

**City of London**

**Barbican and Golden Lane Conservation Area SPD**

**Consultation Statement**

**January 2022**



The Barbican and Golden Lane Conservation Area and Supplementary Planning Document (SPD) was published in draft for public consultation during an 11- week period from 12 May until 30 July 2021. Prior to the public consultation the draft was prepared by officers in the Department of the Built Environment in consultation with colleagues in that and other departments within the City 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 consultation was carried out in line with the City Corporation's Statement of Community Involvement 2016.

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

### **Website**

The draft SPD 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.

### **Inspection copies**

A copy of the draft SPD and supporting documents was made available at the Barbican Library.

### **Notifications**

Emails containing information about the draft SPD 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 SPD consultation and inviting comments were placed in across the Barbican and Golden Lane Estates.

The planned preparation of the draft SPD 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 SPD. The consultation was publicised on social media.

### **Responses received**

A total of 18 consultation responses were received.

8 of the respondents were residents either within the conservation area or nearby. The other respondents were interested parties or consultees including Historic England and Transport for London.

The table that follows summarises the comments and explains how they were addressed in finalising the SPDs. The responses are given in date order.

## Summary of comments and responses

\*comments and responses are published as received and uncorrected.

#	Section	Comment	Response
1	General - CA	<p><b>Resident – 8 April (Additional comment prior to the commencement of public consultation)</b></p> <p>p.9 – inclusion of Cullum Welch House and Ralph Perrin Centre in the list of designated heritage assets.            p.10 – amending the wording of the reference to Bridgwater House to clarify that it lies outside the conservation area boundary.            p.11 – correction of the wording to clarify the extent to which the north boundary of the CA relates to that with the London Borough of Islington            p.12 – correction of the number of flats within the Golden Lane Estate            p.12 – amendment of the wording to make it clear that some blocks look outwards to the surrounding streets but that the prevailing character of the GLE is self-contained and inwards-looking            p.15 – inclusion of Cullum Welch and Stanley Cohen houses in the list of residential blocks            p.16 – inclusion of Ralph Perrin Centre and the pub in the list of facilities            p.20 – inclusion of Willoughby House in the list of slab blocks            p.21 – correction of typo in name of Bryer Court            p.28 – correction of Cromwell to Speed Highwalk in relation to the Annan murals            p.28 – delete repeated paragraph about historic features etc</p>	<p><i>Suggested factual corrections received prior to the consultation. These were enacted prior to the consultation taking place.</i></p>
2	General LBMG + CA	<p><b>The Coal Authority – 17 May</b></p> <p>Thank you for your email below regarding the Barbican &amp; Golden Lane Conservation Area Character Summary &amp; Management Strategy and Barbican Arts Centre Listed Building Management Guidelines.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy &amp; Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications</p>	<p><i>Response noted.</i></p>

#	Section	Comment	Response
		<p>and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, the City of London area lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>	
3	General - LBMG	<p><b>Resident – 19 May</b></p> <p>1. The Volume III A document is a thorough and useful one and is greatly to be welcomed.</p> <p>2. I consider there is a case for differentiating between the heritage value of Cinema 1 and former Cinemas 2&amp;3 (in Frobisher Crescent). Cinema 1 is the only one of the three in its original use and configuration. With its richly figured plaster walls and ceiling which were designed to act as acoustic baffles for high volume amplified sound, but which also echo the plasterwork of pre-war 'super-cinemas', Cinema 1 has an unusually steep rake giving a remarkable viewing experience. It is a very significant interior ranking as one of the most important UK post-war cinema interiors, on a par with the listed Curzon Mayfair auditorium. Cinemas 2 &amp; 3 were originally lecture/ conference theatres in Frobisher Crescent used by the Cass (now City Univeristy) Business School and the spaces are much less distinguished. I consider Cinema 1 should be *** in heritage significance (page 15 table) but agree that ** is appropriate for Cinemas 2 &amp; 3.</p> <p>3. The circular toilets at the south end of each of the restaurant floors are striking in their detailing in terrazzo and for their compact circular plan and consequent cell-like forms. They are given passing mention in the narrative. These small but remarkable pieces of design are I believe unchanged, in</p>	<p><i>These comments relate to the draft Barbican Arts Centre SPD. Accordingly, no changes are required to the draft Conservation Area SPD.</i></p>

#	Section	Comment	Response
		<p>spite of the repeated re-fitting of the restaurant floors. Small in scale, I nevertheless consider they may merit *** in the page 15 table as highly characteristic of CPB design practice and of the Barbican idiom. Toilet facilities are rarely the subject of such careful detailing and execution. (I agree with the lower ratings for other toilet provision).</p> <p>4. There is passing mention of the extraordinary safety 'curtain' in the Barbican Theatre, apparently known as the 'Iron'. I last saw this operated about 5 years ago in a performance interval but understand it is still in situ and operational. However in the draft Guidelines it is included as part of the backstage area and given insufficient heritage status. This is a splendid contraption the public face of which is a highly unusual abstract rock-face design. It is unusual in its means of operation, both rising from the floor and descending from the fly at once. The operation of it is itself a theatrical moment. It should be treated as part of the auditorium and not the backstage areas. It should be given more prominence in the text and recognised at a higher heritage ranking of ****. It also merits specific mention in the 'traffic light' section. It would be advantageous to illustrate it in operation with photographs as I believe it maybe the only such stage safety 'curtain' in the UK and its visual impact is difficult to convey in words.</p> <p>5. The issue of lighting is discussed in relation to the coffers of the foyers, and elsewhere in the text. However, the lighting strategy of CPB was, in common with that across the public realm of the Barbican Estate (and before that on their Golden Lane Estate) characterised by a careful arrangement of fittings to give an almost invariably indirect, reflected light to spaces, even where (as with the original 'planet' fittings in Barbican foyers) the fittings were highly prominent. I consider the functionality of the lighting design—as distinct from the appearance of the fittings—needs greater emphasis. This is because successive lighting replacements show that those managing the building and those specifying changes have not understood that lighting design is as much about the quality, direction and functionality of the light given, as the appearance of the fittings.</p>	

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		<p>6. I very much hope the volumes, IIIB and IIIC and Volume IV will be prepared shortly. The Barbican Estate is a through-designed entity of coherent ideas on an unusually large and complex scale. It is remarkable—in UK and global terms—for that. Leaving 'holes' in the SPD Guidance would, therefore, be a grave omission.</p>	
4	General – LBMG + CA	<p><b>Resident – 22 May</b></p> <p>The two documents, which are richly illustrated, confirm the value of the original Barbican plan. Previous attempts to modify the design have often been disastrous (such as the canopy and gilded statues previously over the Silk Street entrance).</p> <p>What a shame that the Museum of London buildings were excluded from this survey. The building is a part of the Estate, shares design features (such as internal exposed concrete piloti) and is integrated into the pedway. If this building had been included, then guidelines could have been laid down for future use, and the preservation of these original features.</p>	Response noted.
5	General LBMG + CA	<p><b>Surrey County Council Minerals and Waste Planning Policy – 26 May</b></p> <p>Thank you for consulting Surrey County Council as the Minerals and Waste Planning Authority on the consultation for Barbican &amp; Golden Lane Conservation Area Character Summary &amp; Management Strategy and Barbican Arts Centre Listed Building Management Guidelines.</p> <p>Please note we have no specific comments to make.</p>	Response noted.
6	General LBMG + CA	<p><b>Natural England – 3 June</b></p> <p><b>Barbican and Golden Lane Conservation Area Character Summary and Management Strategy Supplementary Planning Document (SPD)</b></p> <p>Thank you for your consultation request on the above dated and received by Natural England on 12th May 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and</p>	<p><i>These helpful comments are noted. The 'Sustainability' section of the SPD has been updated accordingly.</i></p> <p><i>This respondent also submitted a very similar response to the draft Barbican Arts Centre SPD, which will be reviewed and assessed when that SPD is taken forward.</i></p>

#	Section	Comment	Response
		<p>managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p><b>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</b></p> <p><b>Green Infrastructure</b></p> <p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on <a href="#">Green Infrastructure</a> provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> <li>• green roof systems and roof gardens;</li> <li>• green walls to provide insulation or shading and cooling;</li> <li>• new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).</li> </ul>	

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		<p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "<a href="#">Good Practice Guidance for Green Infrastructure and Biodiversity</a>".</p> <p><b>Biodiversity enhancement</b></p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the <a href="#">Exeter Residential Design Guide SPD</a>, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p><b>Landscape enhancement</b></p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p><b>Other design considerations</b></p>	



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		<p>The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (<a href="#">para 180</a>).</p> <p><b>Strategic Environmental Assessment/Habitats Regulations Assessment</b>  A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance <a href="#">here</a>. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Please send all planning consultations electronically to the consultation hub at <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a></p> <p>Yours faithfully</p>	
7	General CA	<p><b>Resident – 3</b></p> <p>another..... What an incredible waste of time and money. Does the Corporation actually read residents' comments? I seem to remember a recent consultation on the new school and before that on the Denizen.</p>	<i>Response noted.</i>
8	General LBMG + CA	<p><b>Redbridge Council – 4 June</b></p> <p>Thank you for giving Redbridge Council the opportunity to comment on the Barbican and Golden Lane Conservation Area Character Summary and Management Strategy, and the Barbican Arts Centre Listed Building Management Guidelines. We have no comment to make on the documents referred to in your consultation. Thank you.</p>	<i>Response noted.</i>
9	General LBMG + CA	<p><b>Resident – 6 June</b></p> <p>I have read this review with interest.</p>	<i>Response noted.</i>

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		<p>But such a pity they did not see fit to suggest removing the simply HORRID corridor entrance to the Exhibition Halls that straddles and obstructs the podium in a dreadfully unsightly way - and obstructs residents walking along the Podium toward Barbican Station. It's awful.</p>	
10	General LBMG + CA	<p><b>Port of London Authority – 26 June</b></p> <p>Thank you for consulting the Port of London Authority (PLA) on the following documents:</p> <ul style="list-style-type: none"> <li>• Barbican and Golden Lane Conservation Area Character Summary and Management Strategy</li> <li>• Barbican Arts Centre Listed Building Management Guidelines</li> </ul> <p>Due to the location of the areas in question, the PLA has no comments to make on the proposals</p>	Response noted.
11	General LBMG + CA	<p><b>Resident and Member of Barbican Wildlife group – 19 July</b></p> <p>Dear Sir/Madam,</p> <p>Thank you for the opportunity to provide comments on your draft <i>Barbican and Golden Lane Conservation Area Character Summary and Management Strategy</i>. I am writing as a resident of the Barbican Estate and a member of the Barbican Wildlife Group.</p> <p>My comments are set out in the following paragraphs.</p> <p><b>1.The Blake Tower, formerly the Barbican YMCA but now a separate, private residential development, is situated between the two. (Page 4)</b></p> <p>This is factually incorrect. The YMCA (now Blake Tower) has always lain on the Barbican Estate, with the boundaries of the Estate running all the way to Fann St. Furthermore this opening statement is in contradiction to statements on pages 13 and 27 where this area is clearly stated as being part of the Estate.</p>	<p><i>These helpful and constructive comments are welcomed. They align with a number of other responses, including Nos. (13) and (15). Accordingly, changes have been made to the text in response to this respondent's points 1, 2, 4, 5, 6, 7 and 8. Their point 3, which is noted, relates to the area between the estates which is outside of the conservation area and therefore the scope of the draft SPD.</i></p>

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		<p><b>2. Outwardly, the buildings of both Estates have hardly changed. Development has largely been subtle (page 7).</b>  I would question the accuracy of this statement. I do not think the demolition of Milton Court, the first stage of the Estate to be completed, could be described as "subtle".</p> <p><b>3. Between the Estates (page 11).</b>  I continue to be disappointed that the significance of this area lying between the two Estates has been so quickly dismissed resulting in its exclusion from the Conservation Area.</p> <p>This area is important in a number of respects, including:</p> <ol style="list-style-type: none"> <li>1. The network of narrow streets in the Zone is the last remaining example of the type of street network which existed in the wider area before the Second World War, the remainder of which was lost when the Barbican Estate was built.</li> <li>2. It contains two of the few remaining pre-war buildings to survive the bombing, the Cripplegate Institute (which is listed) and Bridgewater House (built in 1926).</li> <li>3. The barrel vaulted rooflines of both Ben Jonson House and Bunyan Court on the Barbican Estate reference the feature detail on nearby Bridgewater House.</li> <li>4. 45 Beech St, designed and completed before the Barbican Estate scheme was finalised, had a defining influence on both the boundary of the Estate and the design of Bryer Court.</li> <li>5. The Cobalt Building, while maybe of little architectural merit as a stand alone building, sits on the exact footprint of the previous GPO Training School, a building which also survived the war and the failure to acquire this land was the main reason for the redesign of the North Barbican in 1962 (see later comments).</li> <li>6. The Jewin Welsh Church on Fann St is a continuing reference to an earlier building which once stood further south on Jewin Street, one of the streets lost when the Barbican Estate was built. As such it is a symbol of continuity between the pre-war and present day.</li> </ol>	

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		<p>7. Jewin Church, Bridgewater House, 45 Beech St and Bernard Morgan House (now sadly lost to us) all appear as important local area markers on all the early Chamberlin Powell and Bon drawings that I have viewed at the London Metropolitan Archives.</p> <p>Given the above points, this area deserves the protection that would come from being part of the Conservation Area. Non sympathetic development is clearly a continuing danger given the recent redevelopment of Bernard Morgan House into The Denizen apartment block to a design which is overly massed for the site and has had a detrimental impact on both the setting of a number of nearby listed buildings and the biodiversity value of the area.</p> <p><b>4. To the north is another, the Blake Tower, of a very different architectural treatment but tied into the whole by the shared material palette. This was original conceived as a YMCA, hence its different scale and architectural treatment to the others (page 25).</b></p> <p>One of the key reasons for its "architectural treatment" and also its scale was to provide an intentional linkage with the Golden Lane Estate, with the similarly massed Great Arthur House diagonally opposite.</p> <p><b>5. Within the Estate are numerous open spaces for the residents, most notably the two generous squares of Thomas More and Speed Gardens. (Page 25)</b></p> <p>There are in fact three residents Gardens on the Barbican Estate, with the third being Barbican Wildlife Garden. Why has this been omitted?</p> <p><b>6. There has been some infilling and westerly extension, but of a low and extremely muted kind (Discussion of CLSG under Civic Buildings, p27).</b></p> <p>I would question whether this is an accurate statement given the extensive changes that have been made to these buildings, including the loss of sight lines, changes to the roof, the severing of the lake into two bodies of water, amongst other changes.</p> <p><b>7. Description of North Barbican (page 28)</b></p>	

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		<p>After almost a full page description of the South Barbican, the North Barbican gets a disappointingly short, single paragraph which misses many of the key features of the North Barbican including its planting. Furthermore, there is no mention of Blake Tower, which is one of the defining buildings of the North Barbican, anchoring its northern boundary. I would draw your attention to revised wording which was submitted by Frederick Rodgers, a member of The Barbican Association's Planning Sub-committee, and endorsed by The Barbican Association in their response.</p> <p>Furthermore, I take complete issue with the description of the Barbican Wildlife Garden as "unruly" suggesting unkempt and unmanaged which could not be further from the truth. Local community volunteers, the Barbican Wildlife Group, give significant time to maintain the Garden. There is an active Management Plan in place, which links into the objectives of the CoLC Biodiversity Action Plan, and work is overseen by City Gardeners, with the focus being on the creation of habitats for wildlife. Given the definition of unruly as "<i>disorderly and disruptive and not amenable to discipline or control.</i>", I think this descriptor has been extremely poorly chosen.</p> <p>I would, instead, endorse the following wording, prepared by Joanna Rodgers, the joint Lead Volunteer of the Barbican Wildlife Group, as being a far more accurate and appropriate description of the Barbican Wildlife Garden:</p> <p><i>Although not included in the Registered Landscape, Barbican Wildlife Garden was used as contractors' compound during Phase IV of the development and then, with Bridgewater Square, laid out as a single amenity lawn around 1974. No groundworks were undertaken, so the bombed-out basements from WW2 were left under the Garden's mixed topsoil. After Bridgewater Square was incorporated into the nursery under Bunyan Court, the Garden was laid out as a wildlife garden in 1990, pre-dating the Natural History Museum's by five years. Subsequently, Barbican Wildlife Group, made up of local residents, began tending the Garden, with a City Gardener, around 2003, an arrangement that continues to this day.</i></p>	

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		<p><i>The Garden makes a substantial contribution to the biodiversity of the Estate, alongside its ambience and amenity value. It is well documented in Volume IV of the Estate's Listed Building Management Guidelines where 1.5.57 calls it "a self-contained landscape enclosure, rich in ecological value" and in 1.5.60 "the [Garden] constitutes an ecological and recreational resource of considerable significance and should be valued as such. On no account should it be reduced or redeveloped." In addition, in 3.1.15 (bullet points) "[the Garden] should be encouraged to evolve through the collaboration between the Barbican Wildlife Group and the Open Spaces Team. It is constantly being enhanced by volunteers for community benefit as well as to enhance its wildlife value. It has a wild exuberance that is unique on the Estate. Incremental change is perceived as positive evolution, provided the main structure of the [Garden] is not affected".</i></p> <p><i>Barbican Wildlife Garden has won several RHS London in Bloom awards, as well being open to the public on Open Garden Squares Weekend and laterly online during London Open Gardens. Along with Thomas More Garden, Speed Garden, the lakes, parts of Beech Gardens, St Alphage Garden and Barber Surgeons' Garden, it comprises the Barbican Estate, St Alphage Garden and Barber Surgeons' Garden Grade I Site of Borough Importance for Nature Conservation. .</i></p> <p><b>8. Section 7 Views (Page 31)</b></p> <p>This page provides a list of views considered to be significant. Numbers 8 to 10 relate to views from Beech Gardens. All of them look back on themselves suggesting that the Estate ends at Beech Gardens in some sort of cul-de-sac, a very inward looking mindset.</p> <p>I would suggest that one of the most significant views from Beech Gardens and one which you can see many people enjoying when you visit the Estate, is from the north end of Beech Gardens, looking north over the Barbican Wildlife Garden to Great Arthur House and the Golden Lane Estate. This view acknowledges that the two Estates together constitute a</p>	

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		<p>single residential neighbourhood, an idea which links back to many of the ideas that Chamberlin Powell and Bonn put forward in all their early reports.</p> <p>I hope these comments will be taken into account before finalising the <i>Barbican and Golden Lane Conservation Area Character Summary and Management Strategy</i>.</p>	
12	General CA	<p><b>'Non- resident' - 27 July</b></p> <p>I got interested in the barbican estate when doing my Urban Design course and seeing all the comments from the public on how much they disliked the high-level walkways.</p> <p>The walkway always seemed to me to be a logical response to the setting i.e. this estate is on the Roman Walls of London. "High level walkways" are a good way to summarise the character of defensive walls!</p> <p>It is intrinsic to the character of the space.</p> <p>The Golden Lane estate came to my notice when asked as a Civic Trust Awards Assessor to judge the intervention at the Community Centre/ sports hall. I liked the estate and thought the award should be delayed until all the restoration work is completed.</p> <p>I loved the fact that Powell was a keen gardener. Always good to know the passions of the architects you appoint.</p> <p>The character also reflects its position, look at your photo on page 17 of the castle wall barbican shape to this piece of garden sculpture! It really is the key to the areas character!!!</p>	Response noted.
13	General LBMG + CA	<p><b>Planning Subcommittee of Barbican Association – 28 July</b></p> <p><b>Barbican and Golden Lane Conservation area: Draft Supplementary Planning Documents June 2021</b></p>	1. <i>The comments from the Barbican Association</i>

#	Section	Comment	Response
		<p><b>Comments from the Barbican Association</b></p> <p>The Barbican Association (the BA) welcomes the Conservation Area SPD (SPD) as an important tool in helping to preserve the specifically mid 20<sup>th</sup> century features of this area – architecturally, in terms of urban design, and also in terms of its communities.</p> <p>We make a series of specific comments on the text below. But one overarching comment is that the document says much about the architectural characteristics of the conservation area, but is light on its predominantly residential nature. Many of the design features of the two estates arose out of Chamberlin Powell and Bon’s underlying ideas about making communities and residences liveable in. That fact should have consequences for the way the conservation area is treated.</p> <p>One example might be that the removal of signage about behaviour on the Barbican Estate (no cycling, skateboarding, dog fouling, music playing etc) before the first lockdown of the pandemic in 2020 and its continued absence throughout all of 2020 and most of 2021 had an adverse impact on the community in terms of antisocial behaviour. Such signage is important in residential areas and its treatment is rightly included in the listed building management guidelines volume IV.</p> <p>In addition to the comments below, we also attach some detailed comments and expansions of the SPD prepared by Fred Rodgers, a member of the BA’s Planning Subcommittee. These add much valuable detail on the history and architectural features of the conservation area buildings and spaces. We refer to some particularly useful additions and corrections from his document that we think, from the prospective of the Barbican Estate, should be added to the SPD</p> <p>We believe that many of Mr Rodgers’ comments add richer detail to the document. However, there are two comments the BA does not endorse:</p> <p>a) The BA is not seeking the removal of the footbridge across Aldersgate Street [p22 of Mr Rodgers’ commentary]. This provides a</p>	<p><i>This response is very helpful and is welcomed. The general observations are noted. The detailed, page-by-page observations largely align with other responses (11) and (15). Revisions to the draft SPD have been made to address these points.</i></p> <p>2. <i>Detailed track changes from the member of the Planning Subcommittee (shown in appendix G)</i></p> <p><i>These detailed comments have been extremely helpful in correcting typological errors and expanding the detail and quality of the SPD. The additional text relating to Barbican Wildlife Garden is particularly welcomed. The majority of suggested ‘track changes’ have been implemented. Where they have not, this is for reasons of tone, editorial emphasis or concision. In addition, the member included a number of comment boxes within the document. The majority of these are statements, which are noted, but some are questions. Some are addressed by proposed changes to the text, but the remainder require a CoL response, as follows:</i></p> <p><i>p.9 – No guidelines are currently proposed to manage the Golden Lane Estate Designated Landscape.</i></p>



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		<p>valuable traffic-free route from the tube to the Arts Centre via the highwalk. Its removal would lead to more pressure on a narrow staircase from Lauderdale Place – and subsequent pressure for a bigger access route, potentially more damaging to the listed landscape.</p> <p>b) The Barbican Association makes no comment on the Legible London signage [p20 of Mr Rodgers' paper]. The BA was consulted about its adoption and the positioning of signs on the early pilot route through the estate (though not on the subsequent roll out), and the BA did not object to its listed building consent.</p> <p><b>Specific comments – by page number</b></p> <p>p4 1st point Blake Tower is part of the Barbican Estate and not separate from it. Fann Street separates the two. [See <a href="https://historicengland.org.uk/listing/the-list/list-entry/1001668">https://historicengland.org.uk/listing/the-list/list-entry/1001668</a>]</p> <p>p5 – Last para “Cripplegate <b>and Aldersgate wards</b>”</p> <p>p7 Paragraph starting “Outwardly...” This section on the history of changes on the Barbican Estate should mention: -The blocking off of the vista from the south lake to Thomas More Gardens by extensions to the City of London School for Girls (CLSG) in 1988-91 and works in the early 1990s that included the removal of the bridge over the two lakes by CLSG and the addition of rooftop accommodation.</p> <p>In fact there has been several changes within the estate, most of them detrimental and we would urge the drafters of this SPD to include them:</p>	<p><i>p.17 – the subsequent alterations to the Barbican Estate have been expanded upon in the 'History' and 'Barbican Estate' sections. The division into north and south character areas is considered a useful distinction between quite different areas of the estate.</i></p> <p><i>p.19 – in view of the number of trees extant on the estate, an overview of the species and a description of their general contribution was considered appropriate here.</i></p>

#	Section	Comment	Response
		<p>-The demolition of Milton Court            -The conversion of the YMCA to residential flats in 2013-17            -The enclosure of several tower balconies at various periods, thus diminishing the dramatic profiles of the towers            -The insertion of link building (the yellow shed) between the Arts Centre and the Exhibition Halls across the upper podium, cutting across the full vista down Beech-Ben Jonson gardens            -The conversion of Exhibition Hall 1 into cinemas and a restaurant            -The conversion of Bridgewater Square into the the play area for the Bright Horizons Nursery, including the erection of the steel access steps and ramp and the creation of the Barbican Wildlife Garden in 1988/90 from the lawns laid out in 1974.            The loss of part of the Wildlife Garden for the Tudor Rose Court development.</p> <p>Last paragraph starting "Long praised."            There is a reference to the Barbican buildings all being listed as grade II (except Crescent House, grade II*). Crescent House is part of Golden Lane Estate (GLE).</p> <p>p8            Relevant policies in the Draft City Plan 2036 should include            S11 Historic environment            S23 Smithfield and Barbican</p> <p>p9            The Dorothy Annan murals are on Speed Highwalk, not Cromwell Walk</p> <p>Paragraph starting "Shortly after"            "Some time after" would be more accurate. GLE was listed in 1997 and its Listed Building Management Guidelines were published in 2007, and the first volumes of the Barbican Estate Listed Building Management Guidelines were published about 10 years after listing; 2 volumes have still not been published and one is not even in draft.</p>	

#	Section	Comment	Response
		<p>p10 Sustainability and Climate Change  This section seems muddled. Clearly the risks of climate change are very important and measures will have to be taken to reduce carbon emissions  *It is not clear why the flood prevention measures are specifically relevant to the conservation area  *There is no mention of the need to make the dwellings on both estates more energy efficient and resilient to climate change</p> <p>*This section seems to ignore that in the Barbican Estate there already exist areas of green that are comparatively large for the City of London – the internal communal gardens, the highwalks, Beech Gardens and the Wildlife Garden</p> <p>Suggest remove the reference to the Beech Street air quality experiment. It will be over by the time the SPD is published. Suggest replace it with something along the lines of "There are proposals to make much of the conservation area into a zero emissions zone"</p> <p>p11 Between the estates.  Please see the attached annotated copy of the text of the SPD for a much richer account of the area between the estates.</p> <p>p12 Penultimate paragraph of the introduction to Section 5.Buildings....  There is some text missing in the printed paragraph. It doesn't make sense.</p> <p>Final paragraph – Please see attached annotated copy of the text of the SPD for a richer account of Bridgewater Square</p> <p>p14  Although under GLE, the heading "For Locals" isn't immediately understandable by reading what follows. It also sounds patronising to residents.</p>	

#	Section	Comment	Response
		<p>p21 The paragraph below comes from Mr Rodgers' commentary. Although this is a comment on the setting of the GLE, the point about inappropriate developments on the periphery of the Conservation Area is well made: "The recent redevelopments of both Bernard Morgan House and the former Richard Cloudesley School site, both on Golden Lane, have had a significant impact on the setting of the [Golden Lane]Estate. The former has caused harm to the setting of Bowater House in particular and the latter has caused more significant harm to the setting of both Hatfield House and <b>Basterfield</b> House. In both cases, public benefit outweighed the harm in the eyes of City Corporation <b>but</b> a more objective balance must be demanded in future to maintain the original architectural character of the Estate "</p> <p>p22 Barbican Estate 3<sup>rd</sup> paragraph This paragraph comments that there is little likelihood of external change within the Barbican. It should add that there has been and continues to be huge change to its setting, increasing canyonisation due to ever taller buildings being built on its periphery, including in the proposed London Wall West development</p> <p>Also in the 3<sup>rd</sup> paragraph is the statement "Because, externally, it has undergone very little alteration (apart from modest works to the civic buildings),"</p> <p>We challenge that statement: The demolition of a whole building (Milton Court) is hardly modest. Also the Highwalks have been severed from the surrounding City in a couple of places.</p> <p>And the changes that we have listed on p 7 may appear relatively minor, but they have had a significant impact on important features and</p>	

#	Section	Comment	Response
		<p>characteristics of the estate (eg blocking off intended vistas – part of the interaction of space and buildings in the Grade II* listed landscape).</p> <p>p25 Public realm 2<sup>nd</sup> paragraph:" Within the Estate are numerous open spaces for the residents, most notably the two generous squares of Thomas More and Speed Gardens." The Barbican Wildlife Garden should be mentioned here. How about "Along with the Barbican Wildlife Garden, on the north edge of the estate the Barbican Gardens form a Site of Borough Importance for Nature Conservation (SBINC) Grade 2, to be confirmed Grade 1 on adoption of the Draft City Plan 2036."</p> <p>This paragraph mentions trees but doesn't list them, as it does for GLE.</p> <p>Final paragraph: Not all the carparks and stores are at true ground level – suggest deleting "at true ground level".</p> <p>Also Beech Street has not been a dual carriageway for some time. It is a two way street of single carriageways, with bicycle lanes</p> <p>p27 We support the addition of Mr Rodgers' description of the additions to the CLSG (in the attached document). Through a series of piecemeal developments, the CLSG is the one component of the Barbican Estate that has undergone substantial external change, mostly to the detriment of the original architecture (the roof line, the cluster of buildings by the lake) and landscape (blocking off the lake bridge and the view from the lake to Thomas More Garden). Moreover, the Corporation, as the school's owner, has twice recently proposed extensions to the school within the estate. Both were withdrawn by the school, the second because it would have significantly damaged the Grade II* listed landscape.</p>	

#	Section	Comment	Response
		<p>As the CLSG expands outside the estate, it should be an aspiration of the SPD to restore some of the original landscape features.</p> <p>p30 The section on Beech Street zero emissions should be removed. It will be out of date by the time the SPD is published</p> <p>p31/32 Suggest add a further image: 28. From Beech Gardens looking north This is a view from behind Bunyan Court over Barbican Wildlife Garden and Fann Street to Golden Lane Estate, showing how the two estates merge at Fann Street.</p>	
14	General LBMG + CA	<p><b>Historic England – 29 July</b></p> <p>Dear Development Plans Team, <b>Barbican and Golden Lane Conservation Area Character Summary and Management Strategy draft guidance document consultation response</b> Thank you for consulting us on the draft Barbican and Golden Lane Conservation Area Character Summary and Management Strategy.</p> <p>Conservation areas are designated for their special architectural or historic interest, the character and appearance of which it is desirable to enhance or preserve (Planning (Listed Buildings and Conservation Areas) Act 1990). Under section 12 of the National Planning Policy Framework (NPPF) they are defined as designated heritage assets and benefit from a presumption in favour of the conservation of their historic significance.</p> <p>The designation and management of conservation areas is a matter for local determination, however, as the Government's advisor on the historic environment Historic England is pleased to offer advice in support of local heritage protection, drawing on our national perspective.</p>	<p><i>These very helpful comments are welcomed.</i></p> <p><b>Problems and enhancements</b> <i>The management strategies as drafted are considered proportionate to the unique qualities of this conservation area.</i></p> <p><b>Audit of heritage assets</b> <i>It is considered that the list of designated heritage assets on page 9 of the SPD is sufficient for the purpose mentioned.</i></p> <p><b>Images</b> <i>Response noted; images have been finalised and 'placeholder' removed.</i></p> <p><b>Boundaries</b> <i>Noted. The boundaries have been walked and clarified.</i></p>

#	Section	Comment	Response
		<p>This letter begins with general observations on the structure of the document, proceeds with specific comments on the contents of the document as it is read, and concludes with a list of minor editorial notes.</p> <p><u>Structure and best practise</u> Historic England welcomes the care that has been taken to prepare this proposed SPD document at a time when the two estates protected by the conservation area are undergoing a great deal of change, including within their settings.</p> <p><i>Historic England Advice Note 1 (2<sup>nd</sup> Edition): Conservation Area Appraisal, Designation and Management</i> provides detailed guidance on best practise for conservation areas. The Note contains several recommended elements of an SPD document which are omitted from the Barbican and Golden Lane draft.</p> <p><b>Problems and enhancements</b> One omission an assessment of condition and an identification of problems and pressures is suggested (pages 25-26), with the objective of feeding into a management plan for the conservation area (page 29). The reference to the two sets of Listed Building Management Guidelines, in the sections on pages 21 and 29 of the draft SPD, is noted, but a fuller consideration of broad or high-level issues for the conservation area as a heritage asset and for its edges could helpfully be made explicit here. It could feed into fuller sections on 'Potential enhancements' in relation to the two estates. The new London Plan (2021) and NPPF (2021) both stress that local planning authorities should pursue opportunities for development that could enhance conservation areas.</p> <p><b>Audit of heritage assets</b> Also lacking is a clear and separate audit of heritage assets (page 24), which could be particularly helpful on these complex estates composed of multiple individual heritage assets, many though not all of which are contained in the list of designated heritage assets on page 9.</p>	<p><b>Non-designated heritage assets (NDHAs)</b> Noted.</p> <p><b>Sustainability and climate change</b> Noted and this section has been revised.</p> <p><b>Streets, routes and transportation</b> Noted and this section has been expanded.</p> <p><b>Views</b> Noted and views have been added.</p> <p><b>Local details</b> Noted and revisions have been made.</p> <p><b>Editorial comments</b> These are noted and revisions have been made.</p> <p><i>N.B. this respondent also issued a lengthy response relating to the draft Arts Centre LBMG SPD. This has been omitted in this Consultation Statement for reasons of brevity as the Arts Centre SPD is being brought forward at a later date.</i></p>

#	Section	Comment	Response
		<p><b>Images</b> Notwithstanding that most of the photographs in the document are labelled 'placeholder image', in general these photographs are well-chosen as illustrations for the text and used to beneficial effect.</p> <p><u>Contents</u></p> <p><b>Boundaries</b> The list of Golden Lane Estate trees on page 16 includes "the large acer on the corner of Fann St and Golden Lane", which it notes "is on the Estate land although it reads as a street tree". It is clear from the conservation area boundary map on page 3 that this tree is located outside the conservation area boundary. As well as the protection that may therefore be required for this tree, this condition suggests that, right around the perimeter, a detailed comparison of the estate boundaries and the existing built and natural environment with the conservation area boundary might be a helpful exercise.</p> <p><b>Non-designated heritage assets (NDHAs)</b> This section (page 9) states that "these [NDHAs] are identified at the earliest stage in the planning process, with reference to current national criteria. This may be supported by additional research or investigations as appropriate". Further to the note above ('Content and best practise'), the Government's Planning Practise Guidance is clear that NDHAs and the criteria used to identify them should be identified proactively as far as possible by local planning authorities, specifically through such processes as conservation areas appraisal and review (see: PPG paragraph 040 Reference ID: 18a-040-20190723).</p> <p><b>Sustainability and climate change</b> This section (page 10) could go further to describe potential conflicts between the character and appearance of the Barbican and Golden Lane Conservation Area and the pressures caused by climate change and the need to develop sustainably. The caveat expressed in the second bullet point – that "aspiration will be balanced by the need to preserve and enhance the character and appearance of the conservation area and the</p>	



#	Section	Comment	Response
		<p>special architectural and historic interest of the listed buildings” – might stand as a general undertaking in relation to this topic. The special historic and design interest of the registered parks and gardens should also be noted.</p> <p>Other considerations might be included in this section. For instance, the special architectural interest of the two estates is liable to be harmed by the introduction of air conditioning services. The special design interest of the landscaping in the two RPGs could be harmed by the sustainable urban drainage measures that are encouraged if they were installed in a manner insensitive to heritage.</p> <p><b>Streets, routes and transportation</b></p> <p>The discussion of Beech Street on page 30 could more explicitly state that the covered route is part of the conservation area, but that the more significant character and appearance of Beech Gardens above is insulated from it by the podium. The fact of its conservation area designation is important in relation to the worthwhile aspirations for its enhancements discussed in the section of the Xero Emissions pilot scheme which follows. Long-term planning for the streets around the Golden Lane Estate, some permanently and others temporarily pedestrianised, may also beneficially be discussed here in relation to character and appearance.</p> <p><b>Views</b></p> <p>Pages 31-32 give a list of conservation area views which is noted as a “starting point”. Comparison against the ‘significant vistas’ in LBMG Appendix A suggests several more:</p> <ul style="list-style-type: none"> <li>• The (lost) view looking west from the far east end of the highwalk north-east of Frobisher Crescent and south of Ben Johnson House (This is currently blocked by the structure that provides access down to the Exhibition Halls but understood due to be restored when the City pursues demolition without reinstatement as recommended in the LBMG as part of emerging proposals.);</li> <li>• Looking west along Speed highwalk toward the Arts Centre / Conservatory;</li> </ul>	

#	Section	Comment	Response
		<ul style="list-style-type: none"> <li>• looking east-north east across the private gardens from the highwalks under Seddon House and Thomas More House; and</li> <li>• looking north-north east from the bridge connecting Wallside to Thomas More House.</li> </ul> <p><b>Local details</b></p> <p>This section, pages 34-36, might better be titled 'Local details and public art'. The Matthew Spender sculpture pictured on page 36 is not referred to in the text. This section might discuss whether any public art strategy or programme for conservation would benefit the conservation area. The Banksy and Minnick pieces are particularly vulnerable to erasure, and more explicitly statement as to their contribution and measures that might be needed for their protection could be included here.</p> <p><u>Editorial comments</u></p> <p>In general, the text would benefit from close proof-reading to identify typographic errors and to ensure clarity. Some of the more significant errors and omissions are noted as follows:</p> <ul style="list-style-type: none"> <li>• Chamberlin, of Chamberlin, Powell &amp; Bon is misspelled 'Chamberlain' on pps. 4,7 and 12.</li> <li>• The paragraph beginning "The Blitz..." on page 5 contains an ambiguous statement on London's growth from the Roman core in the City and indeed the history of the Barbican area in this period.</li> <li>• Additionally, the chronology of the history section on page 5 is mixed up, jumping from the Blitz back to the Great Fire.</li> <li>• Highwalks is misspelled 'highwalls' on page 6.</li> <li>• The phrase "...landmark early modern housing scheme" on page 6 is ambiguous in its reference to style and period.</li> <li>• The description of the eastern boundary given on page 11 seems to omit mention of the condition between approximately Beech Street and Fore Street, where large post-war office development dominate and, significantly, the bocks west of Moorgate Underground Station which are under reconstruction at the time of writing.</li> </ul>	

#	Section	Comment	Response
		<ul style="list-style-type: none"> <li>• The last sentence in 'Overall character and appearance' on page 13, referring to Gibberd and Cullen, is ambiguous and unclear on the lines of influence suggested.</li> <li>• The names of the maisonette blocks are omitted in the first paragraph on page 15.</li> <li>• The accounts of different Golden Lane Estate buildings given on page 15 could helpfully refer to their listings and perhaps list descriptions.</li> <li>• A word is missing in relation to the Golden Lane threshold under 'Public realm' on page 20.</li> <li>• Basquiat is misspelled 'Basquiat' on page 34.</li> </ul> <p><u>Conclusion</u> Finally, we would underline that this opinion is based on the information provided by you. To avoid any doubt this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p> <p>We welcome this opportunity to support your preparation of this conservation area SPD, and we hope that you find our advice helpful in finalising the document. Please do not hesitate to contact me if you have any questions about the contents of this letter.</p>	
15	General LBMG + CA	<p><b>Resident – 29 July</b></p> <p><b>Introduction</b></p> <p>I am a member of the Barbican Association (BA) Planning sub-Committee but this response is made in my personal capacity. However, BA's formal response submitted on 28 July not only includes my revised version of the SPD (FR Draft) but makes reference to it, including qualifying two parts. Since 28 July, I have made minor amendments to the FR Draft and these changes are shown in the FR Draft Edit in the Appendix. Many apologies for any confusion but please also consider the changes in the FR Draft Edit when considering the FR Draft. The latter is a Word version of the consultation SDP with all the original images removed.</p>	<p><i>This response is from the author of the very helpful suggested 'track changes' attached to response number 13. Some minor amendments to those proposed changes are included here (and shown in appendix G). The rest of the response relates to the designation of the conservation area boundary and the history thereof – matters which lie outside the scope of this draft SPD, which is concerned with articulating the character</i></p>

#	Section	Comment	Response
		<p><b>The Barbican and Golden Lane Conservation Area (CA)</b></p> <p>In October 2016, I represented the BA with two members of Golden Lane Estate Residents' Association (GLERA) when we met Kathryn Stubbs, City Corporation's Deputy Director for the Heritage. The purpose of the meeting was to request that City Corporation designate a conservation area (proposed CA) which was more extensive than the CA designated by City Corporation on 8 October 2018.</p> <p>Ms Stubbs said she was far too busy on a project to review all the then 26 conservation areas and wouldn't have time to consider our request until that review was completed – in several years' time. Despite Ms Stubbs' dismissal, on 23 May 2017, City Corporation's Planning and Transportation Committee (P&amp;TC) agreed that "the assessment and analysis of the proposed [CA] would be carried out in accordance with policy and national guidelines". One reason for the volte face was a public online petition organised by BA and GLERA calling for the creation of the proposed CA, which, with a separate paper petition, attracted over 1.000 signatures. The other reason was the imminent approval by P&amp;TC of the destruction of Bernard Morgan House at 43 Golden Lane and its replacement with the massive and entirely inappropriate Denizen. That planning application had attracted over 150 objections.</p> <p>On 14 November 2017 P&amp;TC considered the Officer's report appraising the proposed CA. This had, for some unexplained but obviously self-serving reason, divided the proposed CA into five separate "zones":</p> <p>Zone 1 - Golden Lane Estate (GLE);  Zone 2 - The area between Zone 1 and Zone 3;  Zone 3 - Barbican Estate (Barbican);  Zone 4 - The area, including City Corporation's Brewery Conservation Area - "inherited" from LB Islington in the 1995 administrative boundary changes - bordered by Chiswell Street, Moor Lane and Silk Street; and Zone 5 - The area bordered by Barbican, Aldersgate Street, Fore Street, Fore Street Avenue and London Wall.</p>	<p><i>and appearance of the conservation area as designated by Members in 2018 and providing a management strategy. Accordingly, the response is noted.</i></p>

#	Section	Comment	Response
		<p>Zone 1 was the listed area of GLE - mostly Grade II but Grade II* for Crescent House. Hatfield Lawn and Basterfield service road were excluded without explanation other than that the two areas were not listed – something that is irrelevant to conservation area status.</p> <p>Zone 3 excluded parts of Barbican, including the listed Cripplegate Street pedestrian ramp to Ben Jonson Place and the listed service yard to Exhibition Hall 2, along with other unlisted parts, including the service yard to Exhibition Hall 1, Barbican Wildlife Garden and Bridgewater Square. A small area of the Barbican Grade II* registered landscape was also omitted, being in Zone 5.</p> <p>P&amp;TC, following the Officer's recommendations, refused to include Zones 2, 4 and 5 in the proposed CA prior to a public consultation:  <i>Debate ensued and several Members expressed the view that it was wrong to exclude Zone 2 which they considered was a critical part of the estate and should be included in the consultation.</i>  <i>Other Members considered that it would be wrong to include the area given that future planning applications would be affected, and also that it would be wrong to seek the views of people who wouldn't be affected.</i></p> <p>The inclusion of Zone 2 was put to a vote, which was defeated 14-11  The public consultation ran from December 2017 until 12 February 2018. The responses made by my wife and I challenged the grounds on which the Officers had determined not to recommend the inclusion of the whole area of the proposed CA and requested its inclusion.</p> <p>In March 2018, The Twentieth Century Society held a workshop – C20 Conservation Areas:  <i>Making it Happen</i> – following its report, funded by Historic England on C20 conservation areas to celebrate the 50th anniversary of the passing of the Civic Amenities Act 1967.</p> <p>This was very interesting as the main speakers were experienced and knowledgeable Local Authority conservation officers. No City Corporation Officer attended but all the attendees I spoke to about the proposed CA were critical of the appraisal submitted to P&amp;TC.</p> <p>P&amp;TC met on 8 October 2018 to consider the Officer's report on the result of the public consultation which recommended the inclusion of both Barbican</p>	

#	Section	Comment	Response
		<p>Wildlife Garden and Bridgewater Square - from Zone 2 – and the omitted part of the registered landscape – from Zone 5 - in the CA but nothing else despite there being a majority of responses against the refusal to designate the whole of the proposed CA. As far as Zone 2 was concerned:</p> <p><i>The Deputy Chairman stated that any redevelopment would have to consider the character of the adjoining Conservation area and that the importance of these buildings could therefore be recognised without having to necessarily include them within the proposed conservation area and adjust the boundaries.</i></p> <p><i>A second Member stated that she also felt that it was a mistake not to include these buildings within the conservation area and proposed an amendment seeking to adjust the proposed boundaries to include these.</i></p> <p><i>Another Member seconded this proposal and it was put to the vote. 9 voted in favour of the amendment and 10 against with 2 abstentions.</i></p> <p>As a result, we now have the CA, which was determined purely politically. This is the result of areas being omitted from the proposed CA as the result of a shallow and subjective appraisal, rather than a deep and objective one. According to Historic England:</p> <p><i>Conservation areas exist to manage and protect the special architectural and historic interest of a place - in other words, the features that make it unique.</i></p> <p>And:</p> <p><i>In conservation areas there are some extra planning controls and considerations in place to protect the historic and architectural elements which make the place special.</i></p> <p>While both GLE and Barbican are unique, these also comprise historic and architectural elements to the extent that all buildings and both landscapes - except Barbican Wildlife Garden, Bridgewater Square and Exhibition Hall 2 service yard - are also protected by listing.</p> <p>Zones 4 and 5 and the excluded area of Zone 2 - most of which is integral with the Garden and the Square - are also unique and contain historic and architectural elements, some of which are either scheduled monuments or listed:</p>	

#	Section	Comment	Response
		<p>Zone 2:</p> <p>45 Beech Street: An office block by Frank Scarlet, completed in 1958. It's position on Beech Street defined the shape of the adjoining part of Ben Jonson Place and the eastern aspect of Bryer Court.</p> <p>Bridgewater House: An office block in Bridgewater Square, completed in 1926, extended and converted to mixed residential and commercial use in 1995. The tall rounded windows and coloured fascia are original although renewed in 1985 when in the ownership of the Prudential.</p> <p>The Cobalt Building: A block of flats in Bridgewater Square, completed in 1997 on the site of a pre-WW1 office block that survived WW2 intact.</p> <p>Tudor Rose Court: A block of sheltered housing completed in 1997 partly on what was part of the adjoining Barbican Wildlife Garden. By Avanti Architects with design cues from GLE blocks.</p> <p>Eglwys Jewin: Acknowledged as an undesignated heritage asset by City Corporation. By Caroe and Partners, completed in 1961, on the foundations of the previous 19th Century church destroyed in WW2.</p> <p>1 Golden Lane: Originally Cripplegate Institute with library, educational facilities by Sydney R Smith, completed 1896. Two floors with theatre by Frederic Hammond added prior to 1912 and a redevelopment on an adjoining bomb site, incorporating the existing building completed in 1992. Listed Grade II.</p> <p>Street network: Bridgewater Street, Bridgewater Square, Viscount Street and Brackley Street are shown on mid 18th Century maps. The part of Fann Street, excluded from the CA, is late 19th Century. Golden Lane, north of Brackley Street existed in the 17th Century. Its southern section was re-aligned with the Barbican development. Cripplegate Street is also late 19th Century but</p>	

#	Section	Comment	Response
		<p>part was pedestrianised between the Barbican development and the redevelopment of 1 Golden Lane.</p> <p>Zone 4:  The Brewery CA: Designated by LB Islington prior to 1995.  Milton and Shire House: An office block by Sheppard Robson, completed in 1980 and renovated in 1996.</p> <p>Milton Gate: An office block by Denys Lasdun, completed in 1991 and renovated by Squire &amp; Partners on a separate island site next to the Brewery.</p> <p>Zone 5:  Area enclosed by London Wall, Fore Street Avenue, Fore Street and Wood Street, connected to Barbican by pedways from both Andrewes Highwalk and The Postern.</p> <p>1 &amp; 2 London Wall Place: Office block by MAKE Architects, completed 2018.  St Alphage Gardens, London Wall: Laid out as a public garden in 1872, south of a high section of Roman Wall. Part of the Barbican Estate, St Alphage and Barber-Surgeons' Garden Site of Borough Importance for Nature Conservation Grade 1 (TBC).</p> <p>Remains of St Alphage Church, London Wall: Scheduled Monument.</p> <p>Remains St Alphage Church Tower, London Wall: Grade II Listed Building.</p> <p>Salters' Hall, Fore Street: Livery Hall. Grade II Listed Building by John S Bonnington Partnership, from concept by Basil Spence, completed 1976. Restoration and extension by De Metz Forbes Knight Architects, completed 2018.</p> <p>Salters' Garden: Opened in 1981 and redesigned as a knot garden by David Hicks in 1995. On the other side of the high section of Roman Wall from St Alphage Gardens.</p>	



#	Section	Comment	Response
		<p>Roman House, Wood Street: Former office building by R N Wakelin, completed 1957, first in the post-WW2 London Wall Route XI scheme and converted into flats in 2013/14 by The Manser Practice. An inscription on the wall fronting Fore Street denoting where the first WW2 bomb landed on London on 25 August 1940.</p> <p>Area enclosed by Aldersgate Street, Barbican, Wood Street and London Wall, connected to Barbican at both ground and highwalk level.</p> <p>Museum of London: By Powell and Moya, completed in 1976 in the final part of the London Wall Route XI scheme. Subsequent alterations from 1990 onwards enabled the grant of a Certificate of Immunity from Listing (ColfL), expiring in 2024. Adjoins the CA</p> <p>Bastion House, London Wall: Also, by Powell and Moya, completed 1977, the sixth and final tower of the London Wall Route XI scheme. Now has the same ColfL as the Museum of London.</p> <p>Ironmongers' Hall, Shaffesbury Place: Livery Hall by S J Tatchell, completed 1925 and recognised as an undesignated heritage asset by the City Corporation.</p> <p>Ferroners' House, Shaffesbury Place: Office block adjoining Ironmongers' Hall by Fitzroy Robinson &amp; Partners, to a design by Powell and Moya, completed 1977.</p> <p>Barber-Surgeons' Hall, Monkwell Square: Livery Hall by Kenneth Cross, completed 1969.</p> <p>Barber-Surgeons' Garden: Including a herb garden within the circular walls of Bastion 13, created in 1991 as a celebration of the passion for healing herbs of John Gerard, a 16th Century Barber-Surgeons Liveryman. Now part of the Barbican Estate, St Alphage and Barber-Surgeons' Garden Site of Borough Importance for</p>	

#	Section	Comment	Response
		<p>Nature Conservation Grade 1 (TBC).</p> <p>Alban Gate, London Wall, and 2-10 Monkswell Square: A postmodern mixed development by Terry Farrell and Partners, completed 1992, refurbished in 2013/16.</p> <p>Monkswell Square: Originally formed post WW2, reduced in area as part of the Alban Gate development and laid out to Terry Farrell's design.</p> <p>Site of the Roman and Medieval gateway of Cripple Gate, Wood Street: Scheduled monument.</p> <p>Not only does the SPD require revision, the CA requires expanding to include Zones 4 and 5 and the excluded parts of Zone 2 along with Hatfield Lawn and Basterfield service road.</p> <p><b>The SPD</b> The amendments in the FR Draft and FR Draft Edit are submitted in response to the public consultation. In part these amendments are additions of factual details, corrections of errors, including typos and editing of part of the text. My added comments are hopefully self-explanatory and the green highlighting is intended to question the original text.</p> <p>My response is an attempt to ensure that the final SPD is correct in fact and the final document is worthy of City Corporation. I hope this is helpful, although I'm sure there will be both mistakes on my part and errors missed.</p>	
16	General LBMG + CA	<p><b>City of London Conservation Area Advisory Committee – 30 July</b> Members of the City of London Conservation Area Advisory Committee were encouraged to engage with the Consultations on an individual basis. As a Committee the subject was considered as an agenda item following a presentation from an officer of the Planning Department.</p>	<p><i>Response noted and welcomed. The section on the Arts Centre has been enlarged in response to the comments upon the draft Conservation Area SPD.</i></p>

#	Section	Comment	Response
		<p>Both documents were considered to be exemplary and, other than minor matters which no doubt will be dealt with at a final editing stage, there is little to add/suggest.</p> <p>As far as the Barbican and Golden Lane Conservation Area overview is concerned, the national importance of the two developments both as a unity and individually is well made. It was felt that dealing with the Barbican Arts Centre in just two short paragraphs was perhaps a little too scant. More generally it was hoped that the ongoing maintenance programme would be sufficient to keep the fabric in as good a condition as possible. This is particularly important as far as the Golden Lane Estate is concerned given its greater reliance on painted finishes. The importance of the Leisure Centre to the 'vision' and ongoing success of Golden Lane was also emphasised.</p> <p>The draft Building Management Guidelines for the Barbican Arts Centre was admirably detailed. The critique of the subsequent changes to the fabric, almost all detrimental and often short lived, serves as a caution for future changes. Similarly the anticipation of likely future changes (such as to the original lavatories) and how they might best be dealt with was valuable in guarding against change by attrition. A focus on the qualitative was useful as, arguably, this is difficult to adequately address via the planning process. Under this the importance of colour (or lack of it), the nature (rather than blunt square footage) of circulating space plus the appropriateness of its use for non-envisioned purposes (such as temporary stands and storage) are so important in maintaining the original architectural experience for the visitor.</p>	<p><i>The comments on the draft Arts Centre SPD are noted for future revision of that draft SPD.</i></p>
17	General CA	<p><b>Resident – 30 July</b>          Could this consultation please consider how access to the rear of the Barbican Wildlife garden be reinstated via Bridgewater Square as originally was the case. At Present this access has been closed off and the only Barbican Resident street level access is from Fann Street.          For reference In the Minutes of Ben Jonson House Group AGM 13th January 2021 7pm via zoom a motion was passed relating to the Wildlife Garden Access from Ben Jonson House.</p>	<p><i>This matter is considered to be more of a management issue than having a bearing on the character and appearance of the conservation area. Therefore the response is noted.</i></p>

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		<p>The vote was passed 'on the possibility of installing a new gate in the Barbican Wildlife Garden to allow easy access from Ben Jonson House. A vote was taken and the action agreed (majority of 14).'</p>	
18	General LBMG + CA	<p><b>Transport for London – 30 July</b></p> <p><b>Re: Draft Barbican and Golden Lane Conservation Area Supplementary Planning Document (SPD) and The Barbican Arts Centre Listed Building Management Guidelines SPD.</b></p> <p><i>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter.</i></p> <p>Thank you for giving TfL the opportunity to comment on the above draft SPDs. These two documents are considered separately below.</p> <p><b>Document 1: Draft Barbican and Golden Lane Conservation Area SPD</b></p> <p><b>General comments</b></p> <p>TfL generally welcomes the SPD, which identifies the key historic features of the conservation area. From a heritage perspective, the document is comprehensive in setting out the physical characteristics of this unique area of post-war 20th century development.</p> <p>However, there is a lack of detail regarding transport in the SPD. While it is acknowledged that there are few 'streets' in the traditional sense within the conservation area, there are many transport characteristics which could be reflected upon including: walking route hierarchies, path design, accessibility, cycling infrastructure and wayfinding. Furthermore, the SPD presents a missed opportunity to guide the design and type of future transport infrastructure within the conservation area.</p>	<p><i>These extensive comments are welcomed.</i></p> <p><b>General comments</b> <i>Noted.</i></p> <p><b>Walking and cycling</b> <i>Noted. Cycling is forbidden across both estates. Section (6) of the SPD has been amended accordingly.</i></p> <p><b>Cycle hire</b> <i>Noted. Notwithstanding the listed and conservation area status of the estates, with cycling currently forbidden across the estates and thus the majority of the conservation area, opportunities to install docking stations are unlikely to arise, save for perhaps some limited on-street locations. Section (6) of the SPD has been revised accordingly.</i></p> <p><b>Beech Street</b> <i>Noted. This section has been revised in the draft SPD to reflect the present situation.</i></p> <p><b>Influencing development</b> <i>As previously mentioned, any new cycle routes and docking stations are unlikely to be acceptable for various reasons. Section (6) has been revised to refer to the recently installed Legible London totems.</i></p>

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		<p>TfL's main comments fall into the themes of walking and cycling, cycle hire, and the Beech Street Zero Emissions scheme. These are considered below.</p> <p><b>Walking and cycling</b></p> <p>Chapter 6 'Streets, Routes and Transportation' of the SPD is currently very brief and provides a broad description of the streets and routes within the conservation area. Much more information about the character of routes and paths within the area could be given. The following questions could be answered to help build a picture of the historic transport character of the Barbican, for example: Is there a hierarchy of routes within the conservation area? Are all routes outdoors, or are some internal to buildings? Are routes protected through rights of way, or could they be closed? Do paths allow for walking and cycling? Where are the key entrances into the estate for people walking and cycling, and for deliveries? Are any of these entrances significant from a character/wayfinding perspective? Are the access controls and street furniture within the estate worth highlighting? Do ramps and steps form part of the character? Are any of the adjacent streets important in terms of the link they provide between estates, for example Fann Street? Some of this information could be presented through maps to provide a more comprehensive insight into the character of the conservation area from a walking and cycling perspective.</p> <p>Furthermore, the chapter could provide guidance on the future management of walking and cycling infrastructure within the conservation area, evidenced by presenting analysis on walking and cycling routes. In particular, it would be useful to address issues of accessibility and inclusive design, and how any issues identified can be best improved to protect the area's historic characteristics while not limiting access. The use of wheelchairs and pushchairs are an important consideration here.</p> <p>Additionally, whilst no information has been included in the SPD on the provisions for cycle parking, it is possible that the level of cycle parking and cyclist facilities within the conservation area is currently low. Policy T5 of the London Plan states that</p>	

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		<p>“Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle”. The SPD should reflect on the current level of cycling provision and identify ways that cycle facilities, namely cycle parking, can be provided within the conservation area so that cycling is prioritised whilst minimising the impacts on the historic character of the Barbican and Golden Lane estates.</p> <p><b>Cycle hire</b>  The conservation area is within the TfL Cycle Hire scheme boundary and includes a cycle hire docking station on Aldersgate Street which ranks the 66th most used in London (out of 800 stations). There are also four well-used cycle hire docking stations located just outside of the conservation area boundary.  TfL is keen to continue developing the cycle hire network to support active and sustainable travel. This is particularly important in areas which rely on walking and cycling, such as the Barbican and Golden Lane conservation area where few traditional streets exist, and thus fewer options of transport are available. Therefore, the conservation area status should not prohibit the development of new docking stations, and TfL requests the City’s support in continuing to develop the TfL cycle hire network. This will help to increase the sustainable mode share within the City of London, in line with London Plan Policy T1 which requires 95 per cent of all journeys made in central London to be by walking, cycling and public transport by 2041.</p> <p><b>Beech Street Zero Emissions Scheme</b>  We are pleased to see reference to the experimental Beech Street Zero Emissions scheme in the draft SPD, which has been funded through the Mayor’s Air Quality Fund. Improving the air quality on this street is strongly supported by TfL as this is a crucial east-west link by active travel modes within the conservation area and has historically seen high levels of air pollution.</p> <p>The SPD states that there is potential to reconfigure the layout and appearance of Beech Street if the zero emissions scheme becomes</p>	

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		<p>permanent. Bus route 153 operates and stops along this road, and therefore any such changes should be made in discussion with TfL to ensure that the level of service and performance of buses through the area is maintained and/or improved.</p> <p>We would also seek a continuation of the current arrangements to allow additional bus routes to use Beech Street when a temporary diversion is required. In addition, we would also request the exemption for our Incident Response and Dial-a-Ride vehicles, so they can continue to maintain the TfL Bus Stops and provide a public transport service along Beech Street.</p> <p>Additionally, changes should conform to TfL's Zero Emissions Zone Guidance, which can be located here: <a href="https://content.tfl.gov.uk/tfl-guidance-for-local-zero-emission-zones.pdf">https://content.tfl.gov.uk/tfl-guidance-for-local-zero-emission-zones.pdf</a>.</p> <p>It is important to ensure that any potential changes to the layout and appearance of Beech Street should result in improvements mainly for those walking, cycling and using public transport, as aligned with the Mayor's Transport Strategy objectives and the Healthy Streets Approach (as set out in London Plan Policy T2). Any changes should contribute to make the street more welcoming and inclusive for all, ensuring that the street provides a more attractive and safer environment for those walking and cycling and that use of public transport remains attractive and accessible.</p> <p>TfL looks forward to further discussion with the City of London in regard to the Beech Street Zero Emissions trial scheme and any related schemes in this area.</p> <p><b>Influencing development through the SPD</b>          Whilst the SPD is useful in presenting the characteristics of the conservation area, there is little guidance as to the extent to which future development must conform to the character identified. This is particularly a concern in relation to transport infrastructure. Chapter 3 states that 'development should preserve and enhance the distinctive character and appearance of the Barbican and Golden Lane conservation area', but how this can be achieved practically for potential future transport developments such as</p>	

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		<p>cycle routes, cycle hire docking stations and wayfinding signage is unclear. It would be useful if the document confirmed that these types of development would be acceptable in the area and explained how potential impacts on the historic environment can be minimised.</p> <p>For non-transport development, we understand that existing Listed Building Management Guidelines for the Barbican area accompany this document. As these two documents are so intrinsically linked, it would be helpful if the SPD referenced these guidelines more clearly, even providing hyperlinks to the relevant sections. This would be of benefit to anyone using the document as a planning tool.</p> <p><b>Document 2: The Barbican Arts Centre Listed Building Management Guidelines SPD</b></p> <p>Whilst this document has fewer transport considerations, TfL would like to make the following comments:</p> <p><b>Public realm improvements</b></p> <p>Any improvements to public realm, including key outdoor pedestrian routes, should deliver improvements which support the 10 Healthy Streets Indicators, as set out in TfL's Healthy Streets Approach and London Plan Policy T2. These indicators help promote high-quality, accessible and safe urban design, while encouraging sustainable travel. A guide to these indicators is available here: <a href="https://content.tfl.gov.uk/guide-to-the-healthy-streets-indicators.pdf">https://content.tfl.gov.uk/guide-to-the-healthy-streets-indicators.pdf</a>.</p> <p><b>Impacts of Crossrail</b></p> <p>We are pleased that Crossrail has been considered, in terms of the changing movement patterns around and across the estate (page 30). However, the extent and impact of these changes have not been identified. Will any improvements to walking routes be required to accommodate this change in travel patterns? Also, what proportion of visitors are expected to travel to the Arts Centre using Crossrail? If a high volume of traffic is expected between Farringdon (the closest Crossrail station) and the Barbican Arts Centre, it is important to promote sustainable travel between these locations rather than visitors relying on private hire vehicle or taxi. These issues and possible mitigation measures (eg wayfinding</p>	



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		<p>strategies, walking and cycling improvements) should be identified in the document to help inform future transport development.</p> <p><b>Cycle parking</b>          Whilst the document does not include information on the current level of cycle parking provision at the Barbican Arts Centre, page 38 states that bicycle sheds used to infill external undercroft areas may cause substantial harm or loss to the listed building. Whilst this may be the case, the document should identify whether there is a need to deliver further cycle parking at the Arts Centre, and if so, how this can be achieved to avoid impacting the historic character whilst complying with London Cycle Design Standards and London Plan Policy T5. With a move towards greener travel, and the designation of a 'Zero Emission street' in proximity to the Arts Centre, adequate quantum and quality of cycle parking is essential to provide viable sustainable travel choices. This could involve converting some of the underground car parking which is accessed via Beech Street, into secure cycle parking. An assessment and strategy for existing and future cycle parking, included within the Listed Building management guidelines, is strongly encouraged.</p>	