

Response to the Consultation on the Barbican and Golden Lane Conservation Area on behalf of the Golden Lane Estate Residents' Association

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EXECUTIVE SUMMARY

- The City of London does not appear to have followed best practice as set down by Historic England for appraising the proposed Conservation Area.
- Parts of the proposed Area have not been included/appraised. This may be in contravention of The Planning (Listed Buildings and Conservation Areas) Act 1990.
- No satisfactory reason has been given why the proposed Area has been divided into zones and not taken as a whole. This division appears to go against Historic England's guidelines.
- The appraisal of each zone has not been carried out to Historic England's recommendations of best practice.
- The appraisal of each zone appears to have been carried out against a checklist which is not applicable when considering a Conservation Area as a whole.
- All of the area clearly meets the criteria set out in Historic England's Advice Note 1 for the setting up of a conservation area.
- The area as proposed by GLERA should be adopted as a whole or an independent historical and architectural appraisal be carried out to justify the area.

BACKGROUND

1. The Planning (Listed Buildings and Conservation Areas) Act 1990 is the current legislation relating to Conservation Areas and states that:

1) Every local planning authority—

(a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and

(b) shall designate those areas as conservation areas.

2. Demolition of buildings, certain alterations and works to trees and landscape features are controlled in Conservation Areas.
3. Timothy Godsmark on behalf of the Golden Lane Estate Residents' Association wrote to the City of London on 7th September 2016 requesting them to consider setting up a Conservation Area covering the Golden Lane Estate, the Barbican and associated areas. The reason for this was the number of new developments around both Estates which were generally thought to be inappropriate by the community.
4. The proposed Conservation Area was supported by over 700 people in a petition.

5. The City of London's Planning Department carried out an assessment of the area. They divided the proposed area into five zones and marked these against what they claimed to be nationally established criteria. The result of this exercise was to only support two zones which followed the listed buildings outlines of the two estates.
6. Considered as a totality this area is of special architectural and historical interest. As such, it is desirable to preserve or enhance the character and appearance of this area, which includes the area surrounding and adjoining the Barbican and Golden Lane Estates, two hugely significant Grade II and Grade II* -listed post-war projects by the architectural firm of Chamberlin, Powell and Bon, together with the Jewin Welsh Church, Bernard Morgan Section House, Cripplegate Institute and the Church of St. Giles Cripplegate (amongst others). This site lies on the northern edge of what was once Roman Londinium, illustrating the sense of rich history within the site, which also illustrates the prevailing ideas of post-war urban and architectural design and townscape through the work of Chamberlin, Powell and Bon. The special character of this area does not come only from the quality of the buildings contained within it. Elements such as the historic layout of roads, paths and boundaries, landscaping and green spaces and characteristic building and paving materials within the site all contribute to the familiar and cherished local scene.

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7. It is clear from The Planning (Listed Buildings and Conservation Areas) Act 1990 that there are no legally established criteria for assessing Conservation Areas. In fact they are to be assessed on criteria suggested by Local Authorities.

The City Planners have referred to Historic England's Conservation Area Designation, Appraisal and Management Historic England Advice Note 1 as setting down the criteria for assessing the proposed Conservation Area. This document gives a number of ways in which Conservation Areas can be identified through different types of special architectural and historic interest namely:

- Areas with a high number of nationally designated heritage assets and a variety of architectural styles and historic associations.
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- Where an earlier, historically significant, layout is visible in the modern street pattern.
- Where a particular style of architecture or traditional building materials predominate.
- Areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of parks and gardens of special historic interest

The checklist approach that the City has followed is based on the checklist set out in Table 1 of Historic England's Advice Note 1 however this checklist is meant to be a means of identifying specific elements of an area that contribute to its designation not criteria for appraising areas as a whole. Advice Note 1 in fact says that a full appraisal

should be carried out including location and setting, historical development, architectural quality and built form and open space, parks, gardens and trees.

There is no evidence that these criteria have been fully taken into account and we believe that the assessment of the proposed area would be very different if the appraisal had been properly carried out.

8. The proposed area has been divided into five zones. We do not understand the reason for this because, as Advice Note 1 states:

Discernible character areas or zones are often evident in larger conservation areas and may already have been defined using a historic characterisation approach such as Historic Area Assessment. They may reflect the predominant historic character that survives from earlier periods or the original function, class distinctions, design or current uses (e.g. residential, industrial, commercial, civic or transport-related). The sub-areas may overlap or have 'blurred edges', for example where a 19th century development is partly on historic urban plots and partly in former fields, creating 61 'zones of transition' between areas of consistent character.

The area under consideration was heavily bombed in World War 2 and was redeveloped in the 30 to 35 years after the war. Because of this, although the architectural styles of individual buildings and developments may vary the predominant character of the architecture is post-war modernist. Before the war the land usage was also fairly consistent with light industry and railway marshalling yards.

We can find no evidence that there are sufficient differences in character or historical association across the proposed Area to suggest or support its division into zones.

Even if the division in to zones were supported, Zone 2 fits the criteria of a blurred edge as indicated in the passage above and should be included.

9. Some areas to the north and east of the Golden Lane Estate which were included in the request to consider a conservation area have not been included in the zones and do not appear to have undergone any form of appraisal.

These areas form part of the boundaries of the Estate and should therefore be included as part of the curtilage of the listed buildings. They are important to the setting of the listed buildings and the proposed Conservation Area and include mature trees to the space to the north of Hatfield House, garages to the north of Basterfield House, contemporary with the Estate, and the wide pavement to the east of Stanley Cohen House. No explanation is given why they were not appraised.

10. The area between the Estates (Zone 2) is an area of small streets and open spaces, Bridgewater Square and the Barbican Wildlife Garden. Both are the remnants of the pre-World War 2 street pattern and in the case of Bridgewater Square an area with a long and distinguished history having been laid out by Sir Christopher Wren on the site of Bridgewater House. When it was a garden square it had a number of notable residents before the centre of fashionable London life moved west.

Both of the open areas are important areas of ecological diversity and contain mature trees, works to which would be protected by the conservation area designation.

The area also contains a notable survivor of the World War 2 bombing and the Welsh Church which is a significant building by the notable church architects Caroe and

Partners and is a good example of the often undervalued Scandinavian style of modernism.

We see no good reason why this area has been excluded but many why it should and it is crucial to the setting of both Estates.

11. Zone 5 is the area to the south of the Barbican and contains the Museum of London Building and bastion by the significant post war architectural practice of Powell and Moya, open landscaped spaces containing important archaeological remains and several livery halls. All these elements meet the criteria of architectural and historical significance and again there is no good reason why this zone should not be included.

We are aware of the proposal to replace the Museum with a new concert hall and although GLERA does not have a policy on this we feel that it is important that the proposals should be properly considered in the context of the adjoining Barbican and the designation would reinforce this.

CONCLUSION

The submitted proposal for the Conservation Area was intended to preserve the character and setting of the area and not just the listed building which have their own protections. The limiting of the area to the boundaries of the listed buildings emasculates the protections afforded by a conservation area and leaves the areas not included open to inappropriate development.

The City has not followed best practice or the legislative requirements in appraising the proposed area and we ask that the proposal be approved as a whole or a proper independent historical and architectural appraisal be carried out before the size of the Conservation Area is finalised.