



Gemma Delves
Planning Officer
City of London,
Guildhall,
PO Box 270,
London,
EC2P 2EJ
25th April 2013

Dear Gemma Delves,

Application nos. 13/00150/FULEIA, 13/00155/LBC and 13/00156/CAC

Partial demolition of the existing buildings and other structures at 43 Farringdon Street and part redevelopment and part refurbishment of the existing buildings to provide office (B1) and retail (A1-A3), part demolition of the existing buildings and other structures at 25 Snow Hill and 29 Smithfield Street to provide offices (B1) and retail (A1-A3) uses with associated servicing and access: (39,441 sq m).

Partial demolition of the existing buildings and other structures at 43 Farringdon Street, 25 Snow Hill and 29 Smithfield Street in association with the part redevelopment and part refurbishment of the existing buildings to provide office (B1) and retail (A1-A3) use with associated servicing and access.

Dismantling of the grade II listed canopy spanning West Poultry Avenue between the General Market and Poultry Market and work of making good.

This letter is to register SAVE Britain's Heritage's multiple objections to the above application.

The Site and its Architect

The General Market and Annex self-evidently complete one of the grandest surviving groups of market buildings in Western Europe (especially after the destruction of Balhard's Les Halles in Paris).

As well as being great Victorian landmarks, Smithfield General Market and Annex constitute London's last threatened market halls. The buildings in question form part of an enclave of historic buildings unlike any other in the City, retaining a

powerful historic and architectural sense of place. Smithfield General Market is a public asset, owned by the City of London Corporation. It has been largely kept out of use since the 1980s when the market closed. These buildings are capable of reuse with minimal intervention, and are potentially a huge asset to this part of the City, yet they lie purposely disused and without maintenance.

Smithfield General Market and Annex were designed and built by Sir Horace Jones (1819-1887) the ebullient surveyor and architect to the City Corporation whose other much-loved London landmarks include Leadenhall Market, Old Billingsgate Fish Market and Tower Bridge. Smithfield Meat Market was built in the 1860s, the Poultry Market in the 1870s (destroyed by fire in the 1950s and rebuilt), and the General Market, Annex and Red House in the late 1870s-1890s. The Red House, while not by Jones, imitates his vocabulary. The market buildings form the core of the Smithfield Conservation Area, which, save for the redevelopment of the Poultry Market following a fire, has survived together with its historic surroundings, substantially unchanged since Sir Horace Jones designed the market buildings and re-planned the whole neighbourhood in the 19th century. The central dome of the market hall, damaged by a 1945 bomb, was rebuilt in a sensitive manner matching and retaining the surviving ingeniously glazed roofs around it.

The internal market halls with their widely spaced and powerful Phoenix columns are still remarkably complete. Viewed from above, whether from the public view at Holborn Viaduct or from new high-rise buildings around, the General Market roofs are as exotic as a souk or bazaar - a 'fifth façade' – one unified piece with the other market buildings.

Of the roofs of the General Market, historian Dr Jenny Freeman, expert on Sir Horace Jones, writes:

“In his roof structures and interiors Jones was an innovator, covering timber with iron plate, laminating timber-roof trusses for coolness in the General Market, advocating laminating timber with iron as a fire retardant. He used Phoenix columns here on which the shallow replacement dome of the early 1950s were successfully constructed, following war damage.

Jones made his own precedents. He addressed the issue of ventilation, excluding solar gain with low timber roofs and skillfully angled louvers to keep out the sun, rain and snow, thus retaining cool, even temperatures.”

Sir Horace Jones's oeuvre is distinctive and brilliant, but not large. A significant number of major buildings by him have been destroyed.

Background

This is the second application to demolish since 2007. The first application was

overturned in a full Public Inquiry, at which SAVE Britain's Heritage was a key witness. SAVE Britain's Heritage continues to support the conclusions of the Inspector's Report, a document that was accepted by the Secretary of the State in early 2008. The Inspector concluded that the site offers an opportunity for regeneration of the kind undertaken at Covent Garden, Spitalfields, Greenwich or Camden Lock. The Inspector also concluded that the City should market test conservation-led schemes for the site.

The present application fails to take the conclusions of this major Public Inquiry into account, and fails on several key points of National Planning Policy and against local policy, specifically the Smithfield Conservation Draft Character Summary and Management Strategy, and the City of London Local Development Framework.

In our view this Application proposes the worst mutilation of a Victorian landmark in the last 30 years. The following are our Grounds for Objection:

1) The proposal entails the loss of a major landmark building – the General Market - including its magnificent interior with its great market halls and roofs.

2) The proposal will cause **substantial harm** to the Smithfield conservation area and surrounding conservation areas, Grade II* listed Meat Market and Grade II listed Poultry Market including the loss of its listed canopy. There will be the loss of important views, including from the Holborn Viaduct.

3) The site has never been put on the open market by the City, as recommended by the Inspector following the Public Inquiry of 2007/2008 that overturned a previous application to demolish. He concluded that this was the only way to test the economic viability of a conservation led scheme for the site. This is despite the existence of such a scheme.

4) There is no convincing justification for loss and demolition. "Heritage assets are irreplaceable, any harm or loss should require convincing justification." (National Planning Policy Framework paragraph 132).

5) The condition of the buildings, which have been deliberately neglected, is not a justification for demolition. There is evidence of **deliberate neglect** of the building going back over 30 years. "Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision." (National Planning Policy Framework paragraph 130).

6) The application breaks up a significant group of buildings and causes **substantial harm** to the setting of the Grade 2 Listed Poultry Market, built in response to the

Meat Market and General Market. By losing one of its points of reference, it will lose its context and its anchor in the market complex. In this case, the loss of most of the built fabric of one building (the General Market) will lead to the loss of Smithfield Market as a group of buildings. The Applicant goes so far as to claim that the 1950s Poultry Market, as well as the post-war repair at Harts Corner, weakens the architectural unity of site. This is puzzling as the Poultry Market is listed, and the Public Inspector and English Heritage both underlined their significance in the Public Inquiry.

7) The application is misleading. The word 'demolition' is nowhere used. Instead the words 'soft-stripping' and 'dismantling' are used. Many of the photographs of key views are significantly out of date. In addition, the CGIs of the new scheme as shown at the public exhibitions painted a picture of the proposal that is not supported by the drawings. It is described as a 'conservation-led scheme', something that is also not supported by the drawings. In addition, the Applicant states that Hart's Corner is being removed in order 'to reveal views to the market interior.' This is highly misleading seeing as they are demolishing the interior, and replacing it with a much smaller market space, which does not retain the original design, layout or fabric. All these factors constitute a false, rather than full picture of the scheme and its impacts.

8) The Applicant claims to be working in the spirit of the building's architect, Sir Horace Jones in that they are: "following the rising topography in a similar way to that employed by Jones". The General Market is on a sloping site – any building there would have to respond to its topography. There is no evident connection with Horace Jones in the proposed scheme and any attempt to establish one is cynical and misleading.

9) The conclusions of the 2007/2008 Public Inquiry are poorly represented in the Application. The Inspector's Report that concluded the Inquiry is of important material consideration. Despite this, there is no reference to the Inspector's comments on the significance of the buildings or site in the Introduction and Conclusions of the Applicant's Environmental Statement. This includes the Red House that was listed for a time after the Public Inquiry, and the roofscape and townscape. In contradiction to the Inspector, the Applicant claims that the roofscape has no significance. The Applicant claims that most of the original roof is missing; in fact it is only the dome and the area near Hart's Corner that were replaced following the 1945 bomb.

10) The Smithfield quarter, like Covent Garden before it, has come to life thanks to natural regeneration as small businesses have colonised the streets around the market buildings. This is creating one of central London's liveliest districts, full of both traditional character and new life. Crossrail will open in five years, bringing large volumes of people to the area. The pavements are already overflowing. The site could become one of London's chief public spaces serving the city and its visitors. The economic sense of more offices is doubtful: many offices on Farringdon

Road directly adjacent to the site lie empty. Heritage must be at the centre of any new development if it is to serve London and thrive in the long term.

In conclusion, we urge the City of London Corporation to refuse this Application. Moreover, we urge the City of London to follow the conclusions of the 2008 Public Inquiry that overturned a previous application to demolish these buildings. The Inspector stated that the site should be placed on the open market to test the commercial viability of a conservation-led scheme. Unless this is done, any scheme that comes forward will be justifiably open to challenge.

SAVE has been involved in securing a new future for some of the great sites of London including Battersea Power Station, Bankside Power Station (Tate Modern) and Billingsgate Fish Market.

We submit, together with this letter, 3 Appendices that support our objections as laid out above:

1) The SAVE 2004 report on the site 'Don't Butcher Smithfield' for its extensive information on the historic significance of the buildings and their architects and of the Smithfield Conservation Area.

2) The SAVE 2012 report 'Smithfield Market: The New Vision' - a conservation led scheme for the site, with drawings by architect John Burrell.

3) An Independent Appraisal of the Hendersons Application by Alec Forshaw, completed in April 2013.

Yours Sincerely,



Clem Cecil, Director

SAVE Britain's Heritage