

# 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-  
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 Minorities 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 Minorities 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

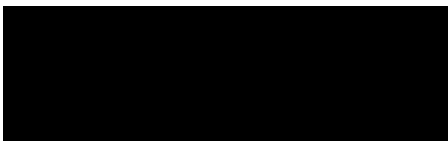
The Twentieth Century Society has concerns about the application on heritage grounds.

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 9<sup>th</sup> 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.





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](http://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](http://HistoricEngland.org.uk)





### **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](https://www.HistoricEngland.org.uk)





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](http://HistoricEngland.org.uk)





Historic England

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](http://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.*





Historic England

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](https://www.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.*



Historic England

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](http://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.*