

City of London  
Local Development Framework

**Supplementary Planning Document**  
Barbican Listed Building Management Guidelines

**Appendix 1 - Statement of Consultation**

**September/October 2012**



The Barbican Listed Building Management Guidelines Supplementary Planning Documents (SPD) form part of the City of London Local Development Framework (LDF). They were published for public consultation during a six-week period from 26<sup>th</sup> May to 9<sup>th</sup> July 2012.

The City Corporation has prepared a statement setting out a summary of the main issues raised in the representations made by the public in response to the consultation and how these have been addressed in the adopted SPD.

Consultation on the Barbican Listed Building Management Guidelines SPD was carried out concurrently with three Conservation Area SPDs. The following measures were taken to consult the public on the SPDs during the consultation period:

**Website.** The SPDs, the SPD documents and a statement of the SPD matters were made available on the City Corporation's web site. Information and a link were provided on the home page of the City's website and on the landing page of the Planning section of the website to ensure maximum exposure. The Corporate Twitter account was used to 'tweet' the details of the consultation at the start of the consultation period. Information was provided in the City of London eshot.

**Inspection copies.** A copy of the SPDs, the SPD documents and a statement of the SPD matters was made available at the Planning Information desk at the Guildhall and the Guildhall, Barbican and Shoe Lane public libraries.

**Notifications.** Letters and emails containing information about the SPDs and inviting comments were sent to relevant specific and general consultation bodies. The City Corporation maintains a database of all those who have expressed an interest in the LDF, and letters or emails were also sent to all those on the list. In addition, an email was sent to the Chair of each House Group on the Barbican Estate, and an email was sent to a list of 800 Barbican Residents.

**Local advertisement.** Posters and leaflets advertising the Barbican Listed Building Management Guidelines SPD consultation and inviting comments were placed in the Guildhall, Barbican and Shoe Lane public libraries. 150 posters were placed on Noticeboards around the Barbican Estate.

**Meetings.** In preparation of the draft, prior to the public consultation, 9 meetings were held with the Barbican Listed Building Management Guidelines Working Party, and 1 meeting with non-residential stakeholders. A presentation was also given to the Barbican Occupiers Users Group.

**Pre- Public Consultation Input.** During pre-consultation meetings, the Barbican Listed Building Management Guidelines Working Party raised a concern regarding the text in Volume I which did not sufficiently emphasise the entirety of the estate being listed. Many of the subsequent changes to Volume I addressed this issue, providing greater clarity regarding the extent of Statutory listing and ramifications of this for all stakeholders and users of the estate. Volume II applies to the residential part of the estate, but the information in Volume I apply to the entire Barbican Estate. In addition to this there were numerous textual changes suggested by the Working Party, which were incorporated into the document and presented for the public consultation.

**Comments.** Comments on the Barbican Listed Building Management Guidelines were received from English Heritage, the Barbican Association, The Theatres Trust, and members of the public. The tables that follow summarise the comments and explain how they were addressed in finalising the SPD.

## Summary of comments and responses

From	Comment	Response
<p><b>English Heritage</b></p>	<p>Thank you for the opportunity to provide comments on the Barbican Listed Building Management Guidelines draft Supplementary Planning Document (SPD). As the Government's adviser on the historic environment, English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all levels of local planning.</p> <p>Having reviewed the document we are pleased to see that the draft SPD provides a robust framework in which to manage the listed buildings at the Barbican. With this in mind we generally support the revisions proposed. However we would suggest that the latest legislation and policy context is referenced. For example paragraph 6.14 still refers to PPS5, when this should be replaced with the National Planning policy Framework (March 2012).</p> <p>In terms of the Screening Statement, English Heritage agrees with the City of London conclusions that sustainability appraisal of the draft SPD is not required.</p> <p>Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise in relation to this or later versions of these SPD, and which may have adverse effects on the historic environment.</p>	<p><b>Comment Accepted.</b> The suggested changes have been made to Volume I, paragraphs 6.1 and 6.14</p>

From	Comment	Response
<p><b>Robert Barker</b></p>	<p>May I point out what appears to be a typographic error in the Draft Barbican Listed Building Management Guidelines? In vol I, paragraph 4.21, line 11, delete word "sionon", insert "in".</p>	<p><b>Comment accepted</b> Suggested change made</p>
<p><b>Margaret Woodruff</b></p>	<p><b>(1.)</b> I'd like to comment that there is a continuing and significant problem for both residents and the general public caused by the use of public Podium areas by skateboarders, in-line skaters, stunt cyclists and the sport known as 'free running' or 'Parkour'.</p> <p><b>(2.)</b> All of these activities are in their own ways damaging to the vulnerable fabric of the Podium, most particularly to the tiled surfaces on walkways, benches and other features. Wooden benches have also been severely damaged.</p> <p>The effect of such damage, combined with an apparently slow repair response to affected areas has been a marked increase in anti-social behaviour both from the groups of youths who indulge in such activity and from other groups who gather on the Podium increasingly during the night and cause disturbance to residents as well as littering and other damage.</p> <p><b>(3.)</b>In the past certain measures have been adopted to make skateboarding and skating more difficult such as the placing of chicanes and I would like to suggest that some parameters be stated in the document showing what range of measures would be considered acceptable within Listed Building guidelines to ensure that areas designed for the enjoyment and relaxation of the general public are not in future increasingly surrendered to large anti-social gangs of youths. This might also include more informative signage at Estate entry points.</p> <p><b>(4.)</b> A small point, I'd also like to see Ben Jonson House spelled correctly in official documents.</p>	<p><b>(1.) Comment noted.</b> - Anti-skateboard measures have been installed across the estate on surfaces, walkways and benches. This can be dealt with as part of the landscaping volume.</p> <p><b>(2.)</b> Should there be a need for additional measures to be installed, the Barbican Estate will manage the process. The speed at which repairs are undertaken and the management of anti-social behaviour is not within the remit of the Management Guidelines, however, this comment has been forwarded to the Barbican Estate Office.</p> <p><b>(3.) Comment noted</b> – This is an issue of management of the estate.</p> <p><b>(4.) Comment Accepted</b> - We are unable to alter the misspelling of Ben Jonson house within the statutory list description, however elsewhere in the document the correction has been made.</p>

From	Comment	Response
<p><b>Barbican Association</b></p>	<p>I write as Chair of the Barbican Association in response to the public consultation on the Draft revised Barbican Listed Building Management Guidelines.</p> <p>The Barbican Association welcomes the review process that has led to this draft, with a working party which included two members of the Barbican Association's General Council (one of whom is also the Chair of the Barbican Residents' Consultation committee). We are grateful for the guidance and assistance given by the officers in the Department of the Built Environment during the process and we believe that this procedure forms a model that could be utilised by others in the future.</p> <p>We welcome this Draft revised Barbican Listed Building Management Guidelines and are not suggesting any amendments.</p> <p>In particular, we are pleased with the hard work that has been put into "Volume I – Introduction", which covers the whole of the Barbican listed curtilage, especially the inclusion of the description of the Grade II* Registered Park and Garden, and fully support the additional detail in sections 4, 5 and 6 of this volume.</p> <p>However, we do have a couple of points to make about the implementation of the Listed Building Management Guidelines.</p> <p><b>(1.)</b>The great majority of the publicly visible additions and alterations that have taken place under the Barbican Listed Building Management Guidelines have been undertaken by departments for which the City of London has responsibility including the Barbican Estate Office, Barbican Centre, Guildhall School of Music and Drama, City of London School for Girls and the Department of the Built Environment.</p> <p><b>(2.)</b> We were greatly disappointed to learn during the review process to learn that no detailed records were kept by the Department of the Built Environment of advice given to other City departments when it was decided that additions and / or alterations could be made but that Listed Building Consent would not be necessary. We strongly recommend that, in such instances, the advice is given in writing and that the detailed advice is recorded in such a way that it is available to both the Department of the Built Environment and the department carrying out the work and other City</p>	<p><b>Comment Noted</b></p> <p><b>(1.)</b> It should be noted that Volume II which provides Management Guidelines, relates only to the residential part of the estate. The remaining areas of the Barbican fall under Volume I which identify the special interest, but carry no detailed management guidance. As such, each application for work has been dealt with on a case by case basis. Works undertaken by the Barbican Estate on the residential part of the estate have been carried out with reference to the guidelines, and by assessing the effect that the proposed works will have on the architectural Significance of the building.</p> <p><b>(2.)</b> This issue was raised during the review process, by members of the Working Party. A response was provided at the time. See below</p> <p>We can provide approximate statistics for green category work, but we do not record every enquiry and case that comes in for the following reasons</p> <ul style="list-style-type: none"> <li>-Some are dealt with by the Call centre. At the time of the Guidelines being adopted, the CoL Call Centre was being set up. We did not know how this would develop, and it now takes a higher number of calls/enquiries that previously would have been referred to this Department. This is a CoL-wide service that has grown over the past 4 years.</li> <li>-Resources are limited. The agreed review procedure was based on procedures and staffing levels at the time.</li> <li>-The Department receives a number of enquiries where advice may be quite general in nature. The enquirer is invited to consult the guidelines and seek further advice if necessary.</li> </ul>

From	Comment	Response
	<p>departments that may need to carry out similar work in future.</p> <p><b>(3.)</b> Secondly, we are dismayed that officers seem to have ignored the guidelines in some cases in giving guidance or permission that is at odds with what is stated in the guidelines. This particularly affects finishes. We urge officers in the Department of the Built Environment with responsibility for giving advice on the Barbican Listed Buildings to carefully note Chamberlin Powell &amp; Bon’s choice of materials and finishes, as well as the currently approved paint colour palette. We believe that officers should carefully explain to all potential applicants for Listed Building Consent, especially other City departments, the importance of these materials and finishes and reject the introduction of alien ones including, for example, (unpainted) stainless steel [for bicycle racks], unpainted aluminium and unpainted galvanised iron [for stanchions for safety wires]. The piecemeal and not carefully thought through introduction of new materials will undermine the overall aims of the guidelines.</p> <p><b>(4.)</b> We look forward to the adoption of these revised Barbican Listed Building Management Guidelines as a Supplementary Planning Document and seek reassurances that the department responsible for policing the guidelines will itself observe them.</p>	<p>-Some enquiries are at a pre-application stage and are therefore confidential.</p> <p>In addition, many green category works may be undertaken without our knowledge as no consent is required. As these enquiries can be received by a number of different staff members, in different locations, it has not been possible or warranted to develop a mechanism for capturing the data.</p> <p>Whilst the Management Guidelines were approved by committee, the management of the service and the allocation of resources lies within the remit of Senior Officers, and would not be referred to Committee for approval.”</p> <p><b>(3.) Comment Noted</b> - A significant amount of work is being done to improve liaison between different departments of the City of London, and to ensure that all the necessary staff receive adequate training on the Listing of the Estate, the Management Guidelines, and how projects should be managed to ensure the correct consultation and procedures are followed. Some of the cited examples of incorrect materials are under on-going discussions with the relevant parties.</p> <p><b>(4.)</b> The Department of the Built Environment will continue to provide advice and guidance on the management guidelines to all residents, developers and CoL departments. Officers will continue to use the document to guide the decision making process, whilst balancing their use within Listed Building policy at a National and Local level.</p>

From	Comment	Response
<p><b>Natural England</b></p>	<p>Case name: Sustainability appraisal screening for the following Supplementary Planning Documents:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Barbican Listed Building Management Guidelines SPD</li> <li><input type="checkbox"/> Bow Lane Conservation Area Character Summary and Management Plan SPD</li> <li><input type="checkbox"/> Queen Street Conservation Area Character Summary and Management Strategy SPD</li> <li><input type="checkbox"/> Smithfield Conservation Area Character Summary and Management Strategy SPD</li> </ul> <p>Thank your consultation dated 28 May 2012. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development</p> <p>Sustainability Appraisal Screening</p> <p>For all of the above Supplementary Planning Documents (SPD), Natural England does not consider the SPD's potential impacts to be significant to the natural environment. The Corporation should however seek their own legal guidance on the application of the SEA Directive and take into account the responses of other statutory consultees at the screening stage, before making a decision on the requirement to prepare an SEA. SPD content</p> <p>Natural England have no comments to make regarding the Barbican Listed Building Management Guidelines SPD,</p>	<p><b>No Response Required</b></p>
<p><b>20<sup>th</sup> Century Society</b></p>	<p>Sorry for the delay in reviewing the Guidelines, and thank you for consulting us. We've now been through the documentation and have no additional comments to make</p>	<p><b>No Response Required</b></p>
<p><b>The Theatres</b></p>	<p>Thank you for your email of 28 May consulting The Theatres Trust on the</p>	<p><b>No Response Required</b></p>

From	Comment	Response
<b>Trust</b>	<p>Barbican Supplementary Planning Document for Management Guidelines regarding alterations and physical management of the residential elements of the Barbican Estate.</p> <p>As this consultation is not within our remit we have no comment to make, but look forward to being consulted on management guidelines for The Barbican Centre, which should exist to complement the residential element.</p>	
<b>Ms Gemma Jamieson</b>	<p>a listed grade 2 building. Care should be taken with any new building being built in the surrounding area/vicinity not to block the views, and light to be able to get to the Barbican. St Alphage House, what is happening to the building? If it is coming down, and another building being built in its place. The building to replace St Alphage House, should not be as tall as it is at the moment. What is happening to the shops and Bank which have been closed round that area? Are they going to be made into a garden area, to brighten up that part of the Barbican eg. Large tubs of flowers. Or are they being left unused.</p>	<p><b>Comment Noted</b> – This does not lie within the remit of the SPD. Any new development proposal that may affect the Barbican Estate will be considered according to City of London policies set out in the Local Plan</p>
<b>TfL</b>	<p>Thank you for the opportunity to comment on the above draft SPD's. Overall TfL has no objections to the document's content. Nevertheless TfL will need to be consulted for any applications/works proposed on or close to the Strategic Road Network and Transport for London Road Network, or any of its transport infrastructure.</p> <p>Regarding the Barbican Listed Building Management Guidelines SPD, TfL notes that the document intends to ensure a consistent graphic identity in the Barbican Estate's signage including the way finding system. TfL would like to see Legible London signs used in the City more widely, as well as around the Barbican specifically. TfL is aware that the City of London currently has its own signing system, nevertheless TfL request Legible London signs are considered as part of the wider way finding network in London.</p>	<p><b>Comment Noted</b></p>



From	Comment	Response
	<p>For your information, as part of the Legible London pilot programme back in 2008-10, TfL specifically trialled Legible London in areas considered to be more difficult, such as conservation or historic locations. Locations in central London such as Grosvenor Square saw signs introduced into designated conservation zones. In such places, TfL made additional efforts to run the plans past the relevant local authority officers, as well as groups such as English Heritage. In some cases, a higher quality of reinstatement was required, but no signs were turned down for installation.</p> <p>If you have any questions please get in touch.</p>	
<p><b>Paul Drury Associates</b></p>	<p>Many thanks for notifying us of this consultation. None of these documents affect the interests of our clients, Historic Royal Palaces, so we will not be submitting comments.</p>	<p><b>No Response Required</b></p>
<p><b>City of London Archaeological Trust</b></p>	<p>We have no comment on the Barbican Listed Building Management Guidelines.</p>	<p><b>No Response Required</b></p>
<p><b>Environment Agency</b></p>	<p>We have no comments to make on the following SPD's</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> Barbican Listed Building Management Guidelines SPD</li> <li>• <input type="checkbox"/> Bow Lane Conservation Area Character Summary and Management Strategy SPD</li> <li>• <input type="checkbox"/> Queen Street Conservation Area Character Summary and Management Strategy SPD</li> <li>• <input type="checkbox"/> Smithfield Conservation Area Character Summary and Management Strategy SPD</li> </ul> <p>Kind Regards</p>	<p><b>No Response Required</b></p>

From	Comment	Response
	<p>Matthew Arthur Planning Officer - North London</p>	
<p><b>Highways Agency</b></p>	<p>Thank you for your letter dated 28 May 2012 inviting the Highways Agency (HA) to comment on the City of London Supplementary Planning Documents Consultation.</p> <p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport.</p> <p>The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>We have reviewed the consultation and do not have any comment at this time.</p>	<p><b>No Response Required</b></p>
<p><b>Showmans Guild</b></p>	<p>Thank you for your letter dated 28th May 2012, received via email attachment.</p> <p>Whilst we appreciate being included in these consultations, we feel that the areas referred to in your letter, would not be considered as being appropriate to the needs of the Showmens Guild.</p> <p>We thank you once again for the opportunity to take part.</p>	<p><b>No Response Required</b></p>
<p><b>Great Portland Estates</b></p>	<p>Thank you for your email. At this time, Neil does not have any views on the document.</p>	<p><b>No Response Required</b></p>

From	Comment	Response
<p><b>Greater London Authority</b></p>	<p>I refer to your letter of 28 May 2012 consulting the Mayor of London on the above draft documents. The Mayor has afforded me delegated authority to make comments on his behalf on draft supplementary planning documents.</p> <p>As you are aware all local development documents including supplementary planning documents have to be in general conformity with the London Plan under Section 24(1)(b) of the Planning and Compulsory Purchase Act 2004.</p> <p>I have assessed the details of the draft documents and have concluded that they address local matters which are properly dealt with by the local planning authority. As such they do not raise any strategic planning issues and we have no formal comments to make</p>	<p><b>No Response Required</b></p>
<p><b>PMSA</b></p>	<p>Thank you for providing the PMSA with the opportunity to contribute to the debate.</p> <p>The PMSA aims to heighten public appreciation of Britain's public sculpture, and to contribute to its preservation, protection and promotion. It seeks to achieve this through several projects that include: the National Recording Project, the Sculpture Journal, Save our Sculpture and the Marsh Award for Public Sculpture.</p> <p>Some 70% of the nation's sculpture available to the public has been catalogued as part of the National Recording Project. As the most easily accessible open air gallery Britain's public sculpture has developed its own unique heritage. There are several strands of interest that the PMSA would like to see within Council policies and these relate to the life cycle of any item. A set of policies were developed last year by the Trustees and we would recommend them to you for consideration within your current work.</p> <p>"In considering development proposals via a planning application existing</p>	<p><b>No Response Required</b></p>

From	Comment	Response
	<p>public monuments and sculptures should be preserved on their original or an adjacent site. Older monuments should be retained and used as a focus for the area's historical heritage.</p> <p>If the monument or sculpture needs to be moved it should be subject to specific conditions regarding its location, movement , reinstallation, and with due consideration to its artistic impact so that it becomes an important fixture in new community development, whether commercial or residential. Costs of movement should fall to the developer. Conditions should also be imposed regarding any movement to ensure there is no damage to the structure.</p> <p>Exceptions could be made in certain circumstances where after independent consultation with specialists the monument is found to be unsafe, non repairable, could not sustain a move or would be incongruous with the proposed development. In such circumstances reference should be made to the PMSA for advice on its future.</p> <p>New public sculpture, monuments, fountains, statues may be suggested either by a developer, the community, or the local council, in these instances the planning authority shall ensure that the proposed site is recorded and full details submitted to the UK national database managed by the PMSA.</p> <p>The council shall have a requirement to inform the PMSA of all movements to monuments and to ensure their condition is maintained.</p> <p>The council shall also have a requirement to put in place an anti theft regime</p> <p>based on advice provided by the organisation Alliance to Reduce Crime Against Heritage ARCH</p> <p>The council shall also stimulate the promotion of new public sculpture in major new developments and ensure that there is a plan for its protection and conservation. “</p> <p>We trust that this response may be of assistance to you in developing future proposals but please contact us should you need more information</p>	

From	Comment	Response
	or clarification.	