

City of London

Supplementary Planning Documents

Appendix 1 - Consultation Statement

July 2017



The Introduction to the Historic Environment Strategy, the Archaeology Guidance SPD and the Churchyard Statements were published in draft for public consultation during a ten week period from 29th October 2015 to 8th 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 and evidence bases during the consultation period:

Website. The draft SPD and evidence base 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 SPD and the evidence base documents were 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 SPD and other documents 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.

Leaflets advertising the draft SPD and evidence base documents consultation and inviting comments were placed in the Guildhall, Barbican, Artizan Street and Shoe Lane public libraries.

Meetings. Presentations on the Historic Environment Strategy 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

Doc	Comment	Response
	<p>City of London Archaeological Trust</p>	
All	<p>Archaeology and Development Guidance SPD</p> <p>This is the latest edition of a set of procedures which have been developed by the City over the last three decades. As an example of procedures to manage how archaeology fits into the development process, it is a model for other cities in Europe and further afield. The City should be congratulated on the statement of these procedures. All the procedures concerning archaeology however need constant vigilance by the Corporation’s officers if they are to be observed by developers (secular or religious). We perceive that the front end of archaeological projects, how the access to sites is managed and the excavations, together with immediate post-excavation work, is in general well done by archaeological contractors and regulated by the Corporation. We recommend that the Corporation puts equal effort into ensuring that developers do their duty in funding publication beyond the writing of the post-excavation assessment which is sometimes erroneously thought of as the final report; as required by this SPD on p.30 and national legislation.</p> <p>As this text is a version which has grown over the years, there are some out of date references which should be changed. Here are a few:</p> <ol style="list-style-type: none"> 1. p.25: surely the reference to 35mm film is now out of date. 2. p.25: LAARC now has a new name, The Museum of London Archaeological Archive (and see refernece on p.26). 3. p.25: Museum of London Specialist Services disappeared several years ago. If you are to retain this sentence, put MOLA; but it may be inappropriate now to say this. 	<ol style="list-style-type: none"> 1. <i>Photographic standards have been updated</i> 2. <i>‘LAARC’ has been changed to the ‘Museum of London Archaeological Archive’ throughout the document</i> 3. <i>‘Museum of London Specialist Services’ has been altered to ‘Museum of London Archaeology’</i>

	CoLAT (continued)	
All	<p>City Churchyards Statements of Significance</p> <p>These are excellent.</p> <p>1. General point: consideration should be given to laying out the outline for parts of parish churches which lie beneath their present churchyards. The extent to which all the churchyards you catalogue can do this could be ascertained. It would be only a few, but it would make the churchyards even more interesting and would constitute a form of memory which is very rare in the City today.</p> <p>2. Points of historical accuracy:</p> <p>All Hallows by the Tower: in the archaeology paragraph, the 3rd century date is surely wrong and from something else, perhaps the nearby City wall. The church is 11th-century, as you state above.</p> <p>St Bartholomew the Great, archaeology: strictly speaking the excavation of 1987 was not in this area but on the north-east side of the church, where the parish building is now. Amend your sentence, but keep it in.</p> <p>St Benet Fink: the Wren church was decagonal, not octagonal. Perhaps add to the archaeological potential: 'The remains of a Wren church of unique plan could be significant.' St Botolph Aldersgate: add to the archaeological potential that the Roman and medieval City wall borders the site on the south side, and fragments may survive (explaining your reference to the SAM).</p> <p>St Magnus the Martyr: was in existence by the 11th century, not the 12th. Instead of '(cartographical error?)', put '(from the 12th century to 1666, from excavations of the 1970s)'. This is detailed in your Archaeology paragraph for the church.</p> <p>St Mary le Bow: please add to the Archaeology paragraph that the west end of a vaulted undercroft built shortly after 1276 was recorded immediately west of the tower in 1959 (Grimes).</p>	<i>The suggested amendments have been incorporated into the text</i>
	Transport for London	
All	<p>Thank you for consulting Transport for London (TfL) on the Historic Environment Strategy and Enforcement Plan. TfL has no comments on these documents.</p>	No response required

	CgMs – (part of RPS Group)	
Archaeology Guidance	<p>Please see below the comments to the consultation on Historic Environment Strategy from the archaeology team at CgMs (part of RPS Group).</p> <p>The CgMS (Part of RPS) comments for CoL area as follows:</p> <ol style="list-style-type: none"> 1 It would be beneficial if there is guidance on how Roman developments in the City are assessed for significance 2 There is much emphasis on preservation in-situ, but is this a hangover from PPG16, given that it is significance that is now paramount? 3 The approach to outreach has no NPPF backing and might be considered an area of blurred lines 4 There should be a need to require CMIfA membership as RO# 	<p>1. The policy section on pages 5&6, identifies the national (NPPF), regional (London Plan) and local (Local Plan) policy context for the assessment of significance of designated heritage assets. Paragraphs from the NPPF on the assessment of undesignated heritage assets will be added.</p> <p>A further document characterising the city's archaeological and historic past is in preparation, and will provide a greater degree of information regarding the Roman period.</p> <p>2. Where there is potential for archaeological remains of significance, preservation in-situ is a consideration. Reference to preservation in-situ has been cited where it is considered relevant; however the assessment of significance and archaeological potential of the site is considered in the policy context and impact assessment sections of the document. Several alterations to the text to further emphasise the assessment of significance have been added in response to this comment.</p> <p>3. Paragraph 141 of the NPPF directs LPAs and developers to both gather and disseminate information about the Historic Environment. Policy DM 12.4 paragraph 3.12.21 of the City of London Local Plan concerns the interpretation and presentation to public of visible or buried remains. It says the 'agreement will be sought, where appropriate, to achieved reasonable public access'. This provides sufficient backing for the guidance outlines in the document.</p> <p>4. The City of London follows current standards and guidelines for staffing and organisations, but is unable to make Clfa membership a requirement for organisations undertaking work in the City of London.</p>

	Natural England	
All	<p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p>	No response required.
	Historic England	
All	<p><i>Heritage Environment Strategy</i></p> <p>Historic England welcomes the production of a Heritage Environmental Strategy. In our view, the component elements identified for inclusion within the Strategy will contribute positively to a solid framework for the management of the historic environment through drawing together relevant guidance and advice.</p> <p>The introduction refers to a number of topics including <i>Understanding the Historic Environment</i>, a <i>Structure of the Historic Environment SPD</i>, and <i>Managing Change and the Historic Environment</i>. You have confirmed that a number of the topics set out in the introduction have yet to be produced, or exist but will be extensively revised. It would therefore be helpful to clearly signpost this in the introduction document.</p> <p>Additionally it is not clear how and where the policy advice and guidance in respect designated heritage and undesignated heritage assets will sit within the proposed structure.</p> <p>It would be helpful to expand the Structure of the Historic Environment section and put this before the introduction as it effectively serves as the key to the document. Alternatively a title page with chapter headings prior to the text could be introduced.</p> <p>Historic England acknowledges that Heritage Strategies can follow a number of bespoke forms. In our view these can usefully :</p> <ul style="list-style-type: none"> • increase awareness and reinforce messages about the importance of heritage to a place; 	<p>The Introduction will be revised to provide greater clarity as regards the content and structure of the Historic Environment Strategy as a whole.</p> <p>A new document is proposed, called the 'Historic Environment SPD' will provide an overarching management strategy for the City's Historic Environment. It will include national and local policy context, guidance and case studies.</p> <p>This has been actioned</p>

<p>All</p>	<p>Historic England Continued...</p> <ul style="list-style-type: none"> • place heritage as a key component of a development strategy; • set out how the City can work collaboratively in gathering evidence, sharing best practices and developing new tools celebrating the value the City London's heritage; • identify strategic heritage priorities and policy directions for the successful management of challenging pan-London issues such as, managing the setting of World Heritage Sites, appropriate location of tall buildings, delivery of growth in strategic locations; <p>provide a framework for monitoring good heritage management and promoting its successes</p> <p>With these in mind it would be potentially very useful to develop the overall structure of the document within the context of a vision for the historic environment and set within the introduction out how the component documents will better achieve this, whilst identifying potential gaps and opportunities to achieve these aims.</p> <p>Archaeology and Development Guidance This document sets out the City of London's commitment to valuing its rich archaeological heritage and protecting it via the planning system, through excavation, recording, archiving and publication (and other dissemination) where preservation in situ is not deemed appropriate or necessary. All relevant legislation and guidance is clearly identified and acknowledged in reference to both designated and undesignated archaeology, including guarding against the possibility of the future discovery of nationally important archaeology. The standards and guidance section is clear and well set out and provides significant levels of clear information for planners, developers and archaeologists (it would be helpful if GLSMR could be changed to GLHER in the few places where this hasn't happened yet)</p> <p>A minor point, of academic, rather than strategic relevance is that the document, when referring to the archaeology of the City, does not refer to the possibility of prehistoric occupation, which is certainly a published hypothesis with some credence. Instead, the focus is solely on the archaeology from the Roman invasion.</p>	<p>It is intended that the new structure of the Introduction, with the later addition of the Historic Environment SPD as a separate document, will achieve this.</p> <p>'GLSMR' has been changed to 'GLHER' throughout the document</p> <p>Some amendments have been made in the text to reflect earlier evidence prior to Roman occupation</p>
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	<p>Archaeology and Development Guidance SEA Screening Assessment I can confirm that Historic England agrees with the City of London's screening assessment that the document <u>does not</u> have potential impacts on significance which require SEA.</p> <p>Churchyard Statements of Significance The Statements of Significance provide a valuable audit of the relevant elements of historic and archaeological significance of the City Churchyards. These are exceptionally thorough and well laid out with the appropriate links to relevant legislation and advice. As such we would consider the resource to be a valuable tool for the management of these important heritage assets. We would support the integration of this resource into existing evidence bases and consideration of how the document will integrate with the wider aims of the Historic Environment Strategy to ensure that is accessible and used as a tool for understanding significance when planning for works, maintenance, or gathering historic evidence.</p>	
	<p>St Nicholas Cole Abbey</p>	
	<p>Thank you very much for your work on the City of London Local Plan. It's great to see that the City is aiming to preserve its status as a cultural and commercial hub.</p> <p>On behalf of St Nicholas Cole Abbey, where I am the administrator, I wanted to point out one addition and one mistake on our entry in the CoL Development Division Churchyard Statements September 2016.</p> <p>The addition is that of the lower portion of our churchyard. While our 'raised' churchyard has been accurately recorded, the lower portion (photograph and land registry document attached) seems to have been omitted. It has certainly been omitted from the physical description of our churchyard.</p> <p>The mistake is that while the omitted lower area of our churchyard is maintained by the City, the raised area which currently features on the document is not.</p>	<p><i>Amendment made to document in response</i></p>

	<p>Diocese of London</p>	
<p>All</p>	<p>Very few places in this country, perhaps on this planet have the density of listed churches and churchyards, within one square mile, and the large patterns of activity that go with that estate. Managing those heritage assets, places of worship and community centres, which what they all are is challenging and rewarding and I am grateful for our partnership with the City of London Corporation as we attempt to serve our communities.</p> <p>It is particularly pleasing to see the work done on the statements of significance for the City Churchyards. This is a vital piece of work that allows us all to plan the future sensitively and appropriately. Joint structures are already in place to take some of this work forward as we all look to safeguard and protect these important places.</p> <p>Without wishing to take anything away from the work done, which we welcome, we would wish to offer a small number of comments and reflections.</p> <p>Cumulative Impact of wider development and Intensity of location specific development</p> <p>The Historic Environment in the City, in particular churches and churchyards are threatened by the level of development and its intensity. Ever taller buildings, closer together, are blocking light to churches and churchyards, making them less attractive to visit, less safe, harder to maintain, and impacting on the bio-diversity in our open spaces. The strategy does not seem to reference external factors affecting the historic environment. It sometimes feels that the historic environment of the City is ‘problematic’ to wider development rather than an opportunity to enhance the wider environment.</p> <p>Sustainability of Historic Environment and he changing nature of public realm</p> <p>With increasing numbers of workers, residents, visitors and buildings, our historic environment is under pressure. Our green spaces are well used and new ‘open space’ tends to be ‘concrete’ rather than green, and it is often private rather than public. This is regrettable. The size of the City may be one square mile, but the increasing use, achieved with higher densities is not seeing a similar increase in churches and churchyards (amongst other things) that can</p>	<p>It is proposed to develop a separate document ‘Historic Environment SPD which will clarify the policy context, and the approach that the City of London expects to be taken in managing the Historic Environment. This will include case studies.</p> <p>Open spaces, their creation, management and treatment in the context of the historic environment will be discuss in the Historic Environment SPD document.</p>

Diocese of London Continued...

cope with increased numbers and different types of use. The recent 'Future City' report did recommend better use of outdoor space to facilitate business and create better working environments if the City of London is to retain its pre-eminent position in the European and World Financial Markets. It would be pleasing if this were reflected in the strategy at present.

Animation of Heritage Assets

In line with the changing nature of public realm there needs to be a realisation that the historic city needs animating – and animating appropriately. Better interpretation, lighting, planting, signage, education (especially with archaeology), seating, WiFi, bins and in some places trading. Again these were recommendations from Future City and all are regularly mentioned in community consultations. Although work has started on this, we believe more could be done through innovative partnerships.

Consultation

We are grateful for the opportunity to respond to this current consultation. It is a matter of great regret that the same level of engagement with the church does not always take place over similar strategies, such as tall buildings. There is much we can contribute to those wider discussions. It is important to note that the Church does not think in 'economic life cycles' but rather in centuries and our unique insights may be beneficial as we partner in ensuring our great City continues to flourish.

Notwithstanding these comments, we welcome the strategy and look forward to working together to protect and enhance the heritage of our great City.

An interpretation strategy for the historic environment is in preparation.

	<p>St Helens Bishopsgate</p>	
	<p>I am writing on behalf of the Parochial Church Council of St Helen Bishopsgate (“the PCC) who are responsible for the churchyards of St Helen Bishopsgate and St Andrew Undershaft. The PCC wishes to make a late representation on the statements of significance of these two churchyards, which were subject to public consultation at the end of 2016.</p> <p>It is clear that a lot of work has gone into the preparation of these documents and we believe that they will be a useful source of information in the years to come and commend the City for undertaking this project. We hope that you will be able to consider our comments as you finalised the statements of significance. Our comments are mainly concerned with statements made in the documents which we believe are factually incorrect.</p> <p>Please note that although we have received these statements of significance, this representation is not intended to imply endorsement of material contained within the documents.</p> <p>St Andrew Undershaft</p> <p>In the ‘Access’ column of the ‘Physical Context’ table, the document states “level to church, no level access to churchyard locked at night.” We make the following observations: there is no level access into the churchyard as there is a small threshold step from the pavement into the churchyard. The document states that there are two seats, but there are actually three. The document also states that there is a tree in the churchyard, which there is not.</p> <p>Under the heading ‘Significance’, the document states that “access to the upper section may be possible through the church, which was reordered between 2011 and 2013.” We are not sure what you are intending to communicate here. It is correct that access into the church is possible, but there is no level access into the church from the churchyard.</p>	<p><i>Amendments made to relevant entries to reflect these observations</i></p>

	<p>St Helen Bishopsgate</p> <p>Under the heading 'Physical Description', the document states that "the rest of the churchyard is paved with newer York stone of a different hue and texture." This is incorrect; the rest of the churchyard is paved with unpolished Purbeck marble. The document states that "the sculpture 'Broken Pillar' by Shan Hur was installed as part of the City's Eastern Cluster Arts initiative." This is correct although we wonder if this is the most helpful thing to say in a document that is likely to be referred to for several years to come, given the artwork installation is only temporary and will be removed shortly. We suggest that it may be more helpful to say "the churchyard currently hosts – and has previously hosted – pieces of artwork as part of the City's Eastern Cluster Arts initiative."</p>	
	<p>St Paul's Cathedral</p>	
<p>All</p>	<p>Annotations to entry on St Paul's Cathedral:</p> <p>General 'A map of what we are defining as the 'precinct' for St Paul's would be essential, given the historical context and the differing ownerships. We have slightly different terminology for areas of the precincts.'</p> <p>Statutory designations</p> <ul style="list-style-type: none"> - 'Other designations also: Care of Cathedral Measure, St Paul's Depths, West Front Lamp standards have recently been listed' <p>Structures</p> <ul style="list-style-type: none"> - 'Note that strictly speaking what we know as the 'cross' is a memorial or monument to the St Paul's Cross' <p>Physical description</p> <ul style="list-style-type: none"> - Line 2 'and north' - Line 10 'is it actually Purbeck?' - Line 12 'designed by Lutyens' (referring to the portico) <p>History</p> <ul style="list-style-type: none"> - Last line, 3rd paragraph 'and judicial book burnings.' - 3rd line, 6th paragraph '1712 or 1714?' - 6th line, 6th paragraph 'The line of the railings and churchyard boundary has been entirely altered – see map regression on Heritage Statement 2011' 	

St Paul's Cathedral Continued...

References

- 'Also Schfield. J – Two volumes on Cathedral Archaeology (Before and After Wren)'

General response to Historic Environment Strategy consultation

I write on behalf of the Chapter of the Cathedral Church of St Paul in London (hereafter 'Chapter'). Chapter warmly welcomes the opportunity to provide input on the documents published for consultation; which are proposed to form part of the City's Historic Environment Strategy. We are pleased to note from your website that you may be able to accept responses beyond the 12 December 2016 deadline, and so provide our feedback below:

Very few places in this country have the density of listed churches and churchyards, within one square mile, and the large patterns of activity and opportunities for spiritual nourishment that go with that built and cultural estate. Managing those heritage assets, places of worship and community centres, is both challenging and rewarding. Chapter is grateful for our partnership with the City of London Corporation as we attempt to serve these communities, which come from the City, Nation and World.

It is particularly pleasing to see the work done on the Statements of Significance for the City Churchyards. This is a vital piece of work that allows us all to plan the future, sensitively and appropriately. Joint governance structures, through the Programme Board for Churchyards, are already in place to take some of this work forward as we all look to safeguard and protect these important places. St Paul's welcomes the partnership with the Diocese and looks forward to working with the City on the wider programme and the specific proposals for the further enhancement and development of the Cathedral's precinct and churchyard.

We have attached a mark up of the summary statement for the St Paul's Churchyard, which we hope will be of assistance. You have already referenced the 2011 Heritage Statement prepared by the Cathedral and we would welcome further discussion on that document. We are in the process of further updating

These annotations have been integrated into the text

This general response closely follows the submission made by the Diocese above. Accordingly, our response to them applies here.

St Paul's Cathedral Continued...

the heritage statement. We hope it will be possible to adopt the report as an authoritative resource. We would further welcome, through the churchyard programme, the creation of a management plan for the precinct and churchyard, including the newly clarified ownerships of land to the North and West of the Cathedral.

Accessibility to the historic environment:

We would make a specific observation about the strong desire to improve equal access and facilities for all within Churchyards and public open spaces of the City – which we feel might be more explicitly supported in the strategy. For example, in relation to Churchyards, making sure they are an accessible environment for all, including visually impaired and those with learning/cognitive disabilities or mental illness.

There is a more general observation which follows on from this specific point. We recognise the need for improved accessibility to the historic environment and the consequent necessity of 'managed change' which can facilitate more equal enjoyment of the rich cultural resources of the City.

Cumulative Impact of wider development and Intensity of location specific development

We agree with the Diocese in their representation that the Historic Environment in the City, in particular churches, churchyards and St Paul's can be threatened by the level of new development and its intensity. Ever taller buildings, closer together, are blocking light to churches and churchyards, making them less attractive to visit, less safe, harder to maintain, impacting on the bio-diversity in our open spaces and less uniquely and apparently distinctive with the City (whether read as part of the public realm or the wider skyline of London, which is an especial issue with St Paul's). Whilst the environment directly around the Cathedral is well protected in the main, there are local and more general views and setting of the Cathedral which are impacted by developments. This can be felt not just around St Paul's but also our Amen Court property, which is a rare survival.

The Historic Environment strategy does not seem to reference external factors affecting the historic environment. It sometimes feels that the historic environment of the City is 'problematic' to wider development rather than as a resource with opportunities to enhance this environment for the common good.

It is proposed to develop a separate document 'Historic Environment SPD which will clarify the policy context, and the approach that the City of London expects to be taken in managing the Historic Environment. This will include case studies.

St Paul's Cathedral Continued...

Sustainability of Historic Environment and the changing nature of public realm

Chapter also recognises that with increasing numbers of workers, residents, visitors and buildings, our historic environment is under pressure. Our green spaces are well used and this especially applies to the public realm around the Cathedral and our churchyard. The size of the City is fixed as one square mile, but with intensifying use achieved with higher densities, there is now a commensurate increase in the pressure on churchyards and open space (amongst other things) that cannot easily cope with unmanaged intensification. The recent 'Future City' report did recommend better use of outdoor space to facilitate business and create enhanced working environments if the City of London is to retain its pre-eminent position in the European and World Financial Markets. It would be pleasing if this were reflected as both an issue and an opportunity in the historic environment strategy. We recognise that these open spaces can work harder and better for the public good, provided there are the resources to manage the spaces well and to equip them to serve new pressures.

We specifically find that the public realm around St Paul's is under pressure and we have sought to assist the City with understanding these pressures through our work with Space Syntax. It is vital that there is a good evidence base for making decisions not just about the historic context but also with how the public interact with these places. We therefore hope that the Historic Environment Strategy can also more broadly engage with pressures of people, vehicles, environmental pollution and behaviour.

For example the way open spaces are used by smokers can be detrimental; on the other hand the wider use of open space for education and public engagement, for spiritual nourishment, calm and wellbeing, would be welcome – including sensitive commercial use of open space that will help to support and sustain upkeep.

Open spaces, their creation, management and treatment in the context of the historic environment will be discussed in the Historic Environment SPD document.

St Paul's Cathedral Continued...

Animation of Heritage Assets

In line with the changing nature of public realm there needs to be a realisation that the historic city needs animating – and animating appropriately. Better interpretation, lighting, planting, signage, education (especially with reference to the unseen history and archaeology and the City), seating, WiFi, bins and in some places trading. Again these were recommendations from Future City and all are regularly mentioned in community consultations. Although work has started on this, Chapter concurs that more could be done through innovative partnerships. We are also very pleased to learn of the City-wide lighting strategy, which has a key role to play in revealing and balancing the characteristics of open space – with the correct emphasis, balance and accent on key features, buildings and places.

Consultation

We are grateful for the opportunity to respond to this current consultation. It is a matter of regret that the same level of engagement with the church does not always take place over similar strategies, such as tall buildings. There is much we can contribute to those wider discussions. It is important to note that the Church does not think in 'economic life cycles' but rather in centuries and our unique insights may be beneficial as we partner the City, ensuring our London continues to flourish.

Notwithstanding these comments, we welcome the strategy and look forward to working together to continue to protect and enhance the heritage of our great City.

An interpretation strategy for the historic environment is in preparation.