Dear Ms Delves,

43 FARRINGDON STREET, 25 SNOW HILL, 29 SMITHFIELD STREET, LONDON, EC1

Thank you for your recent letter notifying English Heritage of the above application. We have assessed the proposals in detail, following consideration at pre-application stage by our London Advisory Committee (May, 2012), and I can now set out English Heritage’s response as follows.

Summary
The Smithfield Western Market Buildings (General Market Building, Annex Market Building, Red House Cold Store and its ancillary former Engine House) are significant unlisted buildings that make a positive contribution to the character and appearance of this part of Smithfield Conservation Area. They have been unoccupied for many years and are currently in poor condition. The proposals seek to retain and restore the most significant elements of the historic market buildings whilst providing new office floors at the centre of the General Market Building and Red House. Whilst the scale and height of the new office floors will result in moderate harm to Smithfield Conservation Area in certain views, the proposals have the potential to deliver economic, social and heritage benefits. In accordance with national and local planning policy, these benefits will need to be balanced against the harm to the historic environment arising from the development.

English Heritage Advice
Our statutory remit is the impact of the proposals on the significance of the historic environment. Our advice below is based on an understanding of the historic environment affected by the proposals, and an assessment within the context of national and local planning policy as to whether the proposals harm, retain or enhance this significance, and whether there are public benefits that may outweigh any harm.

Significance of the Historic Environment
Smithfield Conservation Area is highly significant for its concentration of historic...
buildings and infrastructure relating to three great institutions founded during the
medieval period: the Priory of St. Bartholomew the Great; St. Bartholomew's Hospital;
and the meat markets. Smithfield Market remains the most significant working market
complex in central London and represents the longest running and largest wholesale
meat market in Europe.

The character of the market part of the conservation area is dominated by the
continuous group of market buildings between Farringdon Street to the west and
Lindsey Street to the east, which together occupy a footprint of around four hectares
and a frontage of around 400 metres. Despite its size, the market retains a human
scale due to the low heights of its buildings and their varied and articulated elevations.
The surrounding Victorian planned streets are rectilinear and wide, providing the area
with a strong sense of openness that is in appealing contrast to the more typically
narrow medieval streets that converge at the market from the north and south. The
underlying topography of the area is still recognisable, with the market buildings
stepping down as the land falls to the west towards the River Fleet, which is now
underneath Farringdon Road/Street.

The Smithfield Western Market Buildings are unlisted, but nonetheless make a strong
positive contribution to the western part of Smithfield Conservation Area. The
architectural language of the individual buildings varies between and within the French
and Italian Renaissance styles, but there is a clear consistency to the group through
similar scale, decoration and the use of deep red brick combined with stone detailing.
The Annexe Market, designed by Horace Jones in 1888, is considered to be the best
preserved and architecturally most significant of the Smithfield Western Market
Buildings, despite lacking the degree of special interest to merit listing. It is confident in
its design and well executed in its detailing, which includes arcaded walls, ornamental
ventilation grilles and pedimented gateways. The Annexe Market is part of a larger
complex that includes the former Red Brick Cold Store from 1898 by the architects
Reeves & Styche. The imposing red brick facades of the Red House complete the
block to the east and south.

Jones’s 1881 General Market Building, despite its many significant features, is a
somewhat less successful architectural composition overall due to its much larger
footprint and long frontage to Farringdon Street. The building was also compromised
by wartime damage, which destroyed Hart’s Corner and the central lantern over the
market hall, and by the encroachment of the 1963 Poultry Market canopy, which
physically damaged and permanently obscured much of the General Market Building’s
east elevation.

Notwithstanding their relative individual merits, all of the Victorian Western Market
Buildings possess strong historical value for their role in illustrating the massive late
19th century transformation of this area into ‘modern’ markets served by an extensive
rail and road infrastructure. The fact that two of the buildings were designed by one of
Britain’s more reputable Victorian architects (Horace Jones) adds further weight to the
historical value of the site. The buildings are also of considerable aesthetic value for
their highly decorative red brick architecture and the way this succeeds in integrating very large footprint buildings into the surrounding townscape, and possess a degree of communal value for their role within the local meat trading community. Until the buildings were taken out of use in the 1990s, they were affectionately referred to by Smithfield meat traders as 'the village'.

Impact of the proposals on the historic environment
The current proposals combine the restoration of existing fabric with the addition of a substantial amount of new development to the site.

On the General Market site, the existing Victorian perimeter buildings along Farringdon Street, Charterhouse Street and West Smithfield will be retained in full and restored. The damaged elevation along West Poultry Avenue will be partially demolished at ground floor level and replaced with appropriate period shopfronts, with the concrete canopy of the Poultry Market removed where it meets the General Market. The post-war Hart’s Corner block will be removed to create an open entrance and new public space leading to the centre of the market, which will be occupied by a mix of restaurant and retail units. Above this, a new structure containing offices will rise above the retained perimeter Victorian buildings, from one storey above at the western part to three storeys above at the eastern part of the site. The new building will also encompass a terrace level that will connect to the rear of the restored upper floors of the retained Victorian buildings. The flat roofs of the new building will be planted with green roof gardens.

The facades of the former Red House Cold Store along West Poultry Street and Smithfield Street will be retained and restored, with some minor modifications applied to existing openings. A new seven storey office building will be constructed behind the facades, with its top storey set back but rising well above the height of the imposing Victorian gable wall which originally formed the entrance to and contained the former cold store fronting West Poultry Street.

The Annex Market will be substantially restored in its present form and given over to a variety of retail, restaurant and café uses in a traditional market setting. The early 20th century timber bridge between the Annex and General Market buildings will be retained and restored. The small triangular Market Porters’ Lavatory block, which previously formed part of the Engine House to the Red House Cold Store, will be restored and modified to accommodate a small retail unit.

Materials for the new elements of the scheme vary across the site. The new building above the General Market Building uses weathering steel as a frame, with glazing between. The new building above the Red House Cold Store combines glazing with a frame of black anodised aluminium.

The impact of the new development at the General Market Building on the wider historic environment will be apparent in certain views from within and near the
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conservation area. In most ground level views, the new development will appear as a backdrop to the restored historic perimeter buildings (or to the Poultry Market in the view from West Smithfield), which will continue to visually dominate the area when experienced at ground floor level. The reinstatement of appropriate period shopfronts and canopies along all of the historic facades will strengthen the presence of these perimeter buildings and enhance their contribution to the conservation area.

In the high level view from Holborn Viaduct, the new extensions will be clearly visible above the market buildings, stepping up to the east. The new development has been designed in form and materials to defer as far as possible to the Victorian character of the General Market Building, but the amount of new development rising above the old is such that some visual tension will be apparent in the view. Depending on the exact viewpoint, the listed Poultry and Central Market buildings further east will be partially or fully obscured by the new development. In our opinion, the height and scale of the new parts of the General Market Building will cause some harm to the significance of the conservation area as experienced from this particular view.

The new extensions to the General Market Building will have a substantial impact on the local view towards the site from Charterhouse Street. Here, the highest portion of the extension is in full view, and there is an uncomfortable contrast in height between the new building and the restored Victorian range. The introduction of new development of a much larger scale interrupts the relative consistency of the built form of the market buildings from east to west. The abrupt increase in scale at the eastern end of the General Market Building causes some harm to the conservation area.

The abrupt change in scale will also impact upon the setting of the grade II listed Poultry Market. However, the Poultry Market itself is a very large and robust building with a very plain exterior, and the harm to its setting by the new development is considered modest.

The loss of the large open space that currently exists at the centre of the General Market is regrettable, but this is somewhat mitigated by the provision of new, albeit smaller, public space at the centre of the site as part of the current proposals.

The design approach for the former Red House Cold Store and Annexe Market is to retain and celebrate the significant architectural elements of the buildings, in this case their red brick facades and most of the original interior and roofs of the Annexe Market. Accordingly, these Victorian elements will be repaired, restored and cleaned.

A new office building of seven storeys is proposed for the site behind the retained facades of the former Red House Cold Store and incorporating the site of the modern document store building. Because of its height, the new development will appear dominant above the retained Victorian façade of the former Red House Cold Store in the local view looking west from West Smithfield. The new building also appears visually dominant in the view from Snow Hill, where it abruptly rises above and towers.
over the single storey elevations of the Red House Cold Store elevations and the adjacent Annexe Market, causing harm to the setting of that building and this part of the conservation area.

Overall our assessment is that the proposals cause moderate (less than substantial) harm to the conservation area as a whole given the degree of repair and restoration balanced with the negative aspects set out above.

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Policy
Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) sets out the obligation on local planning authorities to pay special regard to preserving or enhancing the character or appearance of conservation areas and to preserving the settings of listed buildings.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are mutually dependent and should not be taken in isolation; and that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

Paragraph 7 of the NPPF states that the environmental role of a development includes protection and enhancement of the historic environment, while section 12 sets out how the historic environment should be conserved and enhanced.

Paragraph 131 states that, in determining planning applications, account should be taken of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; their potential to positively contribute to sustainable communities including economic vitality; and the desirability of new development making a positive contribution to the historic environment's local distinctiveness.

Paragraph 132 gives great weight to conserving heritage assets in a manner appropriate to their significance, noting that significance can be harmed by development within the setting of a heritage asset.
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Paragraph 138 advises on the loss of a building (or other element) which makes a positive contribution to a Conservation Area, and states that this should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134.

Paragraph 133 advises that, where a development would lead to substantial harm to or total loss of significance of a heritage asset, consent should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that all of the following apply: that the nature of the heritage asset prevents all reasonable uses of the site; no viable use of the asset can be found in the medium term through appropriate marketing; conservation through grant funding or charitable or public ownership is not possible; the harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 134 sets out that, where a development proposal will lead to less than substantial harm to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Paragraph 137 states that local authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance.

The London Plan sets out the Mayor’s commitment to protect and enhance London’s historic built environment, to promote conservation-led regeneration, and the re-use of redundant or underused buildings. It also sets out policies with aim to support culture and tourism and economic and social regeneration.

The City of London’s 2002 Unitary Development Plan (UDP) is in the process of being replaced, but some policies relevant to the current proposals will remain in place until the Development Management Development Plan Document (DPD) is adopted. These include ENV 11, which reflects the City’s statutory duty to ensure that new development preserves or enhances the character or appearance of conservation areas, and ECON 6, which seeks to maintain the varied and special character of the Smithfield area.

The City of London’s Core Strategy, which was adopted in September, 2011, is one of the documents (along with the Development Management DPD) that will make up the City’s Local Plan. Until that document is adopted, applications for planning permission will be considered against the policies in the Core Strategy, the London Plan and the relevant saved UDP policies.

Strategic Objective 3 in the Core Strategy is: ‘To promote high quality architecture and street scene appropriate to the City’s position at the historic core of London, complementing and integrating the City’s heritage assets and supporting the continued
development of the City as a cultural destination for its own communities and visitors’. Core Strategy Policy CS12 sets out a duty to conserve or enhance the significance of the City’s heritage assets and their settings, by (among other things) ‘safeguarding the City’s listed buildings and their settings, while allowing appropriate adaptation and new uses’ and ‘preserving and enhancing the distinctive character and appearance of the City’s conservation areas, while allowing sympathetic development within them’.

The City of London Corporation has produced a Character Summary and Management Strategy SPD for Smithfield Conservation Area, which sets out the history, development and character of the area, and describes how the Smithfield Western Market Buildings contribute the architectural unity of all of the market buildings.

**English Heritage Position**

The starting point for assessment and advice on the development of the Smithfield Western Market Buildings has always focussed around the conservation of the significant architectural elements of the site and the retention of as much of the existing silhouette as possible. However, the repair costs associated with the large size and very poor condition of the buildings, added to the need to repair the tunnel structures beneath part of the site, mean that long term viability is unlikely to be achieved without additional subsidy. We are persuaded that an amount of new development on the site is required.

English Heritage’s position is that any new development should be the minimum to ensure long term viability, and should be of a scale and design that would maintain, and, where possible, enhance the significance of the retained and conserved elements of the buildings and the character of this part of the conservation area.

Although the new development at the centre of the General Market Building will result in the loss of elements of moderate interest (the 1960s concrete dome, the timber roof and parts of the interior of the market hall), this needs to be balanced against the benefits through the proposed repair and restoration of most of the richly decorated red brick perimeter buildings, which are the most significant elements on the site and those which contribute most to this part of Smithfield Conservation Area. The comprehensive restoration work will include the reinstatement of missing historic features like ground floor shop fronts and traditional butchers’ awnings. This work will animate the buildings, re-integrate them into the surrounding public realm and enhance their contribution to the significance of this part of the conservation area. In the interior of the proposed new building at the centre of the General Market, the cast iron ‘Phoenix’ columns from the original market hall will be re-used to support the soffit of the restored perimeter buildings, and some of the other significant interior features will also be re-used.
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The proposed new development brings with it a variety of beneficial and harmful impacts to the historic built environment, and the harmful impacts need to be weighed against the benefits that the scheme will deliver. In our view, the repair, restoration and re-use of the most significant elements of the Victorian market buildings is positive, and will go some way toward enhancing the significance of the conservation area (NPPF Paragraph 137). The new elements of the building are robust and clearly contemporary in style, but are visually neutral enough to defer to the restored historic elements of the complex in some, but not all, important local views.

The NPPF sets out a presumption in favour of sustainable development, which includes conserving heritage assets in a manner appropriate to their significance (NPPF Paragraph 17). The current proposals safeguard those historic elements of the site that contribute most significantly to the character and appearance of this part of Smithfield Conservation Area, and focus new development on less significant parts of the site. Whilst the scale of the development will cause moderate (less than substantial) harm to the conservation area in certain views, on balance the proposals will offer public benefits that potentially outweigh this harm, including securing an optimum viable use for the General Market Building, Annexe Market and former Red House Cold Store (NPPF Paragraph 134).

Recommendation
The current proposals represent a realistic long term proposal to bring the redundant Victorian buildings back into a viable use, and follow the developer’s already considerable investment into the railway tunnel lids. In our view, it is unlikely that a scheme with less or no new development on the site will come forward in the foreseeable future, as this would not be financially viable. The City of London Corporation has no intention to commit funds to repair the buildings in their freehold ownership. In this context, the current proposals may represent the optimum opportunity to regenerate this long vacant site and restore its most significant historic elements. In that regard, and in accordance with the advice set out in this letter, we recommend that, in coming to a decision whether to grant planning permission and conservation area consent, the City of London Corporation Planning Department very carefully consider the extent of harm to the historic environment, and whether it is necessary to deliver the potential public benefits.

If the City of London Corporation takes the view that the public benefits of the proposals outweigh the harm to the historic environment, or that the proposals are appropriate in other planning respects, then English Heritage would support their approval.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended
that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

Yours sincerely

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cc: Barnaby Collins, DP9