## **City of London**

## **Supplementary Planning Documents**

Fleet Street Conservation Area Whitefriars Conservation Area Chancery Lane Conservation Area

## **Appendix B - Consultation Statement**

February 2016



The Fleet Street, Whitefriars and Chancery Lane Conservation Areas Supplementary Planning Documents (SPD) were published in draft for public consultation during a ten week period from 29<sup>th</sup> October 2015 to 8<sup>th</sup> January 2016. Prior to the public consultation the drafts were prepared by officers in the Department of the Built Environment in consultation with colleagues in that and other departments within the City of London Corporation and the text was approved by the Planning and Transportation Committee.

Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 require the City Corporation to prepare a consultation statement setting out the persons consulted when preparing a supplementary planning document, a summary of the main issues raised by those persons and how these have been addressed in the SPD.

The following measures were taken to consult the public on the SPDs during the consultation period:

**Website.** The draft SPDs and supporting documents were made available on the City Corporation's website. 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. Information was provided in the City of London e-shot.

**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, Artizan Street and Shoe Lane public libraries.

**Notifications**. Letters and emails containing information about the draft 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 planning policy, and letters or emails were also sent to all those on the list.

**Posters and leaflets** advertising the Conservation Area SPDs consultation and inviting comments were placed in the Guildhall, Barbican, Artizan Street and Shoe Lane public libraries.

**Meetings**. Presentations on the SPDs were given to the Conservation Area Advisory Committee.

The planned preparation of the draft SPDs was posted in the Local Plan Bulletin and on the Consultations page of the City of London website. Members of the public were invited to make comments to contribute to the preparation of the draft SPDs. No such comments were received.

Responses to the consultation were received from the City of London Archaeological Trust (CoLAT), Natural England, Transport for London, Tideway, the Port of London Authority, Historic England and the City of London Conservation Area Advisory Committee.

The table that follows summarises the comments and explains how they were addressed in finalising the SPDs.

## Summary of comments and responses – minor amendments to deal with typos/errors in the comments will be made in the final documents

CA SPD	Comment	Response
	City of London Archaeological Trust	
All	"Chancery Lane: p13 Staple Inn: your earliest date of 1529 is when the legal inn was purchased by Grays Inn. It would be preferable to say 'with Staple Inn, a legal inn of some antiquity, having its surviving hall and street frontage of the 1580s in place; no doubt it had medieval buildings.' [we look forward to being consulted on the forthcoming City Public Realm SPD of 2016, mentioned on p42]	The consultee's advice will be incorporated.
	Fleet Street: p12 last paragraph: in this and the Whitefriars SPD, be consistent about the date of foundation of the Whitefriars. The generally accepted date is 1241 (see Harben's <i>Dictionary of London</i> or the collected essays from VCH published in 2007). p15 second paragraph: not Farringdon Street but New Bridge Street surely.	
	Whitefriars: p12 line 6: perhaps omit 'and prison'; it wasn't a prison in the normal sense. And on p14: perhaps 'the workhouse' rather than 'the prison.' It is more generally known as Bridewell Hospital (for instance in the Pevsner description of the gatehouse you mention). p45 archaeological potential: we are not aware of any <i>medieval</i> remains of Bridewell Palace, which would be unlikely as the palace of 1515 was a combination of acquired secular properties and land reclamation. Just have 'Postmedieval remains of Bridewell Palace' or, since the term post-medieval is not widely understood, have 'Remains of Bridewell Palace, 1515 and later."'	

	Natural England	
All	"Natural England does not consider that the Chancery Lane Conservation	No action required
	Area Character Summary and Management Strategy Fleet Street	
	Conservation Area Character Summary and Management Strategy White	
	friars Conservation Area Character Summary and Management Strategy	
	pose any likely risk or opportunity in relation to our statutory purpose, and	
	so does not wish to comment on these consultations."	
	Transport for London	
Fleet Street &	"The respective policies should make reference to Transport for London Road Network (TLRN) which intersect both conservation areas at Blackfriars Bridge, Victoria	The consultee's advice will be incorporated; for the exact wording please see Appendix C.
White	Embankment, Farringdon Road and Ludgate Circus.	
friars	Furthermore these areas will be served by the North South Cycle Superhighway and East West Cycle Superhighway, when they open to the public in 2016, which is recognised in the policy documents.	
	The policy documents should also make reference to the requirement for TfL consultation on any proposed public realm or streetscape enhancement that may impact upon the TLRN or cycle superhighway corridor. TfL will review the proposals with a view to ensuring that the proposals accord with TfL's Streetscape Guidance and do not adversely impact upon the TLRN.	
	With respect to tree removal, TfL requests that text is included to note that TfL does not support the removal of trees from its TLRN corridor and TfL approval is required prior to any tree pruning, removal or development that may impact adversely upon TfL trees."	
	Tideway	

White friars	Tideway is pleased to see the forthcoming Thames Tideway Tunnel described in the character analysis of the Victoria Embankment (page 20) and recognised as creating a new area of public open space within the Whitefriars Conservation Area (page 44).	The consultee's advice will be incorporated; for exact wording please refer to Appendix C.
	It should be noted that the HMS President, referred to positively in the character analysis for the Victoria Embankment (page 22), will be removed by the owner for the duration of the Thames Tideway Tunnel construction works at Blackfriars Bridge Foreshore.	
	Port of London Authority	
White friars	"The PLA notes the boundary of Whitefriars Conservation Area. Given that a significant proportion of the conservation area includes the River Thames it is surprising that the SPD makes very few references to the river.	The consultee's advice will be incorporated; for exact wording please refer to Appendix C.
	For example under "Land uses and related activity" there is no reference to the uses of the River Thames which include the transport of passengers to and from Blackfriars Pier and the transport of freight along the River.	
	The Management Strategy also under "Transport" makes no reference to the River and the role it plays in encouraging travel by sustainable modes."	
	Historic England	

ΑII

"The conservation area boundary maps might benefit from the inclusion of labelling for bordering conservation areas, for reference. Particularly, if a bordering area is mentioned in the text as affecting the setting of the conservation area in question (eg. The area to the north of Chancery Lane Conservation Area)

It may be helpful to add a further map illustrating which buildings in the conservation area provide a positive, negative or neutral contribution to the character of the area. The Royal Borough of Kensington and Chelsea has produced excellent examples of this kind of spatial analysis in their new draft Conservation Area Appraisal Documents (<a href="https://www.rbkc.gov.uk/planning-and-building-control/heritage-and-conservation/conservation-areas

The Corporation could also usefully add to these documents by including a brief explanation of how it will use its enforcement powers to protect the area. This is particularly relevant for the sensitive parts of the conservation areas affected by unsympathetic alterations. It would also be helpful to highlight any Article 4 Directions (if relevant) which the Corporation has adopted for the conservation areas that reduce any permitted development rights in the interests of protecting the character of the area

The Corporation could also identify opportunities for enhancement projects that it may be considering, for example the City's Area Enhancement Strategies for both Chancery Lane and Fleet Street set out a vision for public realm improvements. Identification of particular elements requiring enhancement , such as the railings on the south side of Tudor Street (No.21) in the Whitefriars Conservation Area) could , in due course, prove useful for allocating funds or opportunities to public realm projects received from S106/Community Infrastructure Levy payments.

. Cont overleaf

CoL response:

The City does this to ensure focus on the conservation area. The text describing the boundary will be extended to more fully describe neighbouring heritage assets.

The character analysis section sets out the characteristics of individual buildings and groups of buildings. This recognises that buildings have different attributes that contribute differently to the conservation area character. No amendment therefore required.

Section (19) Enforcement contains a brief paragraph on the approach taken by the City. Breaches of planning control are investigated in accordance with CoL Planning Enforcement Service Standards. There are currently no article 4 directions in the City. No amendment therefore required.

Aspects of the CAs that would benefit from enhancement, repair or renewal are mentioned in section (6) Character analysis. CoL-undertaken enhancement projects are mentioned in section (15) Environmental Enhancement; where future schemes are known these are mentioned. Where appropriate, S106/CIL monies may be identified to enhance elements of the conservation area. No amendment therefore required.

We are very pleased to see the potentially significant effect of future Noted. Thames Tideway Tunnel foreshore development has been mentioned in the text, and encourage The City to stress the important role that the Historic Environment can play in informing the design of public realm. Detailed landscaping for the project is being developed in consultation with the City and as such this should represent an opportunity to ensure that proposals can enhance the wider historic environment (the single point of contact fro the project is Ted Rayment who should be consulted on the relevant comments). Also, we welcome the inclusion of archaeology in each of the documents, as it remains an important consideration in all development proposals in the City. Please note that the Greater London Archaeology Advisory Service (GLAAS) is currently in the process of reviewing Archaeological Priority Areas across London, and these may include areas bordering the City and its conservation areas. Finally, so as to assist the public, developers and decision makers Noted – the link is provided the Bibliography. respond to pressures to reduce energy usage and carbon emissions, as well as requirements in the Building Regulations and sustainable building codes, you could consider including in your Management Strategy a discussion of any conservation impacts that may need to be managed in relation to energy-saving and renewable energy measures. We have produced a web resource that may be a useful point of reference: https://historicengland.org.uk/advice/your-home/savingenergy/.

**CoL Conservation Area Advisory Committee** 

All "1. Fleet Street conservation area character summary.

The history section is well written and informative. Similarly the character analyses of the streets and buildings brings alive the context. It encourages a walk around the conservation area to appreciate the buildings referred to.

The committee wishes to support the adoption of this document.

2. Chancery lane conservation area character summary.

Again, the history and character analyses is well put together. We think there might be a minor typo on page 21 penultimate paragraph commencing "Deep window revels......". There is something not quite right in the first sentence.

Another small typo on the second line of page 28. Merely requires a space to be inserted. On page 35 there is a reference to 14-18 Holborn where "discordancy is created by the wholly glazed section of ground floor frontage at 14-18 Holborn, which forms an uncomfortable contrast with the traditional public house frontage that occupies the other part of the ground floor." We entirely agree with this statement. Even though the building is modern we do support retention of the attractive pub frontage as against the wholly glazed section.

On page 41 we wonder whether the 3<sup>rd</sup> paragraph might be superfluous as the Local Plan is now adopted?

On page 48 is the map showing designated heritage assets. The colouring for 337 and 338 appears to indicate grade 1 rather than grade II\*? I am not sure the obelisk marking the City Boundary is shown? In the Fleet Street appendix there is a small inset diagram and perhaps something similar is called for here?

The committee wishes to support the adoption of this document.

3. Whitefriars conservation area character summary.

Once more, a well written and informative document.

The character analyses on page 20 rightly includes Hamilton House as a Victoria Embankment building.

However, on page 49 it is identified as 1 Temple Avenue. The listing for this building specifies it is Victoria Embankment but includes 1 Temple Avenue. Perhaps this should be reflected in the Appendix? The committee wishes to support the adoption of this document.

All 3 documents are well put together.

The consultee's advice will be incorporated into the SPDs. There is discordancy in the listings and addresses for the Holborn range of Staple Inn, which is in fact grade I, reflected by the present map.