

Memo

To Assistant Director (Development Management)
Department of the Built Environment

Email: [REDACTED]



From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection

Telephone [REDACTED]

Email [REDACTED]

Date 26 October 2023

Our Ref 23/02957/NPLN

Your Ref 23/01066/FULL

Subject City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure.

Thank you for your memorandum. I have reviewed the application and I have no objection to the granting of this application as the proposal will improve the dispersion of discharged gases.

Regards

[REDACTED]

Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

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Historic England

Ms Steph Taylor

Direct Dial: 020 7973 3764

City of London Corporation

Environment Department

Our ref: P01567678

26 October 2023

Dear Ms Taylor

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CITY OF LONDON SCHOOL FOR GIRLS ST GILES' TERRACE BARBICAN
LONDON EC2Y 8BB
Application No. 23/01066/FULL**

Thank you for your letter of 25 October 2023 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Please note that 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.



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

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Historic England

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

Charlotte Cartwright
Business Officer

E-mail: [REDACTED]



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Representing the interests of Barbican Residents

BA Planning Sub-Committee
c/o 307 Seddon House
Barbican,
London

FAO: Ms Steph Taylor
Planning Officer
Department of the Built Environment
City of London PO Box 270,
Guildhall.
London EC2P 2EJ

6th November 2023

Dear Ms Taylor

Re: City of London School for Girls; Ref: Planning application: 23/01066/FULL

I am writing on behalf of the Barbican Association to **object** to the above retrospective application “*for removal of 3 fume cupboard discharge flues and installation of 3 new extract flues to existing roof plant enclosure*”. The Barbican Association represents the 4500 or so residents who live on the estate and is also committed to preserving the design and heritage integrity of this grade II listed estate and grade II* listed landscape.

We note that this application is for retrospective listed buildings approval, given that the works for which permission is now sought have already been completed. We also note that this application is for full planning permission as the applicant had failed to submit such an application, only submitted an application for Listed Building Consent approval at the end of July. The application for Listed Building Consent approval was submitted on 28th July 2023 and the Barbican Association objected to this in its submission to the then case officer Ms Lin Zhao on 5th September 2023. This objection letter mirrors those views and are therefore repeated here.

The City should be corporately embarrassed that those responsible for a listed building that the City owns and manages did not seek listed building consent for works that affect the look of the exterior of the building and may breach the listed building management guidelines for the Barbican Estate (see for example volume IV 1.7.11.6).

We understand that these works on the school’s roof were originally intended to be “like for like” so that they would not need planning permission/listed building consent, but they got changed.

The effect of the change is to make visible on the roof of the school three upright pipes. As a resident who overlooks the area has commented; *“they extend above the roofline in a way the old (horizontal) pipes didn’t. And: they’re the only visible plumbing pipes anyone can see, certainly from my pretty extensive view - the architects of the estate would simply not have conceived of allowing them to be seen (the lack of visible pipework generally in the Barbican is quite brilliant).”*

The point is that upright pipes on roofs are not a characteristic of the Barbican’s architecture, and we object to them becoming so. We ask that the school reverts to using pipes that are horizontal or in any case do not extend above the roof.

Although officially “no planning permission sets a precedent” everybody knows that in practice once someone has done something, someone else will later point to that as a reason why they should do it too. These pipes will inevitably be used as justification for the next set of pipes the school wants to put on its roof.

The Design and Access statement says that the entire third floor and roof plant are not original elements of the heritage asset. But they are part of the listed estate, and at some stage they would have had listed building consent. That statement seems to show weak appreciation for the nature of listing. The Design and Access Statement also shows clearly that the original flues did not rise above the roof line and that the new ones do so. It explains the reasoning for the new flues but it does not justify their visibility above the roof line in heritage terms (and the flues were only painted a compliant colour once the problem had been pointed out). This is a feeble retrospective justification.

Had the CLSG sought listed building consent from the outset, an alternative solution that met the school’s requirements but did not spoil a heritage landscape might well have been arrived at.

John Allan, the architect who co-ordinated and wrote the Listed Building Management Guidelines for the City, commented at a Barbican Association/Barbican Centre workshop on the Barbican Estate at 50 that formal major projects were less of a threat to future integrity because they were the subject of formal applications. *“But continuous everyday change in a process of steady accumulation can alter progressively the nature of the architecture.”*

That is the risk here – we urge the City to reject this application, ensure that the school restores the pipes to their horizontal state and reminds it of its obligation to seek consents.

The Barbican Association often thinks that the City does not appreciate what a unique and world class example of urban design it has in the Barbican – as recognised in its listing. We hope it will show we are wrong by objecting to these pipes.

I attach to this letter some relevant extracts from volumes I and II of the Barbican Listed Building Management Guidelines.

Yours sincerely

Jane Smith
Chair, Barbican Association Planning Subcommittee

Extracts from Supplementary Planning Documents

Barbican and Golden Lane Conservation Area Supplementary Planning Document 1 February 2022

Overall character

The Barbican Estate is characterised by its singularity of composition, enormity of scale and sublimity of effect. It is less an aggregate of individual buildings and more a single, consistent piece of architecture that expresses its basic formula (bush-hammered concrete, orthogonal forms, lateral or vertical emphases) in a series of building typologies that are arranged to produce effects of void, depth and awe.

Barbican Estate Listed Building Management Guidelines Volume 1

City of London School for Girls.

The school is of special interest for the quality of its materials, the strongly architectural quality of its double-height spaces, staircase hall and infilled arcade, and for the way its complex plan fits logically into an awkward site. It has been extended by Dannatt. It was the first part of the Barbican complex to be completed.

5. ‘Special architectural and historic interest’ of Barbican Estate as a whole

5.3 The Barbican Estate is of special architectural and historic interest, and its significance is explored in detail in Volume II of these guidelines. Volume II deals specifically with the residential parts of the Barbican. Some sections are applicable to and would provide valuable guidance to all stakeholders intending to carry out works on the estate. Particular attention is drawn to Sections 2 - Special Interest (with particular regard to materials), 3.1 - External Elements, and 4. - Best Practice. These sections have relevant information which provide important guidance and indicate those works that are acceptable, those that may need consent, and works which will affect the special interest of the Barbican Estate to the extent that they are unlikely to receive approval.

Barbican Estate Listed Building Management Guidelines Volume 2

1.2.2.14 There is an ongoing cycle of repair and maintenance to the external fabric of the Barbican which must be implemented systematically within an informed Estatewide framework of best practice. This is of self-evident importance in ensuring that any major works projects are undertaken in full cognisance of the architectural significance of the buildings, and are prepared and executed with due process strictly observed. However it is equally important that cumulative minor works operations on the exterior of the buildings or public spaces do not impact adversely on the character and special interest of the Estate as a whole. Uncoordinated or thoughtless interventions – for example surface mounting of service installations, or ill-matched ‘repairs’ or replacements – can be highly detrimental to the overall sense of order and integrity of the original design. It is essential that effective protocols are applied and observed in the control and management of ‘small contract works’.

2.2.6 The other components of the complex – including the Barbican Centre, the City of London School for Girls, the Guildhall School of Music and Drama, the YMCA Hostel, the historic church of St Giles Cripplegate and fragments of Roman walling, the expanses of landscaping and water – are of vital significance in diversifying and enriching the amenities and social facilities of the Estate. Yet these are all contained within the residential framework. The significance of this is that much of the character and formal identity of the Barbican is vested in its residential buildings and the spatial interrelationship between them and these other components.

2.2.7 The limitation and effective control of any change in the external fabric of these buildings, and the exterior spaces they contain and define, is therefore of the utmost importance in preserving the special character and architectural integrity of the Barbican Estate as a whole.

3.1 Guidance for External Elements

3.1.5 BLACK Proposals for which a LBC application would be required but where consent is unlikely to be granted

These constitute works which would almost certainly have a detrimental effect on the character and special architectural interest of the residential blocks and therefore will require a LBC application. Any application to change or alter the mass, foot print, height and silhouette or the original architectural character of the elevations of any listed block is likely to be refused.

4.1 Best Practice for Roofs and Terraces

4.3.3 It is therefore vital that the works are carried out with care and through detailed examination to ensure that original service zones, containments (ducts/ trunking/conduits) and routes are used. When, and only when, such investigations indicate inadequacies within the existing services provisions should consideration be given to any new design. Extreme care should be exercised and detailed consideration must be given to ensure that the visual impact of the new proposals on the architecture is kept to an absolute minimum.

4.3.7 Cyclical maintenance, repairs or upgrade works should be carried out with due care and attention to eliminate the potential of any adverse impact on the architectural character and consistency of the Estate.

4.3.8 In general, new surface mounted services should be avoided, and any opportunity should be taken to remove non-original redundant services installations, adhoc additions and fixings.

4.3.9 The services fall into two broad but significant categories:

- Visible services; including plant distribution systems and fittings, on the external elevations and the roofscape and terraces, and on the inside of the communal internal areas. Being manifested visibly any such services, or new additions, are likely to affect architectural character and heritage significance and accordingly be subject to listed building consent.

Adjei, William

From: PLN - Comments
Subject: FW: 23/01066/FULL - City of London School for Girls

From: Brenda Szlesinger <
Sent: Wednesday, January 17, 2024 9:35 AM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Re: 23/01066/FULL - City of London School for Girls

THIS IS AN EXTERNAL EMAIL

Flat 112 Thomas More House
EC2Y 8BU

From: Brenda Szlesinger
Sent: Wednesday, November 29, 2023 9:05 AM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 23/01066/FULL - City of London School for Girls

THIS IS AN EXTERNAL EMAIL

The Barbican and Golden Lane Neighbourhood Forum objects to the above retrospective planning application on the following grounds:

- 1.The new pipes are not a like for like replacement of the previous flues.
- 2.The fact that neither listed buildings consent nor planning permission were sought prior to the works suggests a disrespect for both the planning process and important heritage assets
3. The replacement flues are not sympathetic to the surrounding Grade II listed landscape. The replacement flues substantially harm the setting of both the listed Estate and the Conservation Area.
4. Historically, Barbican services have been either decorative or integrated and obscured from view. The applicant's claim that the new flues are barely visible is simply not true.

We urge you to REJECT this application.

Barbican and Golden Lane Neighbourhood Forum

Registered business address: [20 Wenlock Road, London, England, N1 7GU](#)

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City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

30th November 2023

Dear Sir/Madam,

At its meeting on 16th November 2023 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.108 23/01066/FULL - City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Barbican and Golden Lane Conservation Area/Cripplegate Ward. Ward Club rep. David Ayres.

Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure.

There were no objections.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

Mrs. Julie Fox
Secretary



Historic England

Ms Steph Taylor
City of London Corporation
Environment Department

Direct Dial: 020 7973 3764

Our ref: P01567678
3 April 2024

Dear Ms Taylor

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CITY OF LONDON SCHOOL FOR GIRLS ST GILES' TERRACE BARBICAN
LONDON EC2Y 8BB
Application No. 23/01066/FULL**

Thank you for your letter of 25 October 2023 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Please note that 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



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Historic England

Charlotte Cartwright

Business Officer

E-mail: [REDACTED]



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Memo

To Assistant Director (Development Management)
Department of the Built Environment

Email: [REDACTED]



From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection

Telephone [REDACTED]

Email [REDACTED]

Date 04 April 2024

Our Ref 24/01960/NPLN

Your Ref 23/01066/FULL

Subject City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure (RECONSULTATION DUE TO AMENDED DRAWINGS AND ADDITIONAL INFORMATION). |

Thank you for your memorandum. I have reviewed the application and I would recommend that the following condition be attached to any consent :

(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 most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the 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.

City of London PO Box 270, Guildhall, London EC2P 2EJ

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www.cityoflondon.gov.uk

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

Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob:

