- b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

CS22 Maximise community facilities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM22.1 Social and community facilities

To resist the loss of social and community facilities unless:

- a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
- b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
- c) It been demonstrated that there is no demand for another similar use on site.

Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

- a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- b) in locations which are convenient to the communities they serve;
- c) in or near identified residential areas, providing their amenity is safeguarded;
- d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Draft City Plan 2036 Policies

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL5 Location and protection of social and community facilities

HL9 Health Impact Assessments

S2 Safe and Secure City

SA1 Crowded Places

SA2 Dispersal Routes

SA3 Designing in security

S3 Housing

HS3 Residential environment

S4 Offices

OF1 Office development

OF2 Protection of Existing Office Floorspace

S6 Culture, Visitors and the Night -time Economy

CV3 Hotels

CV4 Evening and Night-Time Economy

S7 Smart Infrastructure and Utilities

IN1 Infrastructure provision and connection

IN2 Infrastructure Capacity

IN3 Pipe Subways

S8 Design

DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE4 Pedestrian permeability
DE5 Terraces and Viewing Galleries
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular Transport and Servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
VT3 Vehicle Parking
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HE3 Setting of the Tower of London World Heritage Site
S13 Protected Views
S14 Open spaces and green infrastructure
OS2 City greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk
CR1 Overheating and Urban Heat Island effect
CR2 Flood Risk
CR3 Sustainable drainage systems (SuDS)
CR4 Flood protection and flood defences
S16 Circular economy and waste
CE1 Zero Waste City
CE2 Sustainable Waste Transport
S27 Planning contributions

APPENDIX C

Methodology for daylight (including radiance), sunlight and overshadowing assessment

Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space.

Local Plan Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2022).

Policy DE8: 'Daylight and sunlight' of the Draft City Plan 2036 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.

Local Plan Policy DM21.3 seeks to protect the residential environment including daylight and sunlight.

Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations.

Paragraph 3.10.41 of the Local Plan and Policy HS3 of Draft City Plan 2036 states when considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals.

Within the BRE Guidance, it states that the methods of assessment can be applied to non-domestic buildings where the occupants have a reasonable expectation to light. In this case it is Officers' view that the impact to student residential should be considered.

Methods of Assessment

Daylight to Existing Buildings

The BRE guidelines present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

- 1. Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
- 2. Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

The BRE Guide recommends compliance with both the VSC and daylight distribution (NSL) guidelines.

Sunlight to Existing Buildings

Sunlight to windows: Annual Probable Sunlight Hours (APSH): Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
- Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
- Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21

March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

Overshadowing

Sunlight to open spaces: Sunlight Hours on the Ground (SHOG): The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March. If as a result of the proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

Radiance Assessment

A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). This method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.

Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the Radiance methodology, radiance-based assessments can draw upon the BRE's recommended Average Daylight Factor (ADF) target values, which recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The BRE guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.

Whilst student accommodation is not explicitly discussed within the BRE Guidelines, it is understood that it is common practice is to assign a minimum target of 1% ADF to student rooms (the target for bedrooms), which is considered by officers to be reasonable.

Radiance assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. In addition, the average value of the individual daylight factors within a room can be expressed as a 'radiance based' ADF percentage for the room as a whole.

It should be noted that the Radiance Assessment undertaken is not meant to replace the submitted daylight and sunlight assessments, but to provide a further way to illustrate daylight changes within habitable rooms in the neighbouring properties.

Setting Alternative Target Values (including Mirror Massing)

Appendix F of the BRE guidelines provides advice on setting alternative target values for daylight and sunlight. This notes that the numerical target values are purely advisory and different targets may be used based on the characteristics of the proposed development and/or its location.

Alternative targets may be generated from the scale/layout of existing development within the surrounding context or be based on an extant planning permission. The BRE guide provides an example of a narrow mews in an historic city centre where the VSC values derived from the obstruction angle could be used as a target value for development in that street if new development is to match the existing layout.

The guide notes that a similar approach may be adopted in cases where an existing building has windows that are unusually close to the site boundary and taking more than their fair share of light. In that case, to ensure that new development matches the height and proportions of existing buildings, the VSC and APSH targets for the relevant windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary.

In undertaking assessments, a judgement is made as to the level of impact on affected windows and rooms. Where there is a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment and have become part of an industry standard utilised by Daylight and Sunlight specialists. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which is or is not acceptable.

It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

- Percentage change (10% reduced to 8% = 20% reduction); and
- Actual/Absolute change (10% reduced to 8% = 2% change).

SCHEDULE

APPLICATION: 21/00793/FULMAJ

Ibex House, 42-47 Minories London

Alteration and extension to the existing building at ground and lower ground floor on Haydon Street and Portsoken St with the incorporation of courtyard garden areas, an on-site servicing bay and blue badge parking areas adjacent; Roof level extensions at the 8th and 9th floors; Alterations to the ground floor Minories facade, including level access provision; Alteration and creation of roof terraces and green roofs; replacement / upgrade of balustrades on all elevations; internal reconfiguration of lower levels to incorporate a new mezzanine level, internal cycle storage, and refuse store; creation of a new learning / cultural centre (sui generis) at the ground floor corner of Portsoken Street and Minories;; and retention of existing public house (sui generis) at ground floor / lower ground corner of Haydon Street and Minories including elevational alterations.

CONDITIONS

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
2. There shall be no construction (including demolition) on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts
3. Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the

Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work-Related Road Risk is to be managed. No demolition or construction shall be carried out other than in accordance with the approved details and methods.

REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.

4. Prior to stripping-out or demolition of the existing building or building elements, a material audit of the building or elements to be demolished should be submitted to and approved in writing by the Local Planning Authority to understand the value of the building as a material bank, establishing what can be retained and what can be re-used either on-site, in the first instance, re-used off-site or recycled, demonstrating that as little waste as possible is generated. The development shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plans: London Plan; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction start.
5. Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to: solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not

contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development.

6. Before any works including demolition are begun a survey of the highways and other land at the perimeter of the site shall be carried out and submitted to the Local Planning Authority showing the existing Ordnance Datum levels of the adjoining streets and open spaces.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order to create a record of the conditions prior to changes caused by the development.

7. Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction

8. Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- a) Fully detailed design and layout drawings for the SuDs components of the green roofs;
- b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works;
- c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3

9. 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 development pursuant to this permission shall be carried out in accordance with the approved details:
 - a) Samples and colour finishes of all the external materials including a mock up panel of the black faience and crittall glazing.
 - b) Construction details of all external elements of the pavilion extensions and lightwells at scale 1:20, 1:10, 1:15 as appropriate.
 - c) Details of the junction of the new pavilions with existing fabric;
 - d) Details of balustrades;
 - e) Construction details of all external elements of the roof extensions at 1:20, 1:10 and 1:15 as appropriate.
 - f) Construction details of the external sui generis use elevations at 1:20; 1:10; 1:5 as appropriate.
 - g) Construction details of the external public house elevation at :20; 1:10; 1:5 as appropriate.
 - h) Construction details of the new external entrance doors to IbeX House on Minorities and level access provision at scale 1:10 and 1:5 as appropriate.
 - i) Detailed design of the roof terraces including hard and soft landscaping;
 - j) Details of external cleaning proposals;
 - k) Details of new service doors;
 - l) Details of the plant enclosure and fifth elevation of the plant;
 - m) Details of the upper ground floor accessible WC and shower layouts.
 - n) Details of the re-use of cladding materials and railings.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.2, DM10.3, DM10.4, DM10.8, DM12.1, DM12.3, DM17.1, DM19.2

10. Prior to the commencement of the relevant works, a final Lighting Strategy and Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:
 - a) lighting layout/s;
 - b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
 - c) a lighting control methodology;
 - d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential

amenity including light pollution, light spill, and potential harm to local ecologies;

- e) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass;
- f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.

All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, sustainability and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.1 15.7 , CS15 and emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036."

- 11. All unbuilt surfaces, including terraces/balconies and public realm, shall be treated in accordance with a landscaping scheme, including details of:
 - a) the position, size and types of planting of green roofs, and method of irrigation;
 - b) details of the final Urban Greening Factor of the scheme;
 - c) Irrigation, including provision for harvesting rainwater run-off from surfaces to supplement irrigation;
 - d) Details of all soft landscaping including species and contribution to enhance biodiversity;
 - e) Maintenance plans for all proposed landscaping;
 - f) Details of hard landscaping including seating and planters;
 - g) Vertical greening including species, supporting structure, method of fixing, growing medium and method of irrigation.
 - h) Contribution to biodiversity enhancement of all landscaping including greening, green walls and green roofs.

to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

12. No servicing of the approved development by motorised vehicles shall occur during the hours of 0700 - 1000, 1200 - 1400 and 1600 – 1900 on weekdays, except for a total of two deliveries to service the café use and pub use between 0700 and 0800.
REASON: To ensure that the development does not have an adverse impact on the free flow of traffic or highway safety in the surrounding streets in accordance with the following policy of the Local Plan: DM16.1.
13. No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
14. Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 333 no. long stay pedal cycles and 43 no. short stay pedal cycles. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking. A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
15. Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
16. No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
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.
17. No live or recorded music that can be heard outside the premises shall be played.

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.

18. The roof terraces on levels 8, 9 and rooftop hereby permitted shall not be used or accessed between the hours of 21:00 on one day and 07:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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.

19. (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

20. The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

21. Before any works thereby affected are begun, a scheme shall be submitted and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the public house and cafe use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external

appearance of the building will require a separate planning permission. The details approved must be implemented before the public house and cafe use take place, unless no new primary cooking facilities are proposed.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

22. Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

23. All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

24. Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.

REASON: In order to ensure that the generator does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan policy SI 1.

25. The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.

REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

26. No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological

work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

27. No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

28. All new work and work in making good shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile, unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this permission.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1

29. The development shall provide: 22,689 sq.m (GIA) of office floorspace (Class E), 563sq.m (GIA) Pub floorspace (sui generis), 124 sq.m (GIA) cafe floor space (Class E) and 161 sq.m (GIA) of cultural learning/exhibition floorspace (Sui Generis).

REASON: To ensure the development is carried out in accordance with the approved plans.

30. The floorspace within the development marked as cafe within the southern ground level extension on the floor plans hereby approved, shall be used for retail (Class E(a)) and/or cafe/restaurant (Class E(b)) and for no other purpose (including any other purpose within Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that active public uses are retained to ground floor.

31. The floorspace within the development marked as Learning Gallery (sui generis) floorspace on the floor plans at upper ground floor level hereby approved, shall be used as a Learning and exhibition space with ancillary facilities (sui generis) and for no other purpose (including any other purpose within the Schedule to the Town and Country Planning (Use Classes) Order

1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure compliance with policy S6 of the Draft City Plan 2036.

32. A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent') shall be submitted as soon as practicable after practical completion. The post construction assessment should include the credits achieved to demonstrate sustainability across the range of categories.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2, and emerging policy DE1 of the Draft City Plan 2036.

33. No later than 3 months after completion of the building and prior to the development being occupied, a post-completion Circular Economy Statement shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the Publication London Plan.

34. Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should include the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion.

REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the Publication London Plan.

35. No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling

must be undertaken in accordance with the terms of the approved piling method statement."

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

36. Prior to occupation an Accessibility Management Plan shall be submitted to and approved by the Local Planning Authority. This should include accessibility details for the publicly accessible spaces. The building shall only be operated in accordance with the approved management plan. REASON: To ensure the scheme provides a fully accessible and inclusive facility in accordance with Policy DM10.8.

37. Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

38. 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:
 - 18082_ZZ_ZZ_DR_A_PL001 P02
 - 18082_ZZ_ZZ_DR_A_PL080 P02
 - 18082_ZZ_LGF_DR_A_PL01L P02
 - 18082_ZZ_M1_DR_A_PL01M P02
 - 18082_ZZ_UGF_DR_A_PL010 P02
 - 18082_ZZ_01_DR_A_PL011 P02
 - 18082_ZZ_02_DR_A_PL012 P02
 - 18082_ZZ_03_DR_A_PL013 P02
 - 18082_ZZ_04_DR_A_P02
 - 18082_ZZ_05_DR_A_P02
 - 18082_ZZ_06_DR_A_PL016 P02
 - 18082_ZZ_07_DR_A_PL017 P02
 - 18082_ZZ_08_DR_A_PL018 P03 1
 - 18082_ZZ_09_DR_A_PL019 P03
 - 18082_ZZ_10_DR_A_PL010 P03
 - 18082_ZZ_ZZ_DR_A_PL021 P02
 - 18082_ZZ_ZZ_DR_A_PL022 P02
 - 18082_ZZ_ZZ_DR_A_PL023 P02
 - 18082_ZZ_ZZ_DR_A_PL024 P02
 - 18082_ZZ_ZZ_DR_A_PL030 P02
 - 18082_ZZ_ZZ_DR_A_PL031 P02

18082_ZZ_ZZ_DR_A_PL032 P02
18082_ZZ_ZZ_DR_A_PL034 P02
18082_ZZ_LGF_DR_A_PL10L P02
18082_ZZ_M1_DR_A_PL10M P02
18082_ZZ_UGF_DR_A_PL100 P02
18082_ZZ_01_DR_A_PL101 P02
18082_ZZ_02_DR_A_PL102 P02
18082_ZZ_03_DR_A_PL103 P02
18082_ZZ_04_DR_A_PL104 P02
18082_ZZ_05_DR_A_PL105 P02
18082_ZZ_05_DR_A_PL106 P02
18082_ZZ_07_DR_A_PL107 P02
18082_ZZ_08_DR_A_PL108 P02
18082_ZZ_09_DR_A_PL109 P02
18082_ZZ_10_DR_A_PL110 P02
18082_ZZ_ZZ_DR_A_PL201 P02
18082_ZZ_ZZ_DR_A_PL202 P02
18082_ZZ_ZZ_DR_A_PL203 P03
18082_ZZ_ZZ_DR_A_PL204 P02
18082_ZZ_ZZ_DR_A_PL300 P02
18082_ZZ_ZZ_DR_A_PL301 P03
18082_ZZ_ZZ_DR_A_PL302 P02
18082_ZZ_ZZ_DR_A_PL304 P02
00098-REV P04
18082_ZZ_UGF_DR_A_PL100_GL
18082_ZZ_M1_DR_A_PL10M_GL
UGF Plan Rev B

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

1. In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

2. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7C98843b95b0374eff381408d9bbcff7a6%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637747324148616972%7CUnknown%7CTWFPbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQljoiv2luMzliLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C3000&sdata=XEMOHsDd3%2Fu1S5rDI5w4gclid5R93HJTdi2JhkCpKbg%3D&reserved=0> . Please refer to the Wholesale; Business customers; Groundwater discharges section.

3. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-ourpipes&data=04%7C01%7C%7C98843b95b0374eff381408d9bbcff7a6%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637747324148616972%7CUnknown%7CTWFPbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQljoiv2luMzliLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C3000&sdata=ppcEWXHoffMmR9c3hbDIE641riB2vznnGdUQ7q2hFk%3D&reserved=0). There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-ourpipes&data=04%7C01%7C%7C98843b95b0374eff381408d9bbcff7a6%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637747324148616972%7CUnknown%7CTWFPbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQljoiv2luMzliLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C3000&sdata=ppcEWXHoffMmR9c3hbDIE641riB2vznnGdUQ7q2hFk%3D&reserved=0>.

4. The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would

suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

5. During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.
 - to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;
 - aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;
 - or where the procurement of goods and services is contracted out
 - ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our 'Guidance note for developers').

For additional details please refer to the City of London's 'Local Procurement Charter' and 'Local Procurement - Guidance Note for City Developers'. These documents can be found at http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning. Further guidance can be obtained by contacting the 'City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.

To access free support in procuring locally please call 020 7332 1532 or email city.procurement@cityoflondon.gov.uk

6. The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office 185GBP per sq.m

Retail 165GBP per sq.m

Hotel 140GBP per sq.m

All other uses 80GBP per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

7. Where groundworks not shown on the approved drawings are to take place below the level of the existing structure (including works for underpinning, new lift pits, foundations, lowering of floor levels, new or replacement drainage, provision of services or similar) prior notification should be given in writing to the Environment Department in order to determine whether further consents are required and if the proposed works have archaeological implications.
8. This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
9. Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
10. Access for disabled people is a material consideration in the determination of planning applications. The City of London's Access Advisor has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and Draft City Plan 2036 Policy HL1. The Access Advisor promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that

a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.

11. Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:

- (a) Works affecting sites containing Scheduled Monuments or where Scheduled Monument Consent may be required:

The Inspector of Ancient Monuments for London
English Heritage
London Region
1 Waterhouse Square
138-142 Holborn
London
EC1N 2ST

- (b) Fire precautions and certification:
London Fire Brigade, Fire Prevention Branch
5-6 City Forum
City Road
London EC1N 2NY

- (c) Public houses, wine bars, etc.

City of London Corporation
Trading Standards and Veterinary Service
PO Box 270
Guildhall
London EC2P 2EJ

- (d) Betting offices and gaming licences:

Clerk to the Betting and Gaming Licensing Committee
The Justice Rooms
1 Queen Victoria Street
London EC4N 4XY

- (e) Employment agencies:

Employment Agencies Licensing Office
Department of Employment
Exchange House
60 Exchange Road
Watford, Herts WD1 7HH

(f) Inflammable materials (e.g., petroleum)

London Fire Brigade, Petroleum Department
5-6 City Forum
City Road
London EC1N 2NY

(g) Works affecting Transport for London operational land and structures:

Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

(h) Works affecting a GLA road:

Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

(i) Works within 10 metres of the Docklands Light Railway tunnels or other structures:

Docklands Light Railway Ltd
P.O. Box 154
Castor Lane
Poplar
London E14 9QA

(j) Works in proximity to the line of the CrossRail project:

Cross London Rail Links Limited
Portland House
Bressenden Place
London, SW1E 5BH

(k) Works affecting railway operational land and structures:

Planning Surveyor
Railtrack
355 Euston Road
London NW1 3AG

(l) Works affecting the River Thames:

Planning Manager
Port of London Authority
Devon House
58-60 St. Katharine's Way
London E1 9LB

(m) Works affecting water supplies, land drainage and flood defences:

Environment Agency,
North London Planning Liaison Team
9th floor, Eastbury House
30-34 Albert Embankment
London, SE1 7TL

12. AHMM should be retained for the detailed construction stage of the project

13. This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Dr Igor Artsybushev

Address: Osteopathy Practice, Ground Floor Ibex House, Portsoken St Entrance London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I run the osteopathy clinic in the consulting rooms on the Portsoken St side of Ibex House. I sympathise with local residents' concerns about noise, and can attest to the prolonged disturbance from construction work that has already been going on in our area for a very long time. I note with surprise the commitment to community consultation and involvement in the Ibex House refurbishment project. At no stage has anyone consulted me, and I have only recently seen the new plans for the building. As far as I can understand the remake of the Portsoken St entrance does not include provision for my practice. I have been given notice to leave, thus finally shutting down a clinic where I have worked for more than 25 years, and which has operated on this site serving local residents, office workers in the building and City workers since Ibex House opened in 1938. Such a lack of respect and consideration both for me, and for the history of our part of the City is profoundly depressing. It also makes me doubt very much that the landlords will care any more about the concerns of local residents, or the heritage and historical integrity of this rare and very beautiful Art Deco building.

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Dr EJ Smith

Address: Flat 12 Prospero House 6 Portsoken Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: This proposal will be devastating for the residents of Prospero House. The noise pollution alone from building work is likely to cause extreme disruption and disturbance over a prolonged period of time. It will personally be catastrophic for me as a key worker working hospital night shifts and trying to sleep in the day. Small children and pets living here will also be particularly adversely affected, as will the rental yield of those flats which are rented out. Once this work is completed, what little light the flats of the building receive (most of them having only north-facing windows, i.e. facing Ibex House) is likely to be almost completely obliterated. This will have an impact on our energy bills (already about to skyrocket), as well as being psychologically damaging. I oppose these proposals in the strongest of terms.

From: [REDACTED]
To: [PLN - Comments](#); [PLN - Comments](#)
Subject: Application Reference: 21/00794/LBC - Ibex House 42 - 47 Minories London EC3N 1DY- FAO: Gideon Stothard
Date: 03 January 2022 13:27:38

THIS IS AN EXTERNAL EMAIL

Application Reference: 21/00794/LBC - Ibex House 42 - 47 Minories London EC3N 1DY-
FAO: Gideon Stothard

Your Title: Mrs

Your First Name: Panagiota

Your Surname: Markaki

Address: 603 Marlyn Lodge, Portsoken Street

Town/City: London

Postcode: E1 8RB

Your Email Address:

Commenter Type: Neighbour

Stance: Object

Reason for comment:

- Noise

-Other

- Residential Amenity

I object to all roof alterations (especially those proposed for the East side of the top floors of the IBEX, facing Marlyn Lodge) as these are currently described in the applicants' documents, for the following reasons:

1). Unacceptable loss of sunlight.

The applicants' "Daylight & Sunlight report" states on p.4 that loss of sunlight to Marlyn Lodge residents caused by the top floor roof extensions is "not an unacceptable reduction". This fails to take into account that any further loss of sunlight should be counted in addition (and cumulatively) to the loss of sunlight already suffered by Marlyn Lodge flats, and caused by all the other high rise buildings recently erected on the Minories, including

Hotel Motel One, the new residencies forming part of the Canopy by Hilton London City Hotel, and the Urbanest University residences building at 52-56 Minories, all of which are very high buildings restricting our sunlight. Sunlight has been drastically reduced for us by all of these developments created in the space of the last 10 years. This should be taken into account by the City of London's Environment Department when considering any building applications affecting our sunlight in the future. In effect, Marlyn Lodge flats facing towards the Minories are already literally "boxed in".

2). Invasion of privacy/noise (and potential light) pollution.

The terrace "amenity" spaces (incorporating sitting areas for office workers) and the roof extensions/top pavillions as currently shown in the applicants' documents will constitute a gross invasion of Marlyn Lodge residents' privacy and will be a potential source of noise pollution and - should any LED or other lighting be installed above any sitting areas - a source of light pollution as well. The windows of all bedrooms and living rooms of the Marlyn Lodge flats facing the East side of the IBEX building will be looked upon by the proposed new roof top extensions to the 8th, 9th and 10th floors. Such alterations would effectively be depriving us of sunlight while at the same time potentially afflicting us with artificial lighting during any and all hours of darkness. The proposed creation of sitting areas (such as the tables seen in the applicants' designs) on the new roof terraces would be an unacceptable invasion of our privacy. The applicants' proposition that green roof terraces with outdoor sitting areas for the use of office workers are good for the environment and benefit the wellbeing of IBEX employees might be true in principle but is very one sided. Any potential benefits of said roof top green sitting areas to office workers' wellbeing could never override or countermand the adverse effects such alterations to the IBEX would inflict on the mental health and wellbeing of the permanent residents of Marlyn Lodge, who would stand to lose their peace, quiet and privacy by being looked on by people using the terraces of the IBEX building. It should be taken into account that, unlike the employees occupying the IBEX building, the residents of Marlyn Lodge will not have another place of residence to return to after office hours. It should also be taken into account that many Marlyn Lodge residents are being asked to work from home once again, meaning their flats are not only their home space but their work space as well. The existing terraces of the IBEX are currently never used as sitting areas for office workers and are only used for building maintenance work.

I would also object to the applicants' proposed plans for Portsoken street i.e. the removal of car parking spaces and their replacement with "extended pavement to incorporate landscaping, seating etc." and to the applicants' proposition to switch all deliveries to the IBEX from Haydon street to Portsoken street. Portsoken street is already a very busy street traffic-wise, especially when Mansell street is busy. It is only one lane, which in addition to car traffic is used by cyclists in both directions. It is used for deliveries to the 90 Mansell street Tesco, the 48 Minories Starbucks and the 1 Portsoken street Lloyds Chambers building, deliveries which already often cause congestion to it. All current parking spaces on the street are essential to the businesses, residents and office workers on the street and their removal would not make any sense at all.

Please acknowledge receipt of this comment.

Kind regards,
Panagiota Markaki

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Ms Nina Napoletano

Address: 508 marlyn lodge London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: We as residents living in Marlyn Lodge have put up with construction on Portsoken Street for over two years. The building opposite Ibex House just finished construction and is still sitting empty almost a whole year later.

Right now the reconstruction of Ibex House is not important. I live directly across from the building on the 5th floor. This is the view I see every morning. I work night shift in the NHS and since dealing with Covid 19 these past two years and the construction on the building directly across from Ibex House I stand firmly on voting NO. The constant noise of construction is unbearable. Take on top of everyday living noise living in a city with cars, alarms, people on the street and so on.

I find this remodelling on Ibex House unnecessary and not important at the moment. The residents of Marlyn Lodge have dealt with enough noise these past few years.

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Mr michael patrick

Address: 2 Portsken Street, City of London Marlyn House Unit 506 london

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The planning proposal aside from the technical issues concisely outlined by other objectors is commercially flawed from the get go.

The impacts of Covid in the last 2 years and for the years to come has seen a seismic shift in the work life of all white collar workers with Work From Home not just being a Government direction at times but is now the new normal be it full time or hybrid.

Companies with a clear vision of this new norm are already downsizing their commercial space in London with one leading accounting firm decreasing commercial space by over 40% at a multi million GBP saving per year with NO impact on productivity

Every commercial building in the immediate vicinity is either long term vacant or operating with a heavily reduced on site work force which is validated sadly by the amount of small businesses such as cafe's, bar's, resto's etc. closed down or operating reduced days/hours per week as the white collar worker population has decreased significantly and the trend is not short term trend but is the new norm.

The area is like a ghost town on the weekends and now with work from home the new norm, this will extend to week days as well

The thought of adding additional commercial office space in this area is a flawed investment by the owners/shareholders of the building and the commercial justification cannot stand the test of time as a worthy investment let alone the impact on the residents in the immediate and surround area of IBEX House.

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Mr Neel Mandana

Address: 32 Admirals Court 30 Horselydown Lane London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity
- Traffic or Highways

Comment: There is no parking space in E1 8BZ for parking. When we need general maintenance services, it proves to be difficult because we don't have parking space

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Ms Lydia Hamilton-Rimmer

Address: 6 portsoken street Flat 6 Prospero House London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: The proposals will significantly reduce the natural light for all flats in Prospero house.

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Miss Jule Weber

Address: Flat 10, Prospero House 6 Portsoken Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I am living in a flat right opposite. Not only would my flat become uninhabitable for the duration of outside construction, but it would also significantly reduce the availability of light in my flat over the long run.

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Mr Pavlos Vinieratos

Address: Flat 1, Prospero House, 6 Portsoken Street, London E1 8BZ

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I fully agree with Mr Marcos Duroe.

The 8th and 9th floor extensions seem like something that will block light, make noise, and only be a detriment to the neighbourhood.

The rest of the requests seem fine. They could and should be done without them being "bundled" with the floor extensions.

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Mr Marcos Duroe

Address: Apt 15/Penthouse 6 Portsoken Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment:For the consideration of the committee:

I'm sorry, but to even call this a minor extension is deliberately manipulative and misleading language to the committee. Currently at the two top levels there exists two service shafts, approximately 10 metres square each at each end of the long elevation of the building. To "extend" these would mean a 150 metre infill between these two, effectively creating 2 floor across the whole roofline of the building. This would have considerable impact on all 14 apartments here at Prospero House. It will create two floors that will look into my bedrooms and more light pollution as the floors opposite currently leave lights on all night and in 20 years, I haven't made them able to stop.

I know and respect the committee has to give in to commercial pressures and commercial rates are probably much more lucrative to the city's coffers than the moans of those pesky residents, but please can you just look at it this way. This building is 25 feet from our only windows. Imagine there's a building 25 feet from where you all live. That leaves its lights on all night. This means you have to leave your bedroom curtains closed all day, and now they want to add two floors to block out what remaining light you do get. Please just see this from our side.

I've lived here 20 years. All decisions have gone against residents. Urbanest built a building 3 stories higher than us blocking all light to the south and giving me a window that looks directly into my bedroom, so I have to keep my only south facing window covered all day. They now built 650 bedroom unit that impacts us to the north-west, but wasn't deemed in the necessary distance so we weren't informed and now another building will hem us in further. Please - you have to make a decision to incorporate the impact on residents at least in this instance

As I compromise, I have no issue with the rest of the proposal. Not excited about the new entrance but that won't stop me sleeping at night

Comments for Planning Application 21/00794/LBC

Application Summary

Application Number: 21/00794/LBC

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street, to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors; (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Mr Mital Patel

Address: Flat 12 Prospero House 6 Portsoken Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment: I object to any and all work that results in a h expansion of the upper floors. The current '8th and 9th' floor is a small lift shaft. The expansion adds 2 floors across a large footprint of the building. Currently I can see the sky above the building if I stand at my window. If the expansion is completed I will not be able to see it anymore, and anyone using those floors will be able to see into my living room and bedroom impacting my privacy.

Also there is no need for the extra floors. There is already plenty of vacant office space nearby including the recently completed 1 Portsoken that is yet to be occupied.

As for the winter garden areas, I am concerned that this will bring further noise to an area that is already plagued by noise from other venues opening late.

The works themselves will result in significant disruption on Portsoken Street and Minories, as well as unacceptable levels of construction noise in a world where we are increasingly being asked to work from home for longer periods.

I would be far more supportive of an application to convert the building to residential use.

Comments for Planning Application 21/00793/FULMAJ

Application Summary

Application Number: 21/00793/FULMAJ

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street (1016sq.m GEA), to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors (645sq.m GEA); (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Mr Magnus Taylor

Address: Flat 11, Prospero House, Portsoken Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: After a thorough consideration of the extension proposal, I have decided to vote to object to this development plan. As a neighbouring resident, I consider this proposal to be detrimental on the following grounds:

- I) The construction works will be very noisy (particularly for residents who are now required to WFH);
- II) Through raising the height by 2 floors compared to what we see today, this will block out a lot of the view current residents enjoy;
- III) As an extension to point II, given the prospect of another lockdown, this will exacerbate the anxieties of many residents who rely on such a view for their mental health and general wellbeing.

Thank you for considering my stance on this matter.

Comments for Planning Application 21/00794/LBC

Application Summary

Application Number: 21/00794/LBC

Address: Ibex House 42 - 47 Minories London EC3N 1DY

Proposal: (i) Extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street, to incorporate external 'winter gardens' at lower ground floor; (ii) extension at 8th and 9th floors; (iii) alteration to the ground floor Minories facades; (iv) creation of external roof terraces; (v) replacement of external balustrades on all elevations; and (vi) internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store.

Case Officer: Gideon Stothard

Customer Details

Name: Mr Mikael Boman

Address: 604 Marlyn Lodge Portsoken Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: The proposed relocation of all deliveries to Portsoken Street would adversely affect the amenity of the residents of Portsoken Street (in particular noise and air pollution). The street already suffers from severe traffic congestion. This is the case even with the 230,000 square feet office building at 1 Portsoken Street (Lloyds Chambers) currently being unoccupied. Once that building (which receives all its deliveries from Portsoken Street) is occupied, the traffic congestion on Portsoken Street will increase further. Furthermore, one traffic lane on Mansell Street is due to be converted to bicycle lanes later this year, which is likely to exacerbate the traffic congestion problem in Mansell Street as well as Portsoken Street.

The proposal to ensure that any deliveries to the Ibex building will take place outside peak hours will run the risk of creating undue noise disturbance during late evenings/early mornings to the nearby residents.

Furthermore, the proposed removal of the six on-street parking opportunities is also likely to cause issues for deliveries and other visitors to the other residential and office buildings on Portsoken Street and in turn exacerbate the traffic congestion problem.

The extension of the existing office floor space at the east elevation of the building will result in

unacceptable level of loss of daylight for the nearby residents.

The proposal to make the current terraces accessible to the tenants (and their staff) and build new terraces to be used by the tenants (and their staff) will adversely impact the residential amenity of the nearby residents since it is likely to result in increased noise disturbance and loss of privacy (with the terraces immediately overlooking the nearby residential premises).

Sent by email: PLNComments@cityoflondon.gov.uk

07 January 2022

Dear Gideon Stothard

21/00794/LBC - IBEX HOUSE, MINORIES, LONDON, EC3N 1DY

The Twentieth Century Society has been notified of the above application for Listed Building Consent for the extension and alteration of Ibex House, which is Grade II listed. In full, the application is for the

- i. extension of the building at ground and lower ground floor on Haydon Street and Portsoken Street, to incorporate external 'winter gardens' at lower ground floor
- ii. extension at 8th and 9th floors
- iii. alteration to the ground floor Minories facades
- iv. creation of external roof terraces
- v. replacement of external balustrades on all elevations
- vi. and internal reconfiguration of lower levels to incorporate new mezzanine level, internal cycle store, and refuse store

The Society has heritage concerns about some of the proposals and we therefore **object** to the application.

Background

Ibex House was built in 1935-37 to designs by Fuller, Hall & Foulsham, a prolific commercial practice in the 1930s. It was the first building in the City of London constructed of flat slab concrete construction, after the London County Council relaxed its legislation. It is still more significant in being a streamlined Moderne building in the heart of the City, otherwise known for its traditional architecture. A Building Design article (19 September 1975) described it as "probably the best example of its type in central London". Ibex House claimed the longest strips of windows in Britain when constructed, their horizontal bands contrasting with biscuit cream faience tiles. Glazed stairs provide vertical emphasis and suggest the influence of Erich Mendelsohn's series of Schocken stores built in Germany in the late 1920s. Vertical components and the lower level are articulated with black faience.

Policy

Due to its great national historic and architectural significance, Ibex House is designated Grade II and great weight should be given to its conservation. The National Planning Policy Framework (NPPF) defines 'conservation' as 'the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance'.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Listed Buildings Act) states that "In considering whether to grant planning permission for



development which affects a Listed Building or its setting, the local planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation" (para 199) and that "Any harm to, or loss of, the significance of a designated heritage asset [...] should require clear and convincing justification" (para 200).

Comments

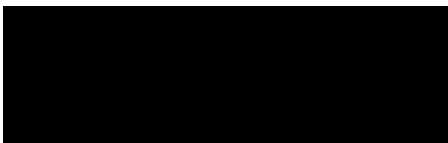
The Twentieth Century Society has concerns about the application on heritage grounds.

Of primary concern to the Society is the proposed addition of the new entrance pavilion extensions to Haydon St and Portsoken St containing new workspaces. While we appreciate the desire to open up the building to the street and support efforts to improve access, we are of the opinion that the proposed approach is not appropriate for a designated heritage asset. The proposal will see a significant amount of the north and south elevations demolished at the upper ground level (in addition to the lower ground and mezzanine levels, and the removal of the floor slab here) and will result in the loss of the entrances. The building's original H-plan footprint will be lost, as will the original 'carriage ways' and boundary treatment. While aspects of these lower elevations have been altered (mainly the windows) they retain their original 1930s character which we feel ought to be better conserved. We take the view that the pavilion proposal needs to be reconsidered and access improved by other means more sensitive to the fabric and character of the listed building.

We appreciate that the proposed extension to the upper levels are modest and have been set back from the elevations. That said, we ask if the access to the 9th floor extension could be reconfigured to remove the need for the round stair projection to the north elevation, which is visible from Haydon Street and lessens the impact of the glazed stair, a significant feature of the building (we refer to p.126 of the Design & Access Statement).

We consider that the issues outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 199 and 200 of the NPPF. The Society would welcome the opportunity for a site visit before a decision is made on the application, and we would be happy to be re-consulted on the proposals if amended.

Yours sincerely,



Coco Whittaker

Caseworker

Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

The Twentieth Century Society
70 Cowcross Street, London EC1M 6EJ





Mr Gideon Stothard

Direct Dial: [REDACTED]

CORPORATION OF LONDON

LONDON

Our ref: L01448419

EC2P 2EJ

18 January 2022

Dear Mr Stothard

Arrangements for Handling Heritage Applications Direction 2021

**IBEX HOUSE, 42 - 47 MINORIES , LONDON EC3N 1DY
Application No. 21/00794/LBC**

Thank you for your letter of 6 December 2021 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your Authority in determining the application.

Summary

Historic England has serious concerns about the proposed extension and their impact on the significance of Ibex House. We therefore recommend that amendments to the scheme are sought.

Historic England Advice

Significance

The application property is a 1930s Grade II listed office building located in a commercial area to the north of the Tower of London.

The building was designed by Fuller, Hall and Foulsham in a distinctive art deco moderne style incorporating strong horizontal bands of faience tiles and windows, streamlined curves and strong vertical accents.

The building has three street elevations. The principal elevation faces onto Minories, which is a wide commercial street, making it a natural choice for retail frontages and central office entrance topped by a fairly restrained façade treatment. In contrast, the



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

[REDACTED]
HistoricEngland.org.uk



north and south elevations address the much longer, quieter and narrower Haydon and Portsoken Streets. These substantial elevations clearly provided Fuller, Hall and Foulsham with an opportunity to explore the moderne style further. The north and south elevations are designed in a similar manner and are highly modelled, stepping back from the pavement line to the central section in order to allow maximum light levels to enter the building. The central axis of both elevations is marked by highly-distinctive circular glazed towers that project from the facades and appear to stand proud of the building where they step back at the upper levels and create a strong vertical emphasis at this point. At the lower levels, the towers are terminated with stylised canopied entrance structures and steps. Also of note are the original walls and railings to the street frontages, where the building is set back behind paved forecourts. The resulting architectural compositions provide a great deal of visual interest in views looking east and west along Haydon and Portsoken Street and from the south across the Portsoken Street gardens.

Whilst some alterations have taken place over the years, such as the replacement of the windows and shopfronts, the external architectural composition of the building remains largely complete and unaltered.

Impact

The proposals are to refurbish and extend the building for continued office use with retail accommodation fronting onto Minories. We seek to comment on the following proposals:

Main internal staircase and entrance lobby

From the application submission, it is not clear whether the proposed works will affect any significant features associated with the main staircase and entrance lobby. Further information is therefore necessary in order to assess the impact of the proposals on the architectural significance of those areas of the building.

Extensions at lower levels on the north and south elevations

The proposals appear to involve the loss of significant areas of original fabric that serve to play an important role in the architectural composition of the north and south facades, including the original canopied entrance structures and steps, parts of the original facades at the lower levels of the building, as well as the walls and railings to the street frontages. As such, the proposals are considered to have a harmful impact on the architectural significance of the building.

The proposed extensions have been designed in manner that somewhat reflects the moderne style of the building. However, in our view, they are likely to have a harmful impact on the architectural significance and composition of the building through the introduction of large and intrusive new elements that are likely to dominate views of the building and partly obscure significant elements of the original architectural composition..



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


HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

Roof extension

The proposals include an additional storey at roof level that would be glazed in a similar manner to the elevations below, but also includes a glazed projections over the north and south glazed towers. In terms of impact, it is possible that this additional storey may be visible within the treeline to the left of the White Tower of the Tower of London in views from the Southbank. As such, the proposals may impact on the setting of the tower.

In relation to the significance of Ibex House, the main part of the proposed roof extension appears to sit comfortably against the architectural composition of the listed building. However, the projections over the north and south glazed towers appear to challenge the independence and strong vertical emphasis of the existing glazed towers by introducing a new element at roof level. In our view, this element of the roof extension creates a degree of harm to the architectural significance of the building.

Policy

The Government's planning policies are set out in the National Planning Policy Framework (NPPF) 2021. The overarching presumption in the NPPF is for sustainable development which responds to economic, social and environmental objectives.

The Government's policies in respect of the historic environment are set out in Part 16 of the NPPF. Central to these policies is a presumption in favour of the conservation of heritage assets proportionate to their significance, which can be derived in part from their setting. Paragraph 197 states that local planning authorities should 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 positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 200 states 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 states 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.

The London Plan 2021 Policy HC4 refers to the London View Management Framework 2012 (LVMF) and states that development proposals in the background of a view should give context to landmarks and should not harm the composition of the view as a whole. Views 25A of the LVMF seek to protect a series of Townscape Views



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


HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

looking from the Southbank towards the Tower of London World Heritage Site.

Position

We would recommend that further information is provided in relation to the above proposals in order to gauge their impact on the historic environment:

Main internal staircase and entrance lobby

Further information on the significance of the built fabric in this area and how it is likely to be affected by the application proposals.

Roof extension

A larger scale image of proposed LVMF view 25.A1 with a clear indication of the position of the roofline of the proposed extension.

We have serious concerns about proposed extensions at the lower levels on the north and south elevations of the building and the projection of the roof extension over the glazed towers. We would therefore recommend that revisions are secured in order to mitigate the harm identified above. We would be happy to participate in discussions regarding possible revisions to the scheme.

If your authority is minded to approve this application, we draw your attention to policy 202 of the NPPF and the requirement to weigh the proposed harm against the public benefits of the proposal.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 200 and 202 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

We would urge your Authority to address the advice set out in this letter, and determine the application in accordance with national and local planning policy and in consultation with your specialist conservation advice. We have drafted the necessary letter of authorisation for your Authority to determine the application as you see fit and have referred this to the National Planning Casework Unit (NPCU) (copy attached).



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


HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.



You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

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

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

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

Yours sincerely

Claire Brady

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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

[REDACTED]
HistoricEngland.org.uk





Mr Gideon Stothard

Direct Dial: [REDACTED]

CORPORATION OF LONDON

LONDON

Our ref: L01448419

EC2P 2EJ

22 November 2022

Dear Mr Stothard

Arrangements for Handling Heritage Applications Direction 2021

**IBEX HOUSE, 42 - 47 MINORIES , LONDON EC3N 1DY
Application No. 21/00794/LBC**

Thank you for your letter of 21 October 2022 regarding further information on the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your Authority in determining the application.

Historic England Advice

We are pleased to see that our concerns raised in our letter of 18 January 2022 have been addressed by the proposed amendments.

We therefore wish to withdraw our previous concerns in relation to the application proposals.

Recommendation

Historic England has no objection to the application on heritage grounds.

In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.



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

[REDACTED]
HistoricEngland.org.uk



Your Authority should take these representations in account and determine the application in accordance with national and local planning policy and in consultation with your specialist conservation advice. We have drafted the necessary letter of authorisation for your Authority to determine the application as you see fit and have referred this to the National Planning Casework Unit (NPCU). You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

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

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

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

Yours sincerely

Claire Brady

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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

[REDACTED]
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Agenda Item 5

Committee:	Date:
Planning and Transportation	13 December 2022
Subject: Ibex House 42 - 47 Minories London EC3N 1DY Alteration and extension to the existing building at ground and lower ground floor on Haydon Street and Portsoken St with the incorporation of courtyard garden areas, an on-site servicing bay and blue badge parking areas adjacent; Roof level extensions at the 8th and 9th floors; Alterations to the ground floor Minories facade, including level access provision; Alteration and creation of roof terraces and green roofs; replacement / upgrade of balustrades on all elevations; internal reconfiguration of lower levels to incorporate a new mezzanine level, internal cycle storage, and refuse store; creation of a new learning / cultural centre at the ground floor corner of Portsoken Street and Minories; and retention of existing public house at ground floor / lower ground corner of Haydon Street and Minories including elevational alterations.	Public
Ward: Tower	For Decision
Registered No: 21/00794/LBC	Registered on: 28 October 2021
Conservation Area:	Listed Building: Grade II

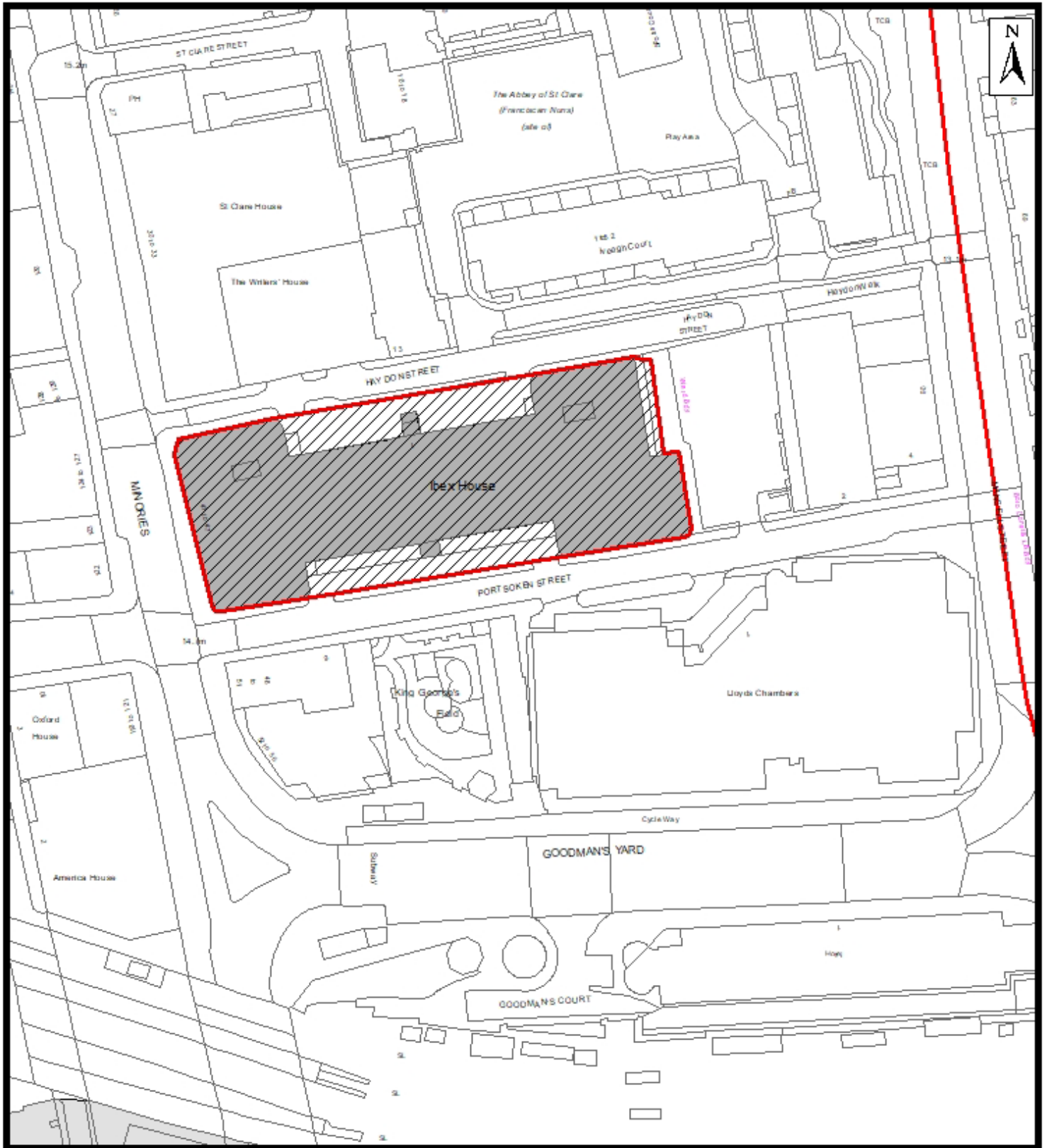
Summary

Refer to 21/00793/FULMAJ for full report

Recommendation

1. That listed building consent be granted for the above proposal in accordance with the details set out in the attached schedules subject to:
 - a) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notices not to be issued until the Section 106 obligations have been executed;
2. that your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.





Site Location Plan



© Crown copyright and database rights 2022 OS 100023243

ADDRESS:
Ibex House

CASE No.
21/00794/LBC

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY



ENVIRONMENT DEPARTMENT

Main Report

For report please refer to 21/00793/FULMAJ

APPENDIX A

Background Papers

Application Documents

Cover Letter, Savills, updated 11 October 2022

Design and Access Statement, updated October 2022

Ground Movement Assessment, Card Geotechnics Limited, September 2022
(Rev 1)

Heritage Statement, Stephen Levrant Heritage Architecture Ltd, October 2022

Structural Assessment (External Works – Planning Amendments), PARMAR
BROOK, updated October 2022

Updated UGF Calculation Plan, BB UK, Rev B, November 2022

Window Drawings and Schedules, Stephen Levrant Heritage Architecture Ltd,
updated October 2022

Correct Area Schedule Addendum to DAS, AHMM Architecture, November
2022

Addendum to Statement of Community Involvement, London Communications
Agency, October 2022

Statement of Community Involvement, London Communications Agency, 2
September 2021

Streamline Moderne Learning Gallery Statement, AHMM Architects, 7 October
2022

Archaeology Desk-Based Assessment, MOLA, May 2021

Geotechnical and Geo-environmental Interpretative Report, CGL, March 2021

Planning Statement, Savills, September 2021

External Consultee Responses

Historic England, updated response, 22 November 2022

Historic England, Letter, 18 January 2022

Historic England, Letter of authorisation to determine application, 18 January
2022

20th Century Society, Letter, 7 January 2022

Public Comments: Objections

Comment – Miss Panagiota Markaki – 5 January 2022

Comment – Mr Mital Patel – 12 December 2021

Comment – Mikael Boman – 3 January 2021

APPENDIX B

Relevant London Plan 2021 Policies

Policy HC1 Heritage conservation and growth

Relevant Draft City Plan 2036 Policies

HE1 Managing change to heritage assets

S11 Historic environment

Relevant Local Plan Policies

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

6. To resist the demolition of listed buildings.
7. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

SCHEDULE

APPLICATION: 21/00794/LBC

Ibex House, 42-47 Minories London

Alteration and extension to the existing building at ground and lower ground floor on Haydon Street and Portsoken St with the incorporation of courtyard garden areas, an on-site servicing bay and blue badge parking areas adjacent; Roof level extensions at the 8th and 9th floors; Alterations to the ground floor Minories Facade, including level access provision; Alteration and creation of roof terraces and green roofs; replacement / upgrade of balustrades on all elevations; internal reconfiguration of lower levels to incorporate a new mezzanine level, internal cycle storage, and refuse store; creation of a new learning / cultural centre at the ground floor corner of Portsoken Street and Minories; and retention of existing public house at ground floor / lower ground corner of Haydon Street and Minories including elevational alterations.

CONDITIONS

1. The works hereby permitted must be begun before the expiration of three years from the date of this consent.

REASON: To ensure compliance with the terms of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2. All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent.

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.

3. Before any works thereby affected are begun details shall be provided of the proposed protective measures for retained historic fabric and features for the duration of works on site shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and so retained thereafter.

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

4. The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of

demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur to be necessary.

REASON: To ensure the stability of the structure to be retained in accordance with the following policy of the Local Plan: DM12.3.

5. 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 permission shall be carried out in accordance with the approved details:

- a) Details of the proposed methodology for the removal and storage of existing glazing, faience, balustrades, and any other fabric or feature of interest along with details of their re-use.
- b) Samples and colour finishes of all external materials including a mock up panel of the black faience and typical crittall glazing.
- c) Details of junction of the new pavilions with existing fabric.
- d) Details of all external cleaning proposals.
- e) Details of the plant enclosure and fifth elevation for the plant.
- f) Detailed design and samples of materials for interior fit out at 1:20, 1:10 and 1:5 scale as appropriate, in respect to the proposed commercial spaces including the reception hub and circulation areas; the interior of the remodelled public house; the learning gallery and the interior of the pavilions, including circulation spaces.
- g) Construction details of the external sui generis use elevations at scale 1:20, 1:10 and 1:5 scale as appropriate.
- h) Construction details of the external public house elevation at scale 1:20; 1:10; 1:5 as appropriate.
- i) Construction details of all external elements of the pavilion extensions at scale 1:20, 1:10, 1:15 as appropriate.
- j) A detailed schedule with specifications for all repairs and replacement works to the historic building.
- k) Construction details of the new external entrance doors to Ibex House on Minories and level access provision at scale 1:10 and 1:5 as appropriate.
- l) Details regarding the retention of the existing public house chute and its reuse.
- m) Detailed design of the roof terraces and southern winter garden areas including hard and soft landscaping.
- n) Details of all external lighting to the building, including roof terraces.
- o) Details and materials samples of all proposed external areas and interfaces with the existing building

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM12.3.

6. Prior to the commencement of the relevant works a full Signage strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of design, location, fixing and lighting. The Applicant should note that separate advertising consent may be required.

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.

7. During and immediately after relevant opening up works commencing, a Historic Building Recording Level 2 is to be undertaken and in accordance with a written scheme of recording which shall be submitted to and approved in writing by the Local Planning Authority. This record shall include drawings and photographic records.

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.

8. The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under the conditions of this listed building consent:

18082_ZZ_ZZ_DR_A_PL001 P02
18082_ZZ_ZZ_DR_A_PL080 P02
18082_ZZ_LGF_DR_A_PL01L P02
18082_ZZ_M1_DR_A_PL01M P02
18082_ZZ_UGF_DR_A_PL010 P02
18082_ZZ_01_DR_A_PL011 P02
18082_ZZ_02_DR_A_PL012 P02
18082_ZZ_03_DR_A_PL013 P02
18082_ZZ_04_DR_A_PL014 P02
18082_ZZ_05_DR_A_PL015 P02
18082_ZZ_06_DR_A_PL016 P02
18082_ZZ_07_DR_A_PL017 P02
18082_ZZ_08_DR_A_PL018 P03
18082_ZZ_09_DR_A_PL019 P03
18082_ZZ_10_DR_A_PL010 P03
18082_ZZ_ZZ_DR_A_PL021 P02
18082_ZZ_ZZ_DR_A_PL022 P02
18082_ZZ_ZZ_DR_A_PL023 P02
18082_ZZ_ZZ_DR_A_PL024 P02
18082_ZZ_ZZ_DR_A_PL030 P02
18082_ZZ_ZZ_DR_A_PL031 P02
18082_ZZ_ZZ_DR_A_PL032 P02

18082_ZZ_ZZ_DR_A_PL034 P02
18082_ZZ_LGF_DR_A_PL10L P02
18082_ZZ_M1_DR_A_PL10M P02
18082_ZZ_UGF_DR_A_PL100 P02
18082_ZZ_01_DR_A_PL101 P02
18082_ZZ_02_DR_A_PL102 P02
18082_ZZ_03_DR_A_PL103 P02
18082_ZZ_04_DR_A_PL104 P02
18082_ZZ_05_DR_A_PL105 P02
18082_ZZ_05_DR_A_PL106 P02
18082_ZZ_07_DR_A_PL107 P02
18082_ZZ_08_DR_A_PL108 P02
18082_ZZ_09_DR_A_PL109 P02
18082_ZZ_10_DR_A_PL110 P02
18082_ZZ_ZZ_DR_A_PL201 P02
18082_ZZ_ZZ_DR_A_PL202 P02
18082_ZZ_ZZ_DR_A_PL203 P03
18082_ZZ_ZZ_DR_A_PL204 P02
18082_ZZ_ZZ_DR_A_PL300 P02
18082_ZZ_ZZ_DR_A_PL301 P03
18082_ZZ_ZZ_DR_A_PL302 P02
18082_ZZ_ZZ_DR_A_PL304 P02
00098-REV P04

INFORMATIVES

1. In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
2. AHMM should be retained for the detailed construction stage of the project.
3. This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.

This page is intentionally left blank