

APPENDIX THREE: CONSULTATION SUMMARY

1 INTRODUCTION

- 1.1 This document provides a summary of the public consultation of the updated Character Appraisals and Management Plans and proposed boundary changes for five conservation areas in and around Whitechapel. It sets out how the consultation was carried out, who responded, what main issues were raised and how the documents were amended as a result of these.

2 PUBLIC CONSULTATION

- 2.1 A public consultation was held on the updated CAMPs between 11 February and 24 March 2019. Details of the consultation were published on the council's website and site notices were displayed throughout each of the five conservation areas. Letters were sent to each of the addresses that would be affected by the proposed boundary changes and emails were sent to major stakeholders with an interest in the areas.
- 2.2 Two drop-in sessions were held at the Whitechapel Idea Store during the consultation period: one in the afternoon and one in the evening. At these sessions, copies of the consultation documents were made available and exhibition boards displayed information about the key issues in the conservation areas. Council officers were available to present the information and answer questions.

3 RESPONSE TO PUBLIC CONSULTATION

- 3.1 Responses were received from the following consultees:

- Alliance Property Asia [DP9]
- Bengali Heritage Society
- Cross Property Investment Sarl [DP9]
- Department of Health [Montagu Evans and Donald Insall Associates]
- Local residents X 6
- NHS Property Services [DP9]
- Queen Mary University [CBRE Ltd]
- Royal Mail [Gerald Eve LLP]
- Sainsburys PLC
- Transport for London Commercial Development
- Transport for London Heritage
- Transport for London Spatial Planning

4 MAIN ISSUES RAISED

- 4.1 A considerable number of comments were received as a result of the wide and inclusive consultation which was carried out, and the draft documents have been amended to reflect these comments. The following is a summary of the main matters that were brought up and how they have been addressed.

Document status

- 4.2 The draft CAMPs stated that the documents would be Supplementary Planning Documents [SPDs]. Representations were received that challenged the proposed status of the documents as SPDs, commenting that the intention to prepare SPDs was publicised in the council's Local Development Scheme [LDS], which is a project plan that sets out the timetable for new or revised development plan documents. The intention to prepare updated conservation area appraisals and management plans for five conservation areas in Whitechapel was, in fact, set out in the LDS appended to the 2017 Annual Monitoring Report.
- 4.3 Notwithstanding the above, it has been decided that at this time the CAMPs should be adopted as planning guidance rather than SPDs. Whilst planning guidance does not have the same weight in the planning decision making process as and SPD, it is nonetheless a material consideration and should be taken account of when determining planning application.

Relationship to planning policy

- 4.4 Representations were received stating that the draft CAMPs are not consistent with adopted planning policy. In particular, it was commented that the documents do not pay sufficient regard to the potential for future change in the area and the contribution that the sites in the area to meeting objectively assessed need. For example, as articulated by the Whitechapel South site allocation in the Tower Hamlets Local Plan.
- 4.5 The CAMP documents state from the outset that they are to be read in conjunction with planning policy. It is not the purpose of the documents to repeat all relevant planning policy, although considering the comments received the documents have been amended to provide a more comprehensive list of planning policy documents that it supports. In addition, the wording of the documents has been reviewed and in some instances, it has been amended to provide a better interpretation of planning policy. For example, comments about the demolition of buildings have been noted and the CAMPs wording has been amended accordingly.

- 4.6 Representations received have highlighted the fact that the wording in the CAMPs in relation to the demolition of buildings might be considered too strong and may be construed as being contrary to the National Planning Policy Framework and established planning case law. These comments have been noted and the document wording has been amended accordingly.

Buildings making a positive contribution

- 4.7 The CAMP documents contain an assessment of which buildings are considered to make a positive contribution to the character of the conservation area. The draft documents stated that either all or the majority of buildings made a positive contribution. Representations were received that objected to the identification of some buildings as contributing positively to the conservation areas. The qualitative assessment of the buildings has been reconsidered in light of these comments received and in some instances the documents have been amended accordingly.

Tall buildings

- 4.8 The documents note that in some instances tall buildings have caused harm to the setting of some of the conservation areas. Representations were received stating that further large development should not automatically be considered unacceptable. This point is noted and it is recognised the wording of the documents has been amended to state that further large development has the potential to cause harm. It has also been noted that development outside of the conservation area boundary may assist in mitigating that harm.

Boundary changes

- 4.9 Representations were received in support of the removal of the Bio Science Innovation Centre and the Blizzard Building from the Myrdle Street Conservation Area.
- 4.10 Representations were received objecting to the removal of new Royal London Hospital building from the London Hospital Conservation Area. It has been suggested that despite its perceived unsympathetic aesthetic features, the new building provides communal value and its proximity to the former London Hospital represents a continuity of providing healthcare in this part of London. However, after careful consideration it has been concluded that the building is not typical of the character of the conservation area and does not contribute positively to its character and appearance.

- 4.11 Representations have also been received objecting to addition of former Outpatients Department Annex to the London Hospital Conservation Area. The representations point out that the annex was not included in the conservation area when it was originally designated in 1990, and therefore must have been assessed as not having the potential to make a positive contribution to the conservation area. The representations also state that the annex is not a particularly notable example of hospital architecture and has undergone significant alteration. Overall, it is said, the proposal to include the annex in the conservation area is not substantiated. Officers have given careful consideration to these comments and have also noted that the annex was not added to the conservation area when the last appraisal was carried out in 2007 and that the building has more in common with some of the larger properties on New Road that are not in the London Hospital Conservation Area. In view of this, whilst it was initially considered that the annex had a strong historical association with the hospital and would make a positive contribution to the conservation area on reassessment it is thought that, on balance, the annex should not be added to the conservation area and its status should remain unchanged.
- 4.12 Representations were received objecting to the inclusion of the Cannon Barnett Primary School in the Whitechapel High Street Conservation Area. These reasons include the assertion that insufficient justification for its inclusion has been provided. However, it is considered that the building is an impressive example of an early twentieth century school, which would make a positive contribution to the conservation area. In particular, it is considered that the twin turrets are an attractive feature in local views.

Emphasis on Victorian and pre-Victorian London

- 4.13 Representations were received stating that the Whitechapel Market and Whitechapel High Street CAMPs place too much emphasis on the Victorian and pre-Victorian London and do not reflect the role played by Tower Hamlets' diverse communities, especially how the Bangladeshi/Bengali and other minority ethnic groups have contributed to this unique area of London.
- 4.14 Conservation areas are areas of special architectural or historic interest the character or of which it is desirable to preserve or enhance. In Whitechapel the special architectural character and appearance is defined by the area's built heritage which is largely Victorian, and this means that the emphasis of the appraisal is on that built heritage. The built heritage of the area is however a reflection of the people that have lived in and worked in it over centuries and the text has been reviewed and amended to fully acknowledge the contribution that the Bangladeshi / Bengali community have made to the evolution of the area, particularly since the early 70s. References to the role of this community

in the intangible heritage of the market and to its heritage in other ways, eg Altab Ali Park, and the Shaheed Minar Monument (which is a smaller replica of the Shaheed Minar in Dhaka designed by Hamidur Rahman in 1963) have been included. Going forward the contribution of this communities will play a major role in providing the heritage of the future