

City of London
Local Development Framework

Supplementary Planning Documents
Eastcheap Conservation Area
Fenchurch Street Station Conservation Area
St Paul's Cathedral Conservation Area

Appendix 1 - Statement of Consultation

March 2013



The Eastcheap, Fenchurch Street Station and St Paul's Cathedral Conservation Area Supplementary Planning Documents (SPD) form part of the City of London Local Development Framework (LDF). They were published for public consultation during a six-week period from 22nd October to 3rd December 2012.

Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012 requires the City Corporation to prepare a statement setting out the persons the local planning authority consulted in preparing the SPDs, a summary of the main issues raised by those persons and how these have been addressed in the SPDs.

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

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

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

Notifications. Letters and emails containing information about the SPDs and inviting comments were sent to relevant specific and general consultation bodies. The City Corporation maintains a database of all those who have expressed an interest in the LDF, and letters or emails were also sent to all those on the list.

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

Meetings. Presentations on the SPDs were given to the following consultative groups: Conservation Area Advisory Committee.

Comments were received from English Heritage, City of London Archaeological Trust, English Heritage, City of London Archaeological Trust, the Dean and Chapter of St Paul's Cathedral, St Paul's Cathedral Access Advisor, St Paul's Cathedral Archaeologist, members of the City of London Conservation Area Advisory Committee, Westminster City Council, DP9 on behalf of Land Securities and Canary Wharf Group, Heathrow Airport Ltd/BAA Airports, Natural England, Gresham College, Southeastern Rail and Gemma Jamieson and Simon Barnes (members of the public). The table that follows summarise the comments and explain how they were addressed in finalising the SPDs.

Summary of comments and responses

CA SPD	Comment	Response
English Heritage		
All	<p>Thank you for consulting English Heritage regarding the need for Sustainability Appraisals for the Eastcheap, Fenchurch Street Station and St Paul's Cathedral Conservation Area Character Summary and Management Strategy Supplementary Planning Documents (SPDs). As the government's advisor on the historic environment and a statutory consultee in regard of the Sustainability Appraisal of plans and programmes English Heritage is pleased to assist in this screening process. Having reviewed the Screening Statements for each of the proposed SPDs English Heritage agrees with the City of London that neither of the SPDs require a Sustainability Appraisal for the reasons outlined in Appendix 1 to each of the Screening Statements. We look forward to viewing the SPDs themselves in due course.</p>	No response required.
All	<p>Thank you for the opportunity to provide comment on the draft Character Summary Supplementary Planning Documents (SPDs) for Eastcheap, Fenchurch Street and St Pauls Cathedral Conservation Areas within the City of London. As the Government's adviser on the historic environment, English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all levels of local planning.</p> <p>General comments</p> <p>We welcome the publication of the above SPDs which comprise a new wave of Conservation Area management documents, integrating character area summaries and management strategies into the planning system as SPDs. English Heritage welcomes the intention to formally adopt these documents as SPDs within the Local Development Framework (LDF), which will encourage their direct use in planning decisions.</p>	

CA SPD	Comment	Response
All	<p>The National Planning Policy Framework (NPPF) (2012), paragraph 126 states that “local planning authorities should set out in their Local Plan positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.” It continues to state that “In developing this strategy, local planning authorities should take into account:</p> <ul style="list-style-type: none"> · the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; · the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; · the desirability of new development making a positive contribution to local character and distinctiveness; and · opportunities to draw on the contribution made by the historic environment to the character of a place.” <p>The Conservation Area Character Summaries provide an opportunity to fulfil this requirement of providing a strategy for the long term management of the City’s conservation areas. As previously highlighted in our consultation responses to other conservation Area Appraisals across the City (November 2011 and February 2012) the lack of specific detail for all constituent parts of the conservation area is a missed opportunity to provide valuable area-specific guidance regarding the conservation of historic significance in planning terms.</p> <p>Doing so could be enormously beneficial to the City in giving clarity both to planning officers and developers regarding the capacity for change in each area, and how best to enhance historic character in urban design terms.</p>	<p>Comments noted.</p>

CA SPD	Comment	Response
	<p>Views We are pleased to see views and vistas in and out of the conservation area mapped for the St Pauls Conservation Area. It would be helpful for these to be similarly mapped out for the Eastcheap and Fenchurch Street conservation areas. As stated in relation to previous draft Character Area Appraisal for the City, It is also important to understand the historic significance of the views, in terms of what is seen and why? This information can then be used to identify management tools for conserving and enhance the views and their historic significance. Further Guidance on these issues is provided in English Heritage’s publications <i>Seeing History in the View</i> (2011) and <i>The Setting of Heritage Assets</i> (2011).</p> <p>Heritage Assets Plan This appears to be missing in the case of the Fenchurch Street Conservation Area Appraisal (Appendix A).</p> <p>Condition of the conservation area We are pleased to see that paragraphs have been inserted into each document to describe the condition of the character area. However, we disagree with the assertion in the second sentence of the paragraph that new development does not threaten the character of the conservation area. New development has the <i>potential</i> to harm the character of the conservation area, either when located within the conservation area itself, or as part of the conservation area’s setting. According to the NPPF, paragraph 137, “Local Planning Authorities should look for opportunities for new development within Conservation Areas and...within the settings of heritage assets to enhance or better reveal their significance”.</p>	<p>This will be rectified.</p> <p>Comment accepted. Text to be amended.</p>

CA SPD	Comment	Response
	<p>A core purpose of the Conservation Area appraisal is to provide the necessary evidence for informed design decisions which will enhance the historic significance of the conservation area. This should be reflected in paragraph 18.</p> <p>As part of this it would be useful for provide further detail on the use of English Heritage's <i>The Setting of Heritage Assets</i> (2011) as a methodology for determining impacts on historic significance arising from development in the setting of the conservation area. According to this methodology the contribution made by a heritage asset's setting to its historic significance should be identified. This then provides the basis for judgements regarding potential impacts of development.</p> <p>Conclusion We hope that these comments prove useful in finalising the Conservation Area Character Summary and Management Strategy SPDs.</p> <p>Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise in relation to this or later versions of these SPDs, and which may have adverse effects on the environment.</p>	<p>Comment accepted. Additional detail about EH guidance will be incorporated into text where appropriate.</p>

CA SPD	Comment	Response
City of London Archaeological Trust (CoLAT)		
	<p>1. The City of London Archaeological Trust (CoLAT) welcomes the opportunity to comment on the draft St Paul's Cathedral Conservation Area SPD document as part of the consultation by the Corporation.</p> <p>2. Our comments divide into three parts, concerning: (i) the text for section 18 on archaeology; (ii) the statement in the summary on p10 that the area contains 'the City's largest intact extent of area and depth of archaeological deposits remaining of the medieval and Roman City'; (iii) small points of detail.</p> <p>3. We understand that section 18 on the provisions for archaeology on development sites in the Conservation Area will be beefed up to match the revised form of this paragraph in the other similar SPD documents. We request that this is so.</p> <p>4. The statement on p10 that the area contains 'the City's largest intact extent of area and depth of archaeological deposits remaining of the medieval and Roman City' is extremely important, but it sits there by itself and is not explained further in the text. There is also no map or description of this archaeological resource, so the reader does not know where it is or its extent on the modern street map. We therefore suggest, for clarification: (i) the text should explain this a little more. On p11, at the end of the fourth paragraph, add 'The wall formed the boundary of the cathedral precinct, which attained its fullest form in the 12th century. This was a rectangular area around what is now the cathedral. It approximates to the area shown in pink on the map on p9, centred on the cathedral, and it extended to Ave Maria Lane and Creed Lane in the west.'</p> <p>(ii) you should add to the revised section 18 on archaeology specifically: 'The area of the medieval precinct of the cathedral now forms the the City's largest intact extent of area and depth of archaeological deposits remaining of the medieval and Roman City'.</p> <p>(iii) I can supply a map of the precinct for inclusion in your text or on your website if you wish.</p>	<p>Comment noted. Text will be added.</p> <p>Comment noted. Wording of text to be amended.</p> <p>Map to be requested and included.</p>

CA SPD	Comment	Response
	<p>5. Apart from these clarifications, we suggest that your statement about the significance of this large area should not stop there. What is the consequence for your management policy or strategy, beginning on p35? We suggest that since the 1990s, British conservation policy has included the belief that the preservation of archaeological monuments, at least, is a continuum with the preservation of the historic above-ground structures and environment. It is only a one-step extension of this belief to think that a block of archaeological strata of this importance, containing remains of St Paul's from the 7th century to the 19th century, and no doubt important Roman remains beneath, should be managed with particular care. Its importance arises both from the extent of the surviving strata (and depth, up to 7m in places) and from the crucial importance of the monuments within that block for the understanding of London over 2000 years. We therefore ask that you include these sentiments in your text, not necessarily in section 18. You could establish a special policy of protection for this area of strata: on p39, last line, after 'will be resisted accordingly' you could for instance add '; and this will include resistance to the erosion in any major way of the exceptional archaeological resource, which should be preserved for the future.'</p> <p>6. Some small points of detail and bibliography: p20 Condor House: surely this is now a new building, not the Pawson and Leaf. p22 Why have you left out a detailed description of Amen Court, a significant part of the Conservation Area? Either add some sentences to your description at the top of this page or make a new sub-section. The details are in Bradley & Pesvner 1997, 417–18 (a row of the 1670s, must be unique now in the City).</p> <p>Bibliography: you could add Schofield, John, <i>St Paul's Cathedral before Wren</i>, English Heritage (2011).</p>	<p></p> <p>The Pawson and Leaf facades were retained to St Paul's Churchyard during redevelopment. Carter Lane elevations are new.</p> <p>A description of Amen Court will be included.</p> <p>This will be added.</p>

CA SPD	Comment	Response
Dean and Chapter of St Paul's Cathedral, Surveyor to the Fabric		
St Paul's Cathedral	<ol style="list-style-type: none"> 1. Page 10; bullet point 1: 'ecclesiastical focus'... St. Paul's was constructed as a place where City, Church and State Power (then identified in the body of the Sovereign) were given visible manifestation. St Paul's Cathedral today continues to bridge Church, wider civic and State functions. 2. Page 10; bullet point 3: A centre of Christian worship for OVER 1400 years. 3. Page 10; penultimate bullet point: Although implicit in the list of 'trees and greenery' we suggest reference to 'ecological value' in addition. 4. Page 10: We suggest inclusion of reference to: 'The Cathedral building and the surrounding open spaces are noted for their character to attract community events and gathering – from the St Paul's Cross Sermons to the present' 5. Page 13 para 2: fact to check: We do not think that Wren was Surveyor to the Fabric before the great fire of 1666. We will confirm this point by return and suggest a redrafting of the wording if needed. 	<p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Text to be amended.</p> <p>The text states that Wren presented his first designs in 1666. This will be clarified.</p>

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	<p>6. Page 13 para 2: Would it be valuable to mention here Wren's initial proposals for re-planning the street pattern of London and the double focus of open spaces he initially contrived, which could not be realised. This might place some of the current street layout and why it remains based on the pre-fire layout in a wider context of the struggles post-fire with land-ownership and re-building which is given due weight at the end of the following para at the bottom of the page and later on Page 17, para 4.</p> <p>7. Page 14 para 1: fact check It is true that Wren is commonly cited as architect of the Old Deanery, however we believe the present scholarship suggests this is not the case. We will try to find a reference and a possible re-wording.</p> <p>8. Page 14 Para 2: fact check Construction of Amen Court 'for canons'. This also prompts a question – does the listed wall to the West of Amen Court need a mention – remnant of Newgate Gaol? The street was also a significant thoroughfare – reference to follow.</p> <p>9. Page 15 para 2: Robert Mylne (also Surveyor to the Fabric of the Cathedral 1766-1811)</p> <p>10. Page 15 para 4: fact check: As above – checking that Amen Court was built for Canons.</p>	<p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Text to be amended.</p> <p>See above.</p>

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	<p>11. Page 15 last line: 'Penrose' = should read 'F.C. Penrose (Surveyor 1852-1897)' in this first citing.</p> <p>12. Page 16 Para 1: evolution of the churchyard Would it be helpful to reference the Conservation Management Plan to the Churchyard here, which can furnish greater detail on the extensive changes. Should the Royal Charter for the churchyard have a mention, which ascribes Guardianship to the Corporation?</p> <p>13. Page 16 Para 3: Mention of the controversy over the post war planning of Paternoster here, could be made with a humorous aside to Spike Milligan's letter and parody (full reference to follow). This then sets us a conversation about the role of 20th and 21st C planning policy in the defining characteristics of the CA.</p> <p>14. Page 16 Para 5: with the construction of the Cathedral School, the road layout was moved Eastward, away from the Cathedral - although the width of this road is a</p> <p>15. Page 17 Para 1: Would it be valuable to specifically note the axial link to the South Transept of the Cathedral, to the millennium bridge and Tate Modern.</p> <p>16. Page 17 para 3: We think it would be important to refer here to the significance of the enclosing 'urban wall' of buildings along Carter Lane which defines the boundary of the CA and the space between the city fabric and the cathedral. (These buildings have a number of defined characteristics through good planning and the St Paul's heights rules, which needs to be managed carefully as changes are brought forward through development over time).</p>	<p>Comment accepted. Text to be amended.</p> <p>Comment noted. References will be added in the management strategy.</p> <p>Comment noted. Further information about Paternoster Square will be added.</p> <p>Comment accepted. Text to be clarified.</p> <p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Character analysis text to be amended.</p>

CA SPD	Comment	Response
	<p>17. Page 18 para 2: Building Heights: St Paul's heights defined by Surveyors Mervyn Macartney and Godfrey Allen. Should one also mention St Paul's Depths in this para?</p> <p>18. Page 18 final para: We think it should be of vital importance to also mention views FROM St Paul's as being significance including:</p> <ul style="list-style-type: none"> a. From the West Portico b. South and North Transepts c. Stone and Golden gallery levels. These views are significant as the roof landscape of the city is very prominent. <p>There are a number of other secondary views around the Cathedral which are not on the plan – as you say the list is not exhaustive, perhaps this is not highest priority to amend?</p> <p>19. Page 20 Para 1: We are not sure that we can agree that ALL buildings are subservient in the immediate context of the Cathedral or Cathedral property. No 5 Cheapside is one instance of a post war building that is more prominent than one might wish. Both the development at No 10 Old Bailey (which overlooks and dominates the West side of Amen Court and promised to be entirely covered in greenery) and the roof-top redevelopment of St Paul's House (on Warwick Lane to the North of Amen Court), exemplify more recent development pressures. Currently under construction, the further upwards development of No 1 St Paul's Churchyard continues this theme. Our remark here is designed to highlight the progressive and cumulative consequences of development pressures, rather than to critique particular planning decisions.</p>	<p>Comment noted. Surveyors will be named. St Paul's 'setbacks' are identified in the management strategy.</p> <p>Comment accepted. A sentence will be added. Views will be added to the map at a future date.</p> <p>Comment accepted. Text to be amended.</p>

CA SPD	Comment	Response
	<p>20. Section 6: Character Analysis: It may not properly belong in this section of the Conservation Area management strategy, but we would note here the strong contribution to the Character of the Area of the paving within and around the public realm of the Cathedral (this is especially noticeable where that paving is missing or poorly repaired to the North of the Cathedral) and also the Railings around the Churchyard (which are of course themselves designated). The history of and the significant changes to the churchyard railings is described in the Eastern Churchyard CMP.</p> <p>21. Section 6: Character Analysis: External Lighting The word lighting only appears in one place in the report. Because we do not see external lighting represented anywhere else within the document, we would suggest that the night-time appearance of the conservation area is of the highest importance and that the character, colour, balance and intensity of streetscape and building illumination deserves mention and greater focus.</p> <p>In this regard, of course the Cathedral has a strong common interest with the Corporation to see a replacement of the Cathedral floodlighting, in favour of a much more subtle architectural lighting scheme. However the success of that scheme has to be seen in the context of functional streetlighting and lighting on other buildings. We would represent that the Cathedral and other very select buildings should be the focus of the conservation area and active efforts to reduce light intensities and light pollution should be pursued. (The 'arms race' of night illumination that occurred around the Pool of London is a good example of the problem which we need to counter).</p> <p>We hope that it may be possible to include a policy with regards to enhancing the placement of architectural lighting for the cathedral on adjoining buildings, with greater subtlety and that the Corporation could support applications to do so.</p>	<p>Comment accepted. Public realm section to be expanded.</p> <p>Comment accepted. The lighting of buildings is considered as part of individual development proposals. Relevant policies are included in the draft Local Plan.</p> <p>Guidance on lighting will be added to the Environmental Enhancement section.</p>

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	<p>22. We would also mention the very poor architectural illumination of Temple Bar as also a concern. The green-tinged colour temperature of the scheme is unfortunate, as is the irregular placement and poor focus of the light.</p> <p>23. Page 22 Para 3: As referred to above, whilst we do not disagree with the description of No 7-11 Old Bailey, we have commented to the architects (Sidell Gibson) and informally to planners that the East elevation of this award winning building was designed to be completely shrouded in greenery, which it is not.</p> <p>24. Page 26 and 27: Architectural Character: Within this section, is it possible to also describe the architectural character of the Carter Lane 'city wall' buildings which (although not themselves within the conservation areas) are integral to defining the character of spaces and views between the Cathedral and the south side of Carter Lane.</p> <p>25. Page 27 para 6: We currently refer to the cross as 'a monument to St. Paul's Cross' designed in 1909 by Reginald Blomfield and paid for under the Will of Mr. H.C. Richards, KC, MP (the distinction being important as the present 'cross' commemorates the medieval open air pulpit).</p> <p>26. Page 27 para 7: You may consider it appropriate to mention the design of the new South Churchyard landscape by Martin Stancliffe.</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Text to be amended.</p> <p>Comment noted.</p>

CA SPD	Comment	Response
	<p>27. Page 28 para 4: If you will forgive the pedantry, perhaps stating ‘the majority of which were designed by Sir Christopher Wren...’ is not quite precise. One might rephrase this by saying ‘sculptural adornments incorporated into the design of his Cathedral by Wren, designed and executed by many exemplary and still renowned sculptors including....’</p> <p>28. Page 28: Architectural sculpture: You may wish to also mention here architectural sculpture within the Churchyard (catalogued within the Eastern Churchyard CMP in full) including St Thomas a Becket by Bainbridge Copnall, the monument to St Paul’s Cross mentioned above (Sculpted by Bertram Mackennal); the John Wesley monument (Samuel Manning father and son). We would also mention here the Francis Bird fragment which stands within the North Churchyard (for which a more appropriate and enduring home might be found in future).</p> <p>Page 28/29 Other features: Referencing Richard Kindersley as the author of the London memorial here and the inscriptions and superimposed cathedral plans in the South Churchyard landscape might be valuable.</p> <p>The entrance to St Gregory’s vault (1715, restored 1829) in the Southeast churchyard may also deserve mention as a prominent ‘other feature’.</p> <p>We have mentioned these above, but suggest that mention here of the Churchyard railings and the listed granite bollards under ‘other features’ of significance might be appropriate.</p>	<p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Selected items are identified in public statutory section and will be added to.</p> <p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Text to be amended.</p> <p>Comment accepted. Text to be amended.</p>

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	<p>29. Page 30/31: Open Spaces and trees. If you feel it would be appropriate, the value of the Churchyard might be more strongly represented, ecologically and for its historical and other amenity benefits. This could be achieved by reference to the above mentioned CMP. Certainly the Corporations own role in managing the churchyard deserves mention; as does the potential to enhance the open space, wherein there are a good number of detracting accretions and features which are itemised in the CMP gazetteer.</p> <p>30. Section 11: The Cathedral is aware of the unsatisfactory appearance presentation and use of the North churchyard. How this should be referenced within the spatial analysis and management policies for the CA is open to discussion.</p> <p>31. Page 31: Cultural Associations: The existence of the external pulpit of the St. Paul's Cross perhaps deserves specific mention, not least because of the association with Dean John Donne and his public preaching and other works (now acknowledged in the new sculpture).</p> <p>32. Page 35: para 1: Mention of St Paul's Depths here again may be appropriate.</p> <p>33. Page 35: Protected views: We could not suggest any better summary of the current protected views policy, which we strongly endorse. However would it be appropriate to also mention (so that there is greater awareness) that there are more local protected views with LB Islington's planning policies</p>	<p>Comment noted. A reference to the CMP will be added.</p> <p>Comment noted. A reference to the maintenance of paving will be added to the public realm section.</p> <p>Comment accepted. A reference to the external pulpit will be added.</p> <p>St Paul's 'setbacks' are referenced.</p> <p>Comment accepted. Reference to Islington's local views policies will be added.</p>

CA SPD	Comment	Response
	<p>34. Page 36: Para 3, bullet point 3: We would strongly represent that air-quality is not just an issue for human health, but also towards stonework erosion rates and soiling (a particular concern to protect the investment in the newly cleaned cathedral). See for instance R. Inkpen et al 'St Paul's Cathedral: Long term Erosion and Pollution Monitoring' or more globally the EU funded Multi-Assess pollution evaluation study (and modules related to damage within the historic environment).</p> <p>35. Para 37: Para 4: The Cathedral would strongly endorse (suitably controlled and high quality) security enhancements, which also are contrived to deliver wider benefits to the City and conservation area – including overall traffic reduction.</p> <p>36. Page 38; Para 1: bullet point 3: The Cathedral has made separate representations concerning the access/equality implications arising from closure of the coach park. We understand and support the active consideration of this issue as part of the post-project monitoring and evaluation and hope that alternative arrangements to drop off and pick up will be contrived within the area.</p> <p>37. Page 38; Para 4: Without fully understanding the Gehl model referenced here, we note that pedestrian flows around the Cathedral are perhaps only partially understood. There are pinch-points and issues of pressure (often generated by the pressure of visitors to or events in the Cathedral) which are to the detriment of both the character of the conservation area and the enjoyment people experience and amenity. We would strongly endorse further work to map these pressures and policies which seek to mitigate these impacts, which also then enhance understanding and enjoyment of the cultural riches in this quarter of the city.</p>	<p>Comment noted. This cross-references existing policies relating to air quality which do not at present refer to stonework erosion.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p>

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	<p>In this context we would also mention the long term desire for the Cathedral to promote access (including equal access) into the North and South transepts, which are now so clearly anchored by new pedestrian desire lines to North and South.</p> <p>38. Section 16: Transport: We are surprised that there is not stronger mention of the relationship between the management of highways (by TfL) and how the valued qualities of the CA are preserved and enhanced –ie the Mechanism by which highways are controlled and enhanced. Clearly a wide range of issues (signage, streetlighting, road surfaces, and overall traffic) are of strong interest for the CA</p> <p>We would also mention here the significance of operations by Statutory Utilities and other undertakers, which present archaeological issues as well as the vexed question of high quality restoration of surfaces after their activities. This is not a major problem around the Cathedral (no doubt due to the good management policies in force) but might be reinforced here.</p> <p>39. Section 17: Management of Open Spaces: Whilst not for inclusion here, you will want to be aware that the Diocese of London is embarking on a major audit of the ‘ecological assets’ of churchyards and we would like to agree for the audit of the St Paul’s churchyard to be high on the priorities (subject to funding).</p> <p>40. References: Besides the CMP’s which are now in place for the Chapter House, Cathedral School and Eastern Churchyard, perhaps the most important document which needs to cross-reference with the CA policy is the Cathedral’s 2003 overall CMP.</p>	<p>Comment noted.</p> <p>Comment noted. This is referenced in the condition of the conservation area section.</p> <p>Comment noted.</p> <p>Comment accepted. References will be added.</p>

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St Paul's Cathedral, Cathedral Archaeologist		
	<p>1. We welcome the opportunity to comment on the draft St Paul's Cathedral Conservation Area SPD document as part of the consultation by the Corporation.</p> <p>2. Our comments divide into three parts, concerning: (i) the text for section 18 on archaeology; (ii) the statement in the summary on p10 that the area contains 'the City's largest intact extent of area and depth of archaeological deposits remaining of the medieval and Roman City'; (iii) small points of detail.</p> <p>3. We understand that section 18 on the provisions for archaeology on development sites in the Conservation Area will be beefed up to match the revised form of this paragraph in the other similar SPD documents. We request that this is so.</p> <p>4. The statement on p10 that the area contains 'the City's largest intact extent of area and depth of archaeological deposits remaining of the medieval and Roman City' is extremely important, but it sits there by itself and is not explained further in the text. There is also no map or description of this archaeological resource, so the reader does not know where it is or its extent on the modern street map. We therefore suggest, for clarification: (i) the text should explain this a little more. On p11, at the end of the fourth paragraph, add 'The wall formed the boundary of the cathedral precinct, which attained its fullest form in the 12th century. This was a rectangular area around what is now the cathedral. It approximates to the area shown in pink on the map on p9, centred on the cathedral, and it extended to Ave Maria Lane and Creed Lane in the west.'</p> <p>(ii) you should add to the revised section 18 on archaeology specifically: 'The area of the medieval precinct of the cathedral now forms the City's largest intact extent of area and depth of archaeological deposits remaining of the medieval and Roman City'.</p> <p>(iii) I can supply a map of the precinct for inclusion in your text or on your website if you wish.</p>	<p>Comment noted. Text will be added.</p> <p>Comment noted. Wording of text to be amended.</p> <p>Map to be requested and included.</p>

CA SPD	Comment	Response
	<p>5. Apart from these clarifications, we suggest that your statement about the significance of this large area should not stop there. What is the consequence for your management policy or strategy, beginning on p35? We suggest that since the 1990s, British conservation policy has included the belief that the preservation of archaeological monuments, at least, is a continuum with the preservation of the historic above-ground structures and environment. It is only a one-step extension of this belief to think that a block of archaeological strata of this importance, containing remains of St Paul's from the 7th century to the 19th century, and no doubt important Roman remains beneath, should be managed with particular care. Its importance arises both from the extent of the surviving strata (and depth, up to 7m in places) and from the crucial importance of the monuments within that block for the understanding of London over 2000 years. We therefore ask that you include these sentiments in your text, not necessarily in section 18. You could establish a special policy of protection for this area of strata: on p39, last line, after 'will be resisted accordingly' you could for instance add 'and this will include resistance to the erosion in any major way of the exceptional archaeological resource, which should be preserved for the future.'</p> <p>6. Some small points of detail and bibliography: p20 Condor House: surely this is now a new building, not the Pawson and Leaf. p22 Why have you left out a detailed description of Amen Court, a significant part of the Conservation Area? Either add some sentences to your description at the top of this page or make a new sub-section. The details are in Bradley & Pesvner 1997, 417–18 (a row of the 1670s, must be unique now in the City).</p> <p>Bibliography: you could add Schofield, John, <i>St Paul's Cathedral before Wren</i>, English Heritage (2011).</p>	<p></p> <p>The Pawson and Leaf facades were retained to St Paul's Churchyard during redevelopment. Carter Lane elevations are new.</p> <p>A brief description of Amen Court will be added.</p> <p>This will be added.</p>

CA SPD	Comment	Response
St Paul's Cathedral, Access Advisor		
St Paul's	<p>This document is a response to the invitation to consider the St Paul's Conservation Area SPD, with its related 'Equalities Impact Assessment', published for consultation by the Corporation of the City of London. It has been prepared by John H. Penton, Accessibility Adviser to the Dean and Chapter.</p> <p>1 Preamble</p> <p>The response set out below is based upon a detailed review of the Corporation's Conservation Area SPD, in the particular context of the conclusions reached in the accompanying 'Equalities Impact Statement' (EqIS). It is assumed that this latter document was produced in response to the provisions of the Equalities Act 2010 (EqA), and in order for the Corporation to address its obligations in relation to the 'Public Duty' placed upon it under those provisions.</p> <p>2 'Equalities Impact Statement'</p> <p>The format of the document follows the pattern laid down by the Equality Act, 2010 (EqA), and records that "the City has defined the following equality target groups". The listing of those groups specifically includes :-</p> <ul style="list-style-type: none"> <input type="checkbox"/> older people <input type="checkbox"/> disabled people <p>The document goes on to define 'negative', 'positive' and neutral impacts. In defining a 'negative' impact it describes it as disadvantage(ing) one or more equality target group. A 'neutral' impact is seen as occurring when a policy has a similar impact on all groups. In response to ten key questions the document identifies 'the main activities of the policy', 'who will be affected by the policy', 'what outcome' is sought', and 'who are the main beneficiaries'. The schedule of conclusions which follows suggests that the effects of the policies covered by the St Paul's Conservation Area SPD are neutral in respect of all groups, including older and disabled people. It goes on to propose that no policy has any negative impact on any of the equality target groups.</p>	<p>Comments noted. The EQIA was prepared in line with advice at the time. When the SPD is next reviewed the EQIA will be re-drafted and published for consultation. City of London procedures for the production of EQIAs is currently under detailed review, and these comments will inform that process.</p>

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	<p>The document is arranged in two parts - Character Summary and Management Strategy. The first part is historically and factually descriptive and is not contentious. The second part however would appear to be based upon some assumptions. It does not go into detail in its appraisal of the users and occupants of the Conservation Area, and appears to underplay the magnetism of the Cathedral in generating 'people flows' into the area. and the resulting patterns of movement, as, for instance in the case of the huge pedestrian flows across the Millennium Bridge toward the South Transept of the Cathedral. There is little appraisal of the effects of the relatively new patterns of pedestrian movement from Paternoster Square toward the north side of the Cathedral, or from the even newer huge retail complex in New Change to the east.</p> <p>/2 In Section 15. Environmental Enhancement (p36), it sets out seven 'principles which provide the City's vision of the City's streets'.</p> <p>Those principles include:-</p> <ul style="list-style-type: none"> <input type="checkbox"/> Rationalize street furniture <input type="checkbox"/> Improve the <i>pedestrian</i> experience <input type="checkbox"/> Enhance paving and surfaces <input type="checkbox"/> Create an <i>inclusive</i> environment <p>Whilst stating these <i>principles</i> the document does not, in our view, identify the significance of seating, the placement of bollards, the positioning of street and spatial lighting, and the location and design of signage and information. We would want to stress that the definition of '<i>pedestrian</i>'(s) also includes people with mobility related disabilities, including stick, crutch and wheelchair users. We would want to draw close attention to the nsuitability for people with such difficulties of the existing paved surfaces, particularly in the north churchyard, or the significant hazards created by the inadequacy of kerbs and path edgings in the landscaped areas of the north and east churchyard. We would wish to identify and seek cknowledgement of the real challenges currently present in the environment of the immediate surroundings of the Cathedral. This is an issue for Londoners and visitors generally, not just for users of the Cathedral. For many older and disabled people we would suggest that the context can be hostile, and in places hazardous, difficult to navigate, comprehend and uncomfortable to be use.</p>	<p>Comments noted.</p>

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	<p>In our view the document is least successful when it refers to the closure of the former coach park on the south side of the Cathedral in order to form the new extension of the Festival Gardens. The Cathedral would not dispute that the new green space is a pleasing addition to the landscaped area around the Cathedral and this has been a very successful addition and enhancement to the setting of the Cathedral. However in closing the coach park the project has also removed the <i>only</i> designated ‘set down-and- pick-up’ point for drivers of people with disabilities in the <i>immediate vicinity of the Cathedral</i>. Groups of disabled visitors to the Cathedral, who used to be set down in the coach park near to the accessible entrance in the south transept, where the lift and accessible entrance to the Cathedral is located, can no longer get out of their vehicle in that area, and have to make a much longer, exposed journey, (over inappropriate surfaces) to reach the building. . The Cathedral understands that the Corporation are now undertaking a post-project audit of the gardens project. We have highlighted our concerns over the resulting difficulties for access to the Cathedral (and other buildings in the locality) in a number of important ways. We hope to work with the Corporation and look forward to taking an active part in the project review. For the purpose of the Conservation Area management strategy, we would want to make a strong representation that this issue is referenced for early action within the SPD. We suggest that there should be reference in the document to ‘visitors’. The Cathedral alone attracts nearly 2 million visitors each year. Many come from overseas, many have disabilities as defined by the Act (EqA) and even more are older people. For many American veterans, a significant proportion of whom are stick or wheelchair users, for instance, St Paul’s is a place of pilgrimage to visit the American Chapel at the east end of the Cathedral. Most visitors arrive as pedestrians, and the Dean and Chapter have been engaged over the last twelve years in carrying out an ‘on- going’ programme of works to improve the accessibility of the building. The Corporation is represented on the working group responsible. The Cathedral intends to continue to actively engage with the wider implications of the EQa and address the practical and organizational implications of increasing numbers of people with disabilities visiting the Cathedral, in partnership with the city. It is noteworthy too that the former Choir School in Carter Lane is now used as the only accessible Youth Hostel in central London. /6 In section 16.</p>	<p>Comments noted.</p>

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	<p>Transport (p38) the document states that “as motor vehicle through traffic is further reduced, opportunities to enhance the environment for edestrians and cyclists to move and linger and to enjoy the spaces will <i>further</i> increase.” Whilst the needs and preferences of cyclists are robustly asserted, the Cathedral would wish to draw attention to the needs and preferences of people with impaired mobility, and of wheelchair users in particular. In proposing to <i>increase</i> enhancement of the nvironment the document assumes an existing level of satisfaction for the ‘all- embracing’ category of <i>‘pedestrian’s</i>. As we have noted above, in the case of ‘pedestrians’ with impaired mobility there are challenges that still need to be addressed.</p> <p>/7 In the extensive list of Further Reading and References (p40) it is noteworthy that there are few references to ‘Inclusive Design’, the design of external spaces to meet the needs of people with impaired mobility nor the environmental implications of the Equality Act (EqA). We would commend English Heitage’s standard work ‘Access to the Historic Environment’ as a key resource. We hope that widening the bibliography will assist in demonstrating the current technical and cultural awareness of the environmental needs of older and disabled people in the lanning Department of the City Corporation.</p> <p>CONCLUSIONS in terms of the consultation process the Cathedral would commend the following key matters:</p> <p>1 The Equalities Impact Paper, and its conclusions could be more robustly evidenced and reflect actual and known concerns.</p> <p>2 The rigour of the St Paul’s Conservation Area SPD would be enhanced by differentiation of <i>‘pedestrians’, as a group and inclusion of reference to ‘visitors’, ‘older people’, and ‘people with disabilities’.</i></p> <p>3 The Cathedral would welcome further dialogue with the Corporation and involvement in the enhancement of the wider and immediate context around the Cathedral, particularly with regards to the re-provision of accessible pick up and drop off arrangements for this area of London.</p>	<p>Comments noted.</p> <p>Comment accepted. Appropriate references will be added to the document.</p>

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DP9 on behalf of Land Securities and Canary Wharf Group		
Eastcheap	<p>On behalf of our clients, Land Securities and Canary Wharf Group, we hereby submit these representations in relation to the Eastcheap Conservation Area SPD consultation.</p> <p>Our clients are the owners and developers of the 20 Fenchurch Street tower scheme located to the south of Fenchurch Street. The scheme has been under construction since {confirm} and is due for completion in {confirm}. The development is located immediately to the north and the east of the conservation area.</p> <p>Page 15 of the document refers to buildings outside the conservation area and the larger taller nature of these. We feel that this section should expand further on this point particularly in relation to the 20 Fenchurch Street building. This building, though still under construction, has a significant impact on the conservation area and the context of the historic Eastcheap and Philpot Lane buildings. Much of the conservation area would be viewed with this building in the context and we feel it is pertinent to mention it by name at this point.</p> <p>In addition, the following section refers specifically to views within the conservation area. View 2, 8, 10 and 11 would all likely feature 20 Fenchurch Street prominently and should refer to the presence of this building.</p> <p>The Character Analysis section presents further detail on the type and nature of the buildings on Philpot Lane and Eastcheap. We suggest that this section should refer to the backdrop of the uncompromisingly modern 20 Fenchurch Street tower and the juxtaposition of this design with the Victorian warehouse designs.</p>	<p>Comments accepted. 20 Fenchurch Street was not built when the SPD was drafted. A reference will be added.</p>

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Paul Taylor, Bridge Ward, Conservation Area Advisory Committee (CAAC)		
All	<p>I am a member of CAAC and and I went in that capacity this afternoon to look at the draft Conservation Area documents in Guildhall Library. May I say how well they look even in draft form and await expectantly to receiving the final editions in due course.</p> <p>There are three points I wish to raise:</p> <p>1 Have you ever considered adding the Ward boundaries to the maps?</p> <p>2 I was very pleased to see the entries to the City plaques. Have you considered adding Parish Boundary marks?</p> <p>3 I am partially colour blind and have difficulty with red and greens. As a consequence I find the two colours that illustrate Grade I and Grade II structures in Appendix A difficult to distinguish. The blue for Grade II* is fine. Has this point ever been raised with you?</p>	<p>Comment welcomed.</p> <p>They will be added if possible.</p> <p>There is currently no record of existing parish boundary markers. This will be considered as a future project.</p> <p>The colours are those used across all mapping systems. An alternative will be considered.</p>
Peter Luscombe, CAAC		
All St Paul's Cathedral	<p>I have read the draft Conservation Areas documents currently out for consultation and find them informative and I believe they will help developers understand the concerns for these areas of the City. My only concern is one that I believe is not intended to be addressed in the present exercise and that is the boundary of the St Paul's Conservation Area. This does not embrace all the buildings immediately surrounding the Cathedral which form the backdrop to it. I consider this to be unacceptable when dealing with what is surely one of the most important buildings in Great Britain and of world significance. This omission applies to most buildings on the North, East and South sides of the Cathedral. It is of particular relevance at the moment as I understand that the freestanding octagonal building above St Paul's underground Station is being considered for re-development in the near future. This building which forms the foreground to the views of the Cathedral from the West end of Cheapside is not in the Conservation Area as currently defined which I believe reinforces the point that I am making.</p>	<p>Comment noted. The boundary will be considered as part of a periodic review, in approximately five years.</p> <p>The setting of the cathedral and conservation area are a consideration in any development proposal.</p> <p>Comment accepted. Views from the west end of Cheapside to the Cathedral will be identified and added.</p>

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Simon Barnes		
St Paul's Cathedral	<p>I would like to make the following observations on the Draft St Pauls Conservation Area Plan:</p> <p>As an initial obseration the plan seems quite weak on what is proposed, as opposed to the very relevant synopsis of the current characteristics of the plan. This may just be due to how these things are structured, but, I am surprised there is not more on how to protect the area going forward. Of a particular interest to me is Air Quality. This impacts health and wellbeing as well as physically damaging buildings and the requirement and cost of ongoing cleaning. I think the plan is very weak in this area. Air quality and traffic management will form a vital part of the area in the future.</p> <p>What is the strategy of the City of London to deliver better air quality or is it reliant on the mayor to achive this? Particulates emissions from diesel vehicles will damage buildings and health. Should a strategy for a conservation area not have specific targets to reduce PM emissions?</p> <p>Can the plan better explain how air quality can contribute to the physical and health of the area?</p>	<p>Comments noted. References to relevant policies and strategies relating to air quality will be strengthened or expanded where appropriate.</p>
Gemma Jamieson		
St Paul's Cathedral	<ol style="list-style-type: none"> 1. A historical area of interest which needs to be carefully maintained, with buildings of different fabric from different centuries. 2. Care needs to be taken with gardens and mature trees, particularly with climate change and flooding. 3. To reduce the impact of motor vehicle traffic, and have more walkways and paths. 	<p>Comments noted.</p>

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Westminster City Council		
St Paul's Cathedral	<p>Thank you for consulting the City of Westminster planning policy team on your three most recent conservation area summaries. It is always a pleasure to read and respond to conservation area appraisals from neighbouring authorities. As none of the conservation areas in question immediately adjoin Westminster, the only impacts on Westminster from these three documents relate to views. As the St Paul's SPD identifies, St Pauls forms the focus of several LVMF views, one of which (no. 8, Westminster Pier) originates in Westminster.</p> <p>St Paul's cathedral is also the focus of two of Westminster's draft <i>metropolitan views</i> (locally identified views of metropolitan importance); the views of the dome of St Paul's from the terrace of Somerset House and from Victoria Embankment. Metropolitan views are referenced in Westminster's Core Strategy and in our Draft Metropolitan Views guidance. They will also be the subject of more detailed development management policies in our forthcoming local plan.</p> <p>We would hope that the City of London would consult the City of Westminster on any development proposals which would have an impact on either of these metropolitan views or on LVMF view no. 8, and would consider the impacts on these views in the development management process. An additional line in the Management Strategy SPD to this effect would be welcomed.</p> <p>Development in seven other City conservation areas also has the potential to impact on these view corridors. A reference to Westminster's metropolitan views would be welcome when conservation area management strategy SPDs are prepared for Temples, Whitefriars, Bow Lane, Guildhall, Bank, New Broad Street and Bishopsgate conservation areas.</p>	<p>Comment noted. A reference to Westminster City Council's Metropolitan views will be included in the management strategy.</p> <p>Comment rejected. Given the large number of Metropolitan Views identified by Westminster City Council and other adjoining Boroughs in their own SPD's a blanket consultation on smaller schemes within the City in the backdrop of these views would be too onerous.</p> <p>Comment noted. This will be done.</p>

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Heathrow Airport LTD / BAA Airports		
	<p>The safeguarding requirements for Heathrow Airport includes a circle with a 30 kilometres radius drawn from the aerodrome reference point to indicate the area within which the Planning Authority must consult the Airport Operator on proposed wind turbine development. This recognises the fact that the introduction of wind-powered generator turbines as an alternative energy policy can create problems for aviation. In addition to their potential for presenting a physical obstacle to air navigation, wind turbines can affect radar and other electronic aids to air navigation from radio frequency interference (the rotating blades create electromagnetic disturbance which can degrade the performance of these systems and cause incorrect information to be received). The amount of interference depends on a number of factors; the number of turbines, their size, construction materials, location and shape of blades. A wind turbine development is also likely to be the subject of consultation with the Civil Aviation Authority (CAA), NATS En Route Ltd. (NERL) and the Ministry of Defence (MOD).</p> <p>Government advise* applicants to initiate discussions with the Planning Authority and the Airport Operator at an early stage in the process and before submitting an application to ensure that they understand the constraints and provide the information to enable a detailed assessment to be made of the proposed development i.e. a navigational impact assessment study. Where it is determined that a planning application for a proposed development may have an effect on navigational or other aeronautical systems, simulation or other types of interference modelling of the effects of the development may need to be conducted before a decision can be made on the application. It is usual for the developer to bear the cost of the modelling.</p>	<p>No response required. The conservation areas do not fall within the Heathrow Airport safeguarding zone.</p>

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	<p>Within the safeguarding zone around Heathrow Airport shown on the official safeguarding map published to each council. , wind turbine development will be permitted that demonstrates for the duration of the construction period and during operation it will not adversely affect the operation of Heathrow Airport or the navigational aids, communication or surveillance equipment used for air navigation at Heathrow Airport.</p>	
Natural England		
	<p>Thank you for your consultation on the above, which were received by Natural England on the 19 October 2012. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. The consultations which we have been offered the opportunity to comment on are of a low risk/priority for Natural England and so we will not be offering representations at this time. The lack of further comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may be able to make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of areas affected by this plan in the decision making process.</p>	<p>No response required.</p>
Gresham College		
	<p>Thank you for your recent letter, letting us know about current conservation area management strategies. Gresham College is generally supportive of the proposals but is not in a position to comment in detail on the strategies, since the direct impact on the College would be minimal. We would be pleased to remain on the list of consultees. We understand our comments above may be made public and have no objection to this.</p>	<p>No response required.</p>
Southeastern Rail		
	<p>Please accept this email as confirmation that none of the areas you are consulting fall within the Southeastern stations areas.</p>	<p>No response required.</p>

