

Committee:	Date:
Planning Application Sub-Committee	10 th September 2024
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	Public
Ward: Cripplegate	For Decision
Registered No: 23/01066/FULL and 23/00825/LBC	Registered on: 28 th July 2023 and 27 th September 2023
Conservation Area: Barbican and Golden Lane	Listed Building: Yes

Summary

The site comprises the City of London School for Girls, St. Giles Terrace, Barbican, EC2Y 8BB. The proposal comprises retrospective application for works comprising three fume cupboard discharge flues from the existing roof plant enclosure.

The works result in a degree of visual impact by introducing additional external flues but the proposals would not be overly intrusive and there would have a neutral impact on the Barbican Estate (II), Barbican Estate and Golden Lane Conservation Area and the Barbican Estate Registered Historic Park and Garden (II*). The Estate is robust and architecturally striking and of a scale, detailed design, materiality and complexity, which can absorb these further incidental interventions. The proposals are necessary additions to support the continued utility operations of the CLSG.

Subject to conditions it is not considered that the works would have an undue impact on residential amenity.

Overall, the proposals are considered to accord with the development plan. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

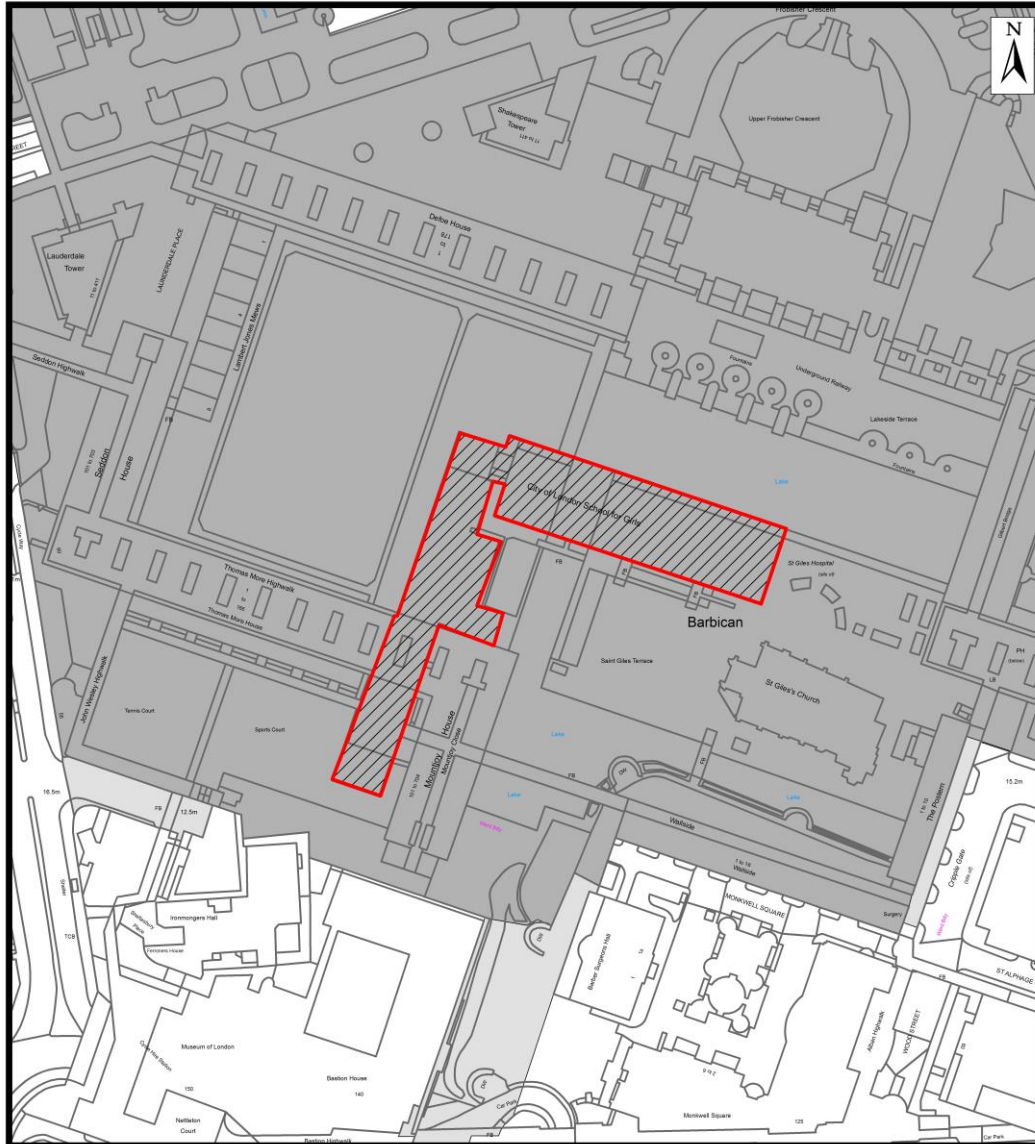
The Local Planning Authority ('LPA') must determine the application in accordance with the development plan unless other material consideration indicate otherwise. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan, and the other material considerations which do not support the proposal.

Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, it is considered that the proposed development complies with the development plan as a whole. Other material considerations also support the grant of planning permission. Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied.

Recommendation

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

Site Location Plan



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ADDRESS:
 City of London School for Girls
 St Giles' Terrace, Barbican

CASE No.
 23/01066/FULL

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



ENVIRONMENT DEPARTMENT

Main Report

Site and surrounding area

1. The Site is the City of London School for Girls, located in the Cripplesgate Ward within the Barbican Estate.
2. The Barbican Estate was designed by the architectural firm Chamberlin, Powell and Bon (CPB) and constructed between 1962 and 1982. The City of London School for Girls is integral to the architecture and the original ambitious masterplan vision part of the Barbican Estate. The school was among the first completed parts of the Barbican from 1965 onwards and has been the subject of various phases of development and refurbishment between 1975 and present.
3. The entirety of the Barbican Estate is designated as a Grade II listed building (2001) and is registered a Grade II* Registered Historic Park and Garden (2003). The Site is also located within the Barbican and Golden Lane Conservation Area (2019).

Planning History

4. Various planning applications have been made in respect of the City of London School for Girls and Barbican Estate but none are of relevance to the current proposal.

Background

5. The Level C Science classrooms within the City of London School of Girls have been recently refurbished, with the proposal for the new science classroom fume cupboards also requiring the installation of new flues to discharge any potentially contaminated air.
6. Previously, three extract ducts were installed on the roof plant room, two on the west elevation and one on the north elevation. The two flues on the western elevation featured vertical discharge stacks. The north elevation extract duct did not have a vertical discharge stack installed. The applicant has stated that in order to access the previously arranged flues, access to the plant room was via one small horizontal entrance into the plant room, which is also utilised by the extract ducts serving the science classrooms. When accessing the plant room space, maintenance workers would be required to use a transportable ladder placed against the edge of the entrance and work around the extract ducts.

7. The original Building Bulletin 88 'Fume Cupboards in Schools' has been replaced by CLEAPSS Guide G9 'Fume Cupboards in Schools', which provides guidance and specifications for the installation of fume cupboards in schools and colleges. The CLEAPSS Guide G9 document states that *'fumes should be discharged in a vertical direction at a minimum of 1 metre above the highest point of the building'*. This avoids the effects on fume cupboard performance of wind variations and eddies, e.g. at the edges of parapet roofs.
8. The CLEAPSS Guide G9 document goes on to say that the design and siting of the flues is important. If not installed correctly, contaminated air can re-enter the building via windows or ventilation inlets.
9. Subsequently, the applicant has carried out the installation of three new extract flues. The flues are installed on the north elevation of the roof plant room, and extend from their installation point to discharge one metre above the roof level. The extract flues are painted in a grey RAL 7004 to match the previous flues. The louvre is painted in a white RAL 9010 to match the existing.
10. In order to provide access to the roof plant room, a ladder which meets the requirements of Approved Document (K) has been installed which also necessitated the relocation of the extract ducts along the northern elevation.

Proposal

11. Planning permission and listed building consent is sought for the retrospective installation of the three fume cupboard extract flues to the existing roof plant enclosure. The works have already been carried out, and these applications were submitted following clarification as to what works required planning and listed building consent and which works would not. In this case, the latter comprises some internal works.

Amendments, Options and Justification

12. As originally submitted, the proposed works comprised three extract flues protruding from the northern elevation of the rooftop plant room and extending approximately 1,300mm above finished floor level. Following engagement with the project architect and agent, Cowan Architects, amendments to the proposal were submitted which reduced the height of the flues significantly to 700mm above finished floor level.
13. These amendments ensure that the proposed extracts terminate as low as possible while still meeting the relevant technical requirements. In addition, further information was submitted in the form of an updated Design and Access Statement and updated 3D modelling

information, providing detailed visual context, and summarising design limitations and access constraints.

14. A further consultation exercise was undertaken as a result, with no further objections or representations being received.

Consultations

15. As this is not a major planning application, the applicant is not required to provide a Statement of Community Involvement.
16. As part of the current application, the City of London Corporation acting as the Local Planning Authority ('LPA') has undertaken consultation with neighbouring residents in line with statutory duties.
17. Neighbour letters were sent to properties where views to the flues could be viewed from, namely Cromwell Tower, Defoe House, Lauderdale Tower, Thomas More House, Ben Jonson House, Lambert Jones Mews, Gilbert House and Seddon House. Site notices for both the planning and listed building consent applications were also posted in locations around the site. The applications were advertised via press notice and the 'weekly list'.
18. The application for planning permission was taken before the Conservation Area Advisory Committee who raised no objection.
19. Historic England and the Twentieth Century Society were also consulted. The Barbican Association, Barbican Estate and Barbican and Golden Lane Neighbourhood Forum were also consulted. Comments from statutory consultees should be given great weight.
20. Copies of all letters received and emails making representations are attached in full and appended to this report. A summary of the representations received, and consultation responses is set out in the table below.

Consultation Responses	
Barbican Residents Association	<p><i>Opposes the proposal. The pipes are visible from many parts of the estate, including Defoe Highwalk and the Arts Centre lakeside. The upright pipes on roofs are not a characteristic of the Barbican's architecture.</i></p> <p><u>Officer response:</u> Matters relating to the design of the proposal and the status of the existing</p>

	buildings are set out in the design and heritage section of this report.
Barbican and Golden Lane Neighbourhood Forum	<p><i>Opposes the proposal on the grounds that the works are not in keeping with the distinctive and historic character of the Barbican Estate.</i></p> <p><u>Officer Response</u> Matters relating to the design of the proposal and the heritage impacts therein are addressed in the latter parts of this report.</p>
Conservation Area Advisory Committee	No objection.
Twentieth Century Society	No comments received.

18. 19 objections have been received in total across the planning and listed building consent applications. These are summarised below, separated into the key themes raised throughout the representations made.

Representations (Objections)	Officer Response
Proposals are ugly/unsightly and appear industrial or utilitarian	These matters are addressed in the design section of this report.
Not in keeping with the listed school's roofscape	
Not in keeping with the listed status of the estate	
Did not discuss the work with residents	<p>While minor in scale and therefore not triggering a requirement for pre-application consultation or the submission of a Statement of Community Involvement with the planning application, the City of London would encourage engagement of residents.</p> <p>In this circumstance, the proposal has passed through two statutory consultation processes and as such has been publicised in accordance with the City of London's duty as Local Planning Authority.</p>
The works now face north, directly towards nearby residential uses, while	The current arrangement is influenced by the requirements of the existing plant enclosure and

the previous arrangement saw the works face west.	providing safe access. This is explored further in the background section above.
Original design across the Estate accommodated integrated services hidden from site, while these are utilitarian and visible from public walkways, lake, gardens and Barbican Centre, and homes	These matters are addressed in the design section of this report.
The works should have gone through planning before works started/objection to consent being gained retrospectively	Acting as Local Planning Authority, the City of London must accept retrospective applications for planning and listed building consent.
New pipes are more intrusive than the previous, and taller	These matters are addressed in the design section of this report. Additionally, the proposed works now comprise smaller flues than those now installed.
Supporting structure is visible and ugly	These matters are addressed in the design section of this report.
Although small scale, changes set a precedent of which there would be an accumulation of already inappropriate alterations, harming the setting of the Estate/nearby heritage assets	These matters are addressed in the design section of this report.
Like for like replacements, while available, have not been used	The proposal is assessed on its merits as part of this report. The proposed works have been amended during the course of the application.
No evidence that expert heritage advice had been sought	Cowan Architects as architect and agent have submitted sufficient information to validate both planning and listed building consent applications.
No alternatives have been considered	Alternatives have been considered during the course of the application, with an alternative proposal subject of this report and recommendation.
Are there air quality concerns, has an air quality report been submitted, and do the proposals comply with the City of London's Air Quality Strategy	These matters are addressed in the residential amenity section of this report and, in summary, Environmental Health Officers have confirmed that they have no air quality concerns related to the proposal.

Policy Context

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 A to this report.

The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation in Spring 2024. It is anticipated that the City Plan will be submitted to the Secretary of State in Summer 2024. Emerging policies are a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix A to this report.

Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.

The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets and Note 2 Managing Significance in Decision-Taking in the Historic Environment.

Relevant City Corporation Guidance and SPDs comprising the Barbican and Golden Lane Conservation Area Appraisal (City of London, 2022) and Barbican Listed Building Management Guidelines vol 1 (City of London, 2012)

Considerations

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).

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 (Section 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990). This duty must be given considerable weight and importance when weighing any harm to the setting of a listed building in the balance with other material considerations.

In determining a planning application for a building or land in the Barbican and Golden Lane Estates Conservation Area, special attention must be paid to the desirability of preserving or enhancing the character or appearance of that area (Section 72(1) Planning (Listed Buildings and Conservation Areas) Act 1990).

In determining a planning application for development which affects the Barbican Estate Registered Park and Garden, special regard must be had to preserving or enhancing the asset or its setting (Section 58B(1) Town and Country Planning Act 1990).

In considering the application for Listed Building Consent special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Section 16(2) Planning (Listed Buildings and Conservation Areas) Act 1990).

The National Planning Policy Framework (NPPF) states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social, and environmental.

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:
 - (i) 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

(ii) 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.

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).

Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive and sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.

Paragraph 139 of the NPPF states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 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.

Paragraph 203 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 I the desirability of new development making a positive contribution to local character and distinctiveness.”

Paragraph 205 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”.

Paragraph 206 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.

Paragraph 208 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 or any features of special architectural or historic interest which it possesses.

Adopted City Plan Policy CS10 (3) seeks to promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment, by; ensuring that development has an appropriate street level presence and

roofscape and a positive relationship to neighbouring buildings and spaces.

Adopted City Plan Policy DM10.1 (7) requires plant and building services equipment to be 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.

Emerging City Plan 2040 Policy S8(21) requires design solutions for plant and building services to be incorporated coherently into the architectural design. DE2(2k) states that the design of new development must ensure that; the plant and building services equipment are fully screened from view and integrated into the design of the building such that there are no adverse impacts on amenity in surrounding areas.

The Barbican Estate Listed Building Management Guidelines SPD 2012 sets out the significance of the Barbican Estate. The Barbican and Golden Lane Estate Conservation Area Appraisal 2022 describes the character and appearance and significance of the Conservation Area.

Relevant Statutory Duties

19. 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).

Considerations

20. 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.

21. 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.
 - The extent to which the proposals comply with Government guidance (NPPF).
22. The principal site-specific issues in considering this application (in accordance with the over-arching issues above) are:
 - Design and heritage, with particular regard to the special architectural and historic interest and heritage significance of the City of London School for Girls building within the listed Barbican Estate (II), and the character, appearance and significance of the Barbican and Golden Lane Conservation Area and Barbican Estate Registered Historic Park and Garden (II*).
 - Residential amenity.
23. These issues are considered in further detail below.

Design and Heritage

Design assessment, impact and conclusion

24. The proposed vertical discharge flues would be located to the north elevation of the western plant room roof exiting via existing louvres. The services are consolidated together, rise to 700mm above the finished flat roof level and terminate significantly below the apex of the plant roof and are supported by simple infrastructure. The services are also set some distance back from the northern building line towards the main body of the school. The pipework and infrastructure have been colour coded to blend with the background architecture of the louvres to further mitigate any potential visual impacts. The visual impacts are limited due to the positioning and scale of the modest addition confined to from some apartments to the north and west including: directly from Defoe House; and glimpsed in the distance from Seddon House; the reduced height of the proposals means the flues would now not be visible from apartments within Thomas Moore House but screened by the hipped roof to the plant room. From the public spaces around the Barbican there would be some visibility from the southern perimeter of Defoe Place but the reduced height by

600mm of the flues diminishes any wider significant visual impacts.

25. Where often momentarily glimpsed the flues would neither be prominent nor dominant and would be part of a relatively utilitarian roofscape and readily understood as incidental additions sitting alongside existing, practical structures associated with the functionality of the building including rooflights, balustrades and access ladders. The proposals would be entirely subordinate to the existing building, which is robust, architecturally striking and of a scale, materiality and detailed design which can absorb these subordinate interventions. The additional proposed access ladder to ensure safety would blend with existing similar structures.
26. The proposals are considered to integrate into the design of the building and would not adversely affect the character, appearance or amenities of the building or area or be unduly unsightly and would comply with Local Plan 2015 policies CS10, DM10.1, and draft City Plan policies DE2 (k).

Heritage – Direct Impacts

Barbican (Grade II*)

Heritage Significance:

27. In 2001 the whole of the Barbican Estate was listed, including landscaping and public areas, due to the pioneering design concepts employed by the architects which successfully combined a variety of uses across a large estate of dense, high-quality housing. The special interest of the Barbican Estate as a whole derives from the following values:

Historic Interest:

28. Barbican Estate was developed over a 20-year period between 1963 and 1982, designed by Chamberlain Powell and Bon with the CLSG building being one of the first completed blocks.
29. The Estate is a unique example of coherent inner city planning in the early postwar era, an exemplar of the Brutalist movement successfully combining a wide variety of uses including educational across a large estate of dense high-quality housing and realising key aspects of

contemporary planning including high-walks and megastructure.

30. Like other institutions within the Barbican Estate, the CLSG presence within the Barbican adds to the breadth of activities undertaken within the estate and adds a multi-generational vivacity to the place, embodying the optimism underpinning the masterplan.

Architectural and Artistic Interest:

31. The following values are considered to contribute to the architectural and artistic interest of the Estate:
 - The Barbican Centre as a centre of cultural excellence, with theatres, concert hall, cinemas, art gallery, library, conservatory and concert rooms. As well as a home for the CLSG, Guildhall School of Music & Drama feeding into the Barbican's investment in the cultural arts.
 - Uniquely combines a wide variety of uses across a large estate of dense, high quality housing, the Barbican Estate is a unique example of coherent inner city planning in the early post-war era combining key planning themes their time including highwalks and mega structures.
 - The plan form of the Barbican and its composition as a complete totality. This results from the integrated relationship between its buildings, spaces, canals and podium walkways.
 - The integral nature of the landscape design, demonstrating an evolving use of landscape within the estate while maintaining clear design intentions across the developments.
 - Structural expression of individual buildings such as barrel vaulted roofs and balconies associated with residential blocks, the scale and rhythm of columns, edge beams representing a three dimensional approach to masterplanning.
 - Consistent use of architectural language and limited palette of materials.
 - The Estate stands distinct from its surrounding area, both in terms of its overall scale, raised car free podium and in the differentiation of its unique architectural language.
32. The CLSG embodies the key values of the overall Estate. The school is designed in a distinctive idiom within the overall complex, but shares the architectural language and materials of the Estate including red semi-engineering brick on reinforced concrete frame, with exposed

concrete in piers and beams. The main block is of four storeys and semibasement, with a two-storey wing to side, which incorporates gymnasium and swimming pool. The main block has strong external grid of timber and aluminium windows recessed behind projecting brick piers with concrete tops. Surmounting this is a more lightweight roof set back on all elevations comprising four classroom spaces with connecting pavilions and two plant rooms with glazed roofs. There are minor alterations at this level including additional rooflights and an infill to the eastern most classroom and other functional utilitarian additions such as ladders and balustrades,

33. The planning of CLSG is also ingenious in fitting in a large school within the confines of the available site, inter-connecting with residential blocks to make maximum use of the limited space available. Internally 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 the double glazed hardwood windows and integral blinds.
34. The largest interventions to CLGS include the Dannatt Johnson addition of 1991 to the lower wing, alterations to the main entrance area internal and external all of which are considered to be of neutral significance. Other alterations are largely related to servicing, waterproofing, mechanical engineering and are functional in nature.

Archaeological Interest:

35. The designated heritage asset does not have any identified archaeological interest.

Impact

36. The proposed vertical discharge flues would be located to the north elevation of the western plant room roof exiting via existing louvres, The three pipes are consolidated together, rise to 700mm above the finished roof level and terminate significantly below the apex of the pitched roof to the plant area with support infrastructure. These are set some distance back from the building line of the main body of the school building towards of the centre of the roof. The pipework has been colour coded to blend with the background architecture of the

louvres to integrating the supporting structure and flues with the existing roofscape to further mitigate any potential visual impacts.

37. The scale of the addition relative to the overall CLSG complex and inset position on the roof results in an almost negligible visual impact. These impacts are limited due to the positioning and scale of the modest addition confined to some apartments to the north and west from: Defoe House; and glimpsed in the distance from Seddon House; the reduced height of the proposals means the flues would now not be visible from apartments within Thomas Moore House but screened by the hipped roof to the plant room. From the public spaces around the Barbican there would be some limited visibility from: the high level interior spaces of the Arts Centre; southern perimeter of Defoe Place but 600mm reduction in height of the flues diminishes any wider significant visual impacts. These small flues would read as discreet often fleetingly utilitarian services associated with the plant room and are expected additions at roof level.
38. The additions would neither be distracting from the overall architectural robustness and defining characteristics of the school, nor from its relationship with St Giles's Terrace, the Barbican Lakeside, surrounding lakes, public and private open spaces and Highwalks or the wider Barbican Estate. In all cases these elements and interplay between different megastructure components and the consistent materiality would be preserved. Nor would the additions be prominent or incongruous but instead would be readily understood if noticed as a functionality of the CLSG and part of the nature of its use. The roof of CLSG is not entirely pristine and the proposals would sit alongside rooflights, access ladders and balustrades at roof level.
39. These further minor visual additions would be neutral, are necessary and can be absorbed into the robust character, materials, and scale of the Barbican Estate and there would be no harm to the special architectural or historic interest underpinning its significance.
40. The internal changes to accommodate the flues and improved access within the plant areas do not affect areas of heritage significance and would have a neutral impact.

Barbican and Golden Lane Estate Conservation Area (BGLE Conservation Area)

Heritage Significance:

41. The significance of the Conservation Area is set out in the Barbican and Golden Lane Estates Conservation Area Appraisal 2022. The area is characterised by two distinct developments: Golden Lane Estate to the north and Barbican Estate to the south. The characteristics which contribute to the special interest of the Conservation Area are:
- Overarchingly, the character, appearance and heritage significance of the conservation area can be summarised as the striking juxtaposition between two seminal post-war housing Estates by Chamberlain, Powell and Moya which illustrate evolving trends in architecture, spatial and urban planning and Modernism in general.
 - Integration of the ancient remains of the Roman and medieval City wall, including Bastions 12, 13 and 14 and the medieval church of St Giles Cripplegate in a strikingly modern context.
 - In scope and extent, the estates are important visual evidence of the scale of devastation wrought by the WW2 'Blitz' bombing campaign of 1940-41.
 - Seminal examples of ambitious post-war housing schemes incorporating radical, modern ideas of architecture and spatial planning reflecting the development of both Modernism and Brutalism.
 - Unprecedented and ingenious provision of open space and gardens within central London, which continue to be a defining characteristic of the estates today.
 - New and striking architectural idioms, particularly at the Barbican, applied on a significant scale; a new architectural language deliberately modern and forward-looking; a way of planning and arranging buildings and spaces which was unprecedented in Britain and reflected evolving ideas of the modern city.
 - The pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience strikingly at odds with the more traditional townscapes and buildings outside the boundary.
42. CLSG as a component embodies these characteristics of the Conservation Area.

Impact

43. The proposed vertical discharge flues would be located to the north elevation of the western plant room roof exiting via existing louvres, The three pipes are consolidated together, rise to 700mm above the finished roof level and terminate significantly below the apex of the hipped roof to the plant area. The services are also set some distance back from the northern building line of the main body of the school towards the centre of the roof. The flues and supporting structure have been colour coded to blend with the background architecture to further mitigate impacts.
44. The scale of the addition relative to the CLSG and inset position on the roof results in an almost negligible visual impact. These impacts are limited due to the positioning and scale of the modest addition confined to some apartments to the north and west from: Defoe House; and glimpsed in the distance from Seddon House; the reduced height of the proposals means the flues would now not be visible from apartments within Thomas Moore House but screened by the hipped roof to the plant room. From the public spaces around the Barbican there would be some limited visibility from: the southern perimeter of Defoe Place but 600mm reduction in height of the flues diminishes any wider significant visual impacts. These small flues would read as discreet often fleetingly utilitarian services associated with the plant room and are expected additions at roof level.
45. The additions would not distract from the overall architectural robustness and defining characteristics of the school or its relationship with St Giles's Terrace, Barbican Lakeside, public and private open spaces and Highwalks or the wider Barbican and Golden Lane Estate Conservation Area and all relevant elements within key views would be preserved. The flues sit below the uppermost apex of the building and would not be unduly prominent or incongruous but instead would be readily understood if noticed as a functionality of the CLSG and part of the nature of its use. The roof of CLSG is not entirely pristine and these minor visual servicing additions are an incidental visual occurrence which is experienced throughout the rooftops of other buildings within the BGLE Conservation Area. There would be no adverse impacts on kinetic views and vistas through the Conservation Area.
46. Overall, any visual impacts to the character and appearance of the

BGLE Conservation Area would be neutral and be absorbed into its robust character, scale and complexity. The proposal would preserve the significance, setting, character and appearance of the Barbican and Golden Lane Estates Conservation Area.

Barbican Estate Registered Historic Park and Garden (RPG) (Grade II*)

Heritage Significance:

47. The landscape of the Barbican Estate was conceived and designed as an integral part of the architectural design by Chamberlain, Powell and Bonn with the architects recognising that the spaces between the buildings were of equal importance to the structures themselves. The landscape is now designated as a grade II* Registered Historic Park and Garden (2003), and, along with Alexandra Road Park, is one of only two post-war landscapes designated above Grade II within Greater London. Its heritage significance is derived from the following values:
- The creation of the Barbican as a vehicle-free environment through the raising of the precinct above ground level on the podium, creating vehicle-free space the quality and quantity of which is unparalleled in London.
 - The raised ground of the podium and the highwalks as an intrinsic and distinctive feature of the estate. The raised ground provides viewpoints from which to survey the surrounding city below, and, together with the limited entrances to the complex at ground level, contributes to the conception of the Barbican as fortified structure from the surrounding streets.
 - The contrast of the planning of the Estate with the grain and plan of the surrounding townscape, and the creation of characteristically unique dramatic vistas across the estate and into the surrounding townscape.
 - The successful designed relationships with 'found' historic elements including the Roman and Medieval wall, and the Church of St Giles Cripplegate and associated gravestones.
 - The urban character of the Barbican, and its conception and realisation as a new piece of urban fabric designed and delivered in its entirety by a single client and architect.
 - The consistent use of a small number of materials and detailing across the estate, delivering a powerful sense of visual continuity and consistency to the estate.

- The impact of soft landscaping and the value of experiencing the architecture of the Barbican in the context of trees, foliage, and greenery.

Impact on the heritage significance on the Barbican Registered Historic Park and Garden

48. The proposed vertical discharge flues and infrastructure would be located to the north elevation of the western plant room roof exiting via existing louvres. The three pipes are consolidated together, would rise to 700mm above the finished roof level and terminate significantly below the apex of the pitched roof to the plant area. These are also set some distance back from the building line of the main body of the school building. The pipework has been colour coded to blend with the background architecture has been colour coded to integrate with the background to further mitigate impacts.
49. Given the high level location, set back position on the CLSG and modest scale of the proposal any impacts on the Historic Registered Park and Garden would be minimal. Where there is visibility from the immediate Defoe Place this is very contained and the modest flues would read as discreet utilitarian services associated with the plant room and are expected additions at roof level which have no association with the public spaces. There would be no adverse impacts on key vistas or kinetic views across the landscape, between buildings and public spaces and walkways. The additional proposed access ladder to ensure safety would blend with existing similar structures.
50. The proposed development would have no impact on the identified values which contribute to the significance of the Barbican Estate landscape.

Overall conclusion on heritage:

51. Through the course of the application any potential harmful impacts to the designated heritage assets have been mitigated through reductions in height to the flues and changes in colour. Different options have been explored and the current proposals are supported by a clear and convincing justification to meet Building Regulations and enable the continued functioning of the CLSG science teaching functions and this satisfies para 20.

52. The proposals would have a neutral impact on the: special architectural and historic interest of the Barbican Estate as a listed building; the character and appearance of the Barbican and Golden Lane Conservation Area; and the significance of the Barbican Registered Park and Garden. The proposals would accord with Local Plan Policies CS 12 and DM 12.1, 12.2, 12.3 and 12.5 emerging City Plan policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs.

Residential Amenity

53. London Plan policy D13 ('Agent of Change') and Policy D14 ('Noise') requires development to limit and mitigate noise impacts from proposals.
54. Local Plan Policies CS21 (Housing) and DM21.3 ('Residential Environment') and draft City Plan policies S3 and HS3, requires amenity of existing residents in identified residential areas to be protected. Local Plan policy DM15.7 and Draft City Plan policy HL3 require noise pollution to be considered.
55. Local Plan policy DM10.7, draft City Plan policy DE8, and London Plan policy D6 to consider the impact of development on existing daylight and sunlight of residential properties.

Noise

56. Subject to control of noise through attachment of related conditions, the Environmental Health consultee has confirmed that they would have no objections. These conditions are proposed to be attached, ensuring that the noise level emitted is a minimum of 10 dBA below background noise level when measured from the nearest noise sensitive use. This is then monitored through a further condition requiring that noise measurements be taken and submitted for approval, demonstrating that this standard is met.

Air Quality

57. Environmental Health have confirmed that they would hold no objection to the increase in flue extracts proposed given this would improve the dispersion of discharged gases. The flue extracts themselves serve internal fume cupboard associated with the science

classrooms themselves, and thus any gas dispersed through these flumes would be commensurate to such a use. As such, there are no air quality concerns related to the works.

58. Concerning the reduction in height of the proposed flues from that as installed currently on site, further technical confirmation has been received that the distance between the flues at their amended height and the nearest opening to the building would be sufficient, in the context of the velocity of the dispersal of fumes, that there would be no risk of backspill and this would accord with the recommendations of the CLEAPSS guidance.

Daylight and Sunlight

59. The three pipes, falling significantly below the apex of the pitched roof, as well as being set back from the nearest roof edge by c. six metres and forty-five metres from the nearest residential neighbour, would give rise to no concerns as to daylight and sunlight impacts.

Conclusion on Amenity Impacts

60. It is not considered that the proposal would have an undue impact on residential amenity in accordance with relevant policies, subject to recommended conditions.

Sustainability

61. London Plan policy GG6 states that development should seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050 and to ensure buildings and infrastructure are designed to adapt to a changing climate including through making efficient use of water, and take an integrated and smart approach to the delivery of local infrastructure.
62. Local Plan Policy CS15 and Draft City Plan policy DE1 seeks to ensure development achieves highest feasible sustainability standards. Local Plan policies DM15.3 and DM15.5 require low and zero carbon technologies and commitment to climate change resilience measures and adaptation.
63. The purpose of the flues subject to this application is to best serve science classrooms within the building which feature fume cupboards.

As such, they are a necessity as driven by the nature of fume cupboards rather than a part of any upgrade or replacement of plant machinery on site. In this context, there are no sustainability concerns regarding the works.

Public Sector Equalities Duty

64. When considering the proposed development, the Public Sector Equality Duty (PSED) 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.
65. 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
66. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
67. 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.
68. This application has been assessed against the Equality Act 2010 and any equality impacts identified. The Applicants have held a range of meetings with stakeholders.
69. Potential impacts of the proposed development on the nearby occupiers have been assessed, including the impacts on the use and functionality of the spaces. Officers do not consider that nearby occupiers would be detrimentally impacted in so far as these spaces become unusable nor would it be considered that there would be disadvantages or material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

Human Rights Act 1998

70. 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”).
71. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate.
72. As set out above, it is the view of officers that there would be no infringement of Article 8 of the ECHR.

Conclusion

73. There would be a degree of visual impact by introducing additional external flues but the proposals would not be overly intrusive and there would have a neutral impact on the Barbican Estate (II), Barbican Estate and Golden Lane Conservation Area and the Barbican Estate Registered Historic Park and Garden (II*). The Estate is robust and architecturally striking and of a scale, detailed design, materiality and complexity, which can absorb these further incidental interventions. The proposals are necessary additions to support the continued operations of the CLSG.
74. Subject to conditions it is not considered that the works would have an undue impact on residential amenity.
75. Overall, the proposals are considered to accord with the development plan. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

Appendix A – Background Papers

Drawings Titled:

0100 Rev. P1 – Site Location Plan

0150 Rev. P1 – Existing Upper Roof Plan

0151 Rev P1 – Proposed Upper Floor Plan

0153 Rev. P2 – Existing and Proposed 3D Views

0154 Rev. P2 – New Roof Flue Proposal – Reduced Flue Height

0155 Rev. P2 – Roof Enclosure Elevations, Previous, Current and Proposed Situation

Documents Titled:

Design and Access and Heritage Statement – Revised Version

Design and Access and Heritage Statement - Submission Version
(Superseded)

Design Statement - Public Vistas and Visual Context

Design Statement Summary

List of Neighbouring Objections

Amran Vance

Dr Paul Simmons

Sandra Jenner

Helen Hudson

Helen Clifford

Robert Hawkins

Simon Cooper

Eleanor Duffer

Dr Ruth Holt

Rodney Jagelman

David Mackie

Laurien Farmer

Nicholas Deakin
Dr Martin Farebrother
Richard Tomblin
Dr Richard Collins
Jan-Marc Petroschka
Brenda Szlesinger
Michael Jackso

List of Statutory Consultees Responses

Environmental Health Officer (x 2)
Historic England
Barbican Association
Conservation Area Advisory Committee
Hisotic England

Appendix B – Relevant Policies

Relevant London Plan Policies

HC1: Heritage conservation and growth

D6: Housing Quality and Standards

D13: Agent of Change

D14: Noise

GG6: Increasing efficiency and resilience

Relevant Draft City Plan 2040 Policies

S11: Historic Environment

HE1: Managing Change to Heritage Assets

S8: Design

IN1: Infrastructure provision and connection

DE1: Sustainability Standards

DE2: New Development

DE8: Daylight and sunlight

S3: Housing

HS3: Residential Environment

HL3: Noise and light pollution

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.

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.

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.

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.

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

1. 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.
2. 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.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

DM15.7 Noise and light pollution

1. 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.
2. 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.
3. 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.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. 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.

DM10.7 Daylight and sunlight

- 1) 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.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

Policy DM 12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. 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.

DM2.1 Infrastructure provision

- 1) 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.
- 2) 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.

3) 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.

4) 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.

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.

DM15.3 Low and zero carbon technologies

1. 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.

2. 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

3. 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.
4. 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.

DM15.5 Climate change resilience

1. 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.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

SCHEDULE

APPLICATION: 23/01066/FULL and 23/00825/LBC

City of London School for Girls, St. Giles Terrace, Barbican, EC2Y 8BB

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

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 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.

- 3 a) Proposed materials for the shortened fume extract pipework subject to this consent will be submitted for approval to the Local Planning Authority.

b) A notice of completion must be provided to the Local Planning Authority within two months of completion of the proposed works.

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: CS10, DM10.1, DM12.2, DM12.3 and emerging policies DE2, and HE1 of the Draft City Plan 2040

- 6 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: 0100 Rev. P1, 0150 Rev. P1, 0151 Rev P1, 0153 Rev. P2, 0154 Rev. P2, 0155 Rev. P2.

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 This approval relates only to the details listed above and must not be construed as approval of any other details shown on the approved drawings.
- 3 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.