



## **A SUMMARY OF OUR CASE FOR THE REPAIR AND RETENTION OF SMITHFIELD GENERAL MARKET**

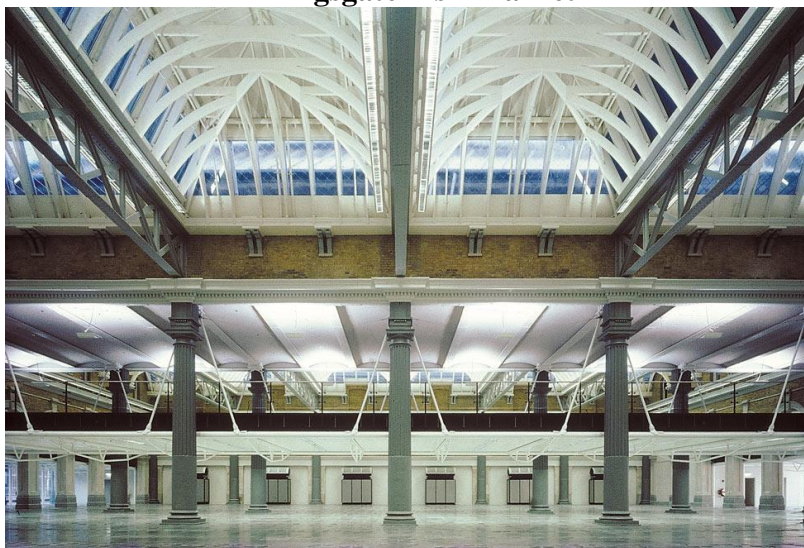
### **SAVE BRITAIN'S HERITAGE**

SAVE has been campaigning for London's landmarks for nearly 40 years. SAVE led the fight for Billingsgate Fish Market, designed by Sir Horace Jones, which the City Corporation was determined to demolish and replace with an office block.

SAVE has always taken a long view. It led the fight for both Battersea and Bankside power stations, obtaining the first planning permission for Battersea to be transformed to leisure use, which was followed by its listing. It has been a long struggle but now £800 million is being invested in the repair and conversion of Giles Gilbert Scott's masterpiece. When SAVE first met the power station's top brass we went to Bankside where we suggested a proposal for it to be converted to an art gallery. The power station's owners wanted to demolish Bankside and build offices. It wasn't listed. Now it is restored and revived and the most visited modern art gallery in the world, though SAVE were told time and again that it was a big white elephant.

SAVE has been working in the Smithfield area for over 15 years and has watched the streets around the market being revived through market forces. The building SAVE occupies, a former Thomas Cook warehouse, was once derelict too.

**Billingsgate Fish Market**



## **THE SITE AND ITS SIGNIFICANCE**

The Western Markets comprise the main part of the original Smithfield Conservation Area, designated by the GLC (over the head of the City Corporation) in 1986 because of threat from office redevelopment. The amalgamation of this with other conservation areas, such as St Bartholomew's, to form the current large Smithfield Conservation Area, came later.

The City's Core Strategy notes that the market complex remains the dominant influence on the whole Smithfield area.

The City's character appraisal divides the larger Smithfield Conservation Area into sub-areas. It is considered that the preservation and/or enhancement of the character of this part (Sub-Area 3) of the Smithfield Conservation Area is as important as its appearance. The gritty character of the existing wholesale markets and the unused General and Annex Markets is very different to other Sub-areas of the Conservation Area, such as Hosier Lane. It is in even starker contrast to the recent large-scale office developments outside the Conservation Area on Holborn and Farringdon Road/Street and those granted permission at Caxton and Cardinal Houses and Lindsey Street. The extraordinary character of the Smithfield market complex, with a history stretching back to medieval times, is unique.

We are talking not just of handsome street frontages, but a whole series of Victorian market halls, superbly designed and constructed using the latest technology. Following the lead of the Crystal Palace, an acknowledged masterpiece of nineteenth century world architecture, Britain led the way with iron and glass structures, whether railways stations, market halls, covered arcades or great conservatories such as those at Kew Gardens.

**Smithfield General Market, with the Poultry and Meat Markets behind**



The Smithfield Market buildings were from the start interconnected and built along a single grand walkway which continued from building to building, sheltered by a series of canopies. Though this was principally a wholesale market it has always attracted visitors interested in the development of cities as well as seeing the life of a busy market. The architect Sir Horace Jones was a master-planner par excellence as is evident from the group of buildings that make up Smithfield Market.

London has long been regarded as a city of villages and distinct neighbourhoods. Similar market neighbourhoods at Covent Garden, Spitalfields, Borough and Greenwich Markets have all now been revived and become intensely popular destinations. Many of the market users of Spitalfields, Greenwich and Borough constitute either London residents, or the many people who come regularly from the Home Counties and beyond to visit the capital.

### **The Interior of the General Market**



SAVE's case is based on the importance of the market halls as public realm, both present and future. This public realm is expressed in the permeability of the existing market buildings. It is an unfortunate fact that the General Market and Fish Market have been boarded up and closed for so long, but this was a decision of the City. Conservation areas are not simply about preserving street frontages and the exteriors of buildings. There is a wide range of buildings which offer covered open space, be they railway stations, shopping arcades, or market halls.

The market halls of the General Market have a special quality and character as open spaces. They are also important examples of fine engineering structures. They are virtually complete apart from the reconstruction of the dome, which rests on the original columns and supporting lattice girders. A remarkable amount of Victorian ironwork survives, not just the distinctive Phoenix columns and lattice trusses, but the subsidiary cast iron columns and ornamental brackets used by the traders for the display of wares.

## **BACKGROUND OF THE PRESENT PLANNING APPLICATION**

An inquiry in 2007-8 was held into a previous application to entirely demolish the General Market and Annex and replace it with a single office block. The Inspector recommended that the buildings should be retained and that the site should be put on the open market to allow conservation led schemes to come forward. The Secretary of State upheld the Inspector's decision, however neither of the recommendations have been followed. The present public inquiry revealed why, and also revealed the extent to which the City has not changed its damaging course regarding this site.

The previous application was made by the then owners Thornfield PLC. This company subsequently went into liquidation and was taken over by Henderson Global Investors who therefore automatically became owners of the site. Hendersons does not specialise in historic buildings, but new build, for example the 9-storey Caxton House that is being erected on a neighbouring site.

The previous Inspector concluded (paragraph 12.3.7) that 'A re-use scheme might be better able to withstand the vagaries of the commercial property market, as initial expenditure would be less, phasing the works might allow cashflow to start from an earlier stage, and occupiers might want to participate in financing the scheme. Such a scheme might also be more flexible than trying to pre-let 60% to major tenants... In my view, Smithfield would be a more attractive location for a market than Greenwich, due to its accessibility and proximity to attractions such as St Paul's'.

### **Deliberate Neglect**

A key issue at the present inquiry was whether there had been deliberate neglect of the buildings or not. National Planning Policy indicates that deliberate neglect is not a justification for demolition. The Inspector at the previous inquiry found that there had been neglect of the historic market buildings. English Heritage reiterated in their evidence in the previous decision that there had been neglect. SAVE holds that is perfectly obvious that looking at the site that there has been neglect. It is clear that the City has not repaired and maintained the buildings in a manner of trying to retain them for the future. This became apparent when the inspector toured the market buildings on the penultimate day of the inquiry. Glass from the roof of the canopy linking the General market with the Fish Market was lying broken on the ground forming a clear hazard to pedestrians. Subsequently all the glass has been hurriedly removed from the canopy roof over the street.

This neglect has obviously increased the cost of refurbishing and reopening the market. However all are agreed that the structure remains fundamentally sound and serviceable. The General Market building is currently in intensive use as an office for railway associated work. These offices are in portacabins installed in the arcades of the market. The people using them are office workers rather than construction workers and it is notable that it is not a hard-hat area. This demonstrates the safety of the covered market despite the neglect. Neither is the annex is a hard-hat area though presently not in use.

It is a lamentable fact that Henderson Global Investors have consciously decided to leave the Annex empty since they came into ownership. The Local Planning Authority, the City Corporation, has not been pro-active in exercising its duty to preserve and enhance the character and appearance of the conservation area, such as using their powers to arrest the decay of the buildings or seek beneficial use. The City Surveyor did not submit evidence at the present inquiry, nor was he present to answer questions at this inquiry.

### **Market Testing**

Between 1992 and March 2012 it was always understood that the only real way to test the viability of a retention scheme for the site was to put the long-lease on the open market. We know consistently, for whatever reasons, that the City Corporation not only hasn't done so, but have closed the door to every expression of interest from anyone else other than Thornfield and Henderson, on the grounds that they're powerless to deal with any other party.

Hendersons have publicly stated that they would leave the site to decay if the scheme is refused. As a company responsible to its investors, Hendersons would hardly be able to justify letting the buildings stand idle if there was rental income to be generated. The inspector has to take a view as to whether that is a serious proposition, and whether the Secretary of State would allow any developer to take that view, given the effect on a designated heritage asset.

### **The Position of English Heritage**

The appendices in Hendersons' planning witness Alan Simmonds' evidence include some correspondence between English Heritage and Thornfield and then Hendersons over the last few years. It came to light that within months of the decision on the previous inquiry, English Heritage decided that there was in fact no need for market testing. SAVE considers that this ill-judged mistake led to the highly damaging scheme that has been the subject of the call in and inquiry.

English Heritage in its evidence to the inquiry was at pains to emphasise that its letter to the City Corporation commenting on the present planning application was not a letter of approval. The letter states that 'if the City of London corporation takes the view that the public benefits of the proposals outweigh the harm to the historic benefits, or that the proposals are appropriate in other planning respects, then English Heritage would support their approval'. In turn the City of London has based its approval on what it perceived it to be support from English Heritage. This proposal was therefore approved for planning permission without a clear statement and justification of support from either party.

In addition, SAVE continues to maintain that the General Market and Fish Market Annexe are of sufficient quality to be worthy of listing. Given English Heritage's effective support for the Henderson application it would be impossible for them at the same time to recommend the listing. It needs an independent party to look at their decision making again. SAVE submitted a petition of over 2,500 signatures to Ed Vaizey MP last year calling for the site to be listed. The number of signatures since then has risen to almost 5,000.

## **AN APPRAISAL OF THE PROPOSED DESIGN**

SAVE contends that the new office buildings proposed by architect John McAslan to be inserted into both the General Market building and the Annex do substantial damage to the Conservation Area, as well as to adjoining listed buildings and street views.

In 2008 John McAslan carried out an extensive exercise setting out what he felt to be the necessary parameters for considering how to bring these historic buildings back into use. He has since moved away from adopting any of them.

Though Mr McAslan's proposed offices in the General Market building stepped back in a series of three, in an attempt to reduce their impact, SAVE contends that at the eastern end in particular they will be bulky and ungainly and will appear totally out of scale in relation to the remaining perimeter walls and other adjoining buildings including the listed Poultry Market. The greatest damage will be evident when Mr McAslan's buildings are seen projecting over West Poultry Avenue as viewed from the south. Here his new buildings will be extremely assertive and are seen at their highest elevation, which in terms of bulk will be above the graceful line of the Poultry Market building.

We further submit that the juxtaposition between the cantilever of the new build and the truncated canopy of the Poultry Market is of an order of clumsiness that cannot be accepted as good design. SAVE noted that this view was not among the required views and had not been seen by anyone until Mr Burrell produced his own sketch diagram showing its bulk at the inquiry.

The two cantilevers over West Poultry come so close that they almost abut. The views out of the new offices on West Poultry will be unsatisfactory as they will look straight onto a truncated canopy which will be just 20 feet from the windows.

SAVE objects equally strongly to the proposed new seven-storey building set behind the Red House facade. Mr McAslan described it as having the character of anthracite. Given its size and bulk we believe that a large black building will contrast in an extremely painful fashion with the graceful and well-proportioned frontages of the Red House and Annex. The new anthracite building will be twice the height of the Red House and will tower above its graceful arcaded facade and will equally be extremely intrusive in the relatively low-rise views along Smithfield Street and Snowhill.



**The Henderson proposals for West Poultry Avenue**



**The Henderson proposal for the Annex and Red House**



**Sketch by John Burrell showing the how the Henderson proposal relates to the listed Poultry Market**



When filled in the new anthracite coloured office block will block out the sky shown in the picture and indeed rise above the borders of the photograph. Mr Burrell has also produced a new image showing the important vista from the south side from West Poultry Avenue. Here Hendersons' office blocks rise in an extremely clumsy fashion behind the preserved facades along the south of the market.

Further damage will be caused by the McAslan scheme to views of the Poultry Market. The Poultry Market, though a building of substantial size, blends into the general run of market buildings thanks to the gentle lines of its handkerchief dome. The stepped blocks of Mr McAslan's new offices will block or obscure the dome in key views, thereby damaging the views and setting of an important post war listed building.

The design of the modern insertions will severely damage the conservation area, both street views and elevated views, both in the immediate vicinity of the buildings and in longer views. We are surprised at the way the two most damaging aspects of the proposals have been 'airbrushed out' in CGIs accompanying the planning application.

First there is the view from Snow Hill, where the bulk of the new buildings are represented only by a wire-line in the comparative views.



**The Henderson CGI which uses a wire line to conceal the bulk of the proposals**



The CGIs also mask the size of the new office buildings in the view looking down West Poultry to the north. Once again the top of the building disappears out of the top of the picture concealing its true height, even though it would be perfectly possible to crop the large area of road in the bottom of the picture.

The General Market is at the gateway to the Smithfield Conservation Area, formed by the low roofs of the market buildings. The office blocks of the McAslan design as seen from the corner of Farringdon and Charterhouse Streets will be built over this gateway, blocking it and interrupting the sweep of market buildings leading up Charterhouse Street and causing substantial harm to the conservation area.

SAVE rejects the Henderson claim that Hart's Corner can be considered for demolition on the basis that it is a late 1950s addition. Historic buildings whether listed or not accrue additions that in time become part of their history. The proposal leaving a gap is extremely weak and understated.

## Harts Corner in the 1960s



### **THE ISSUE OF SUBSTANTIAL HARM**

SAVE submits that the Henderson Global Investors proposals cause very substantial harm to both the General Market building and the Fish Market Annex. The proposals also cause substantial harm to the designated Smithfield Conservation Area, both this part of it, and as a whole.

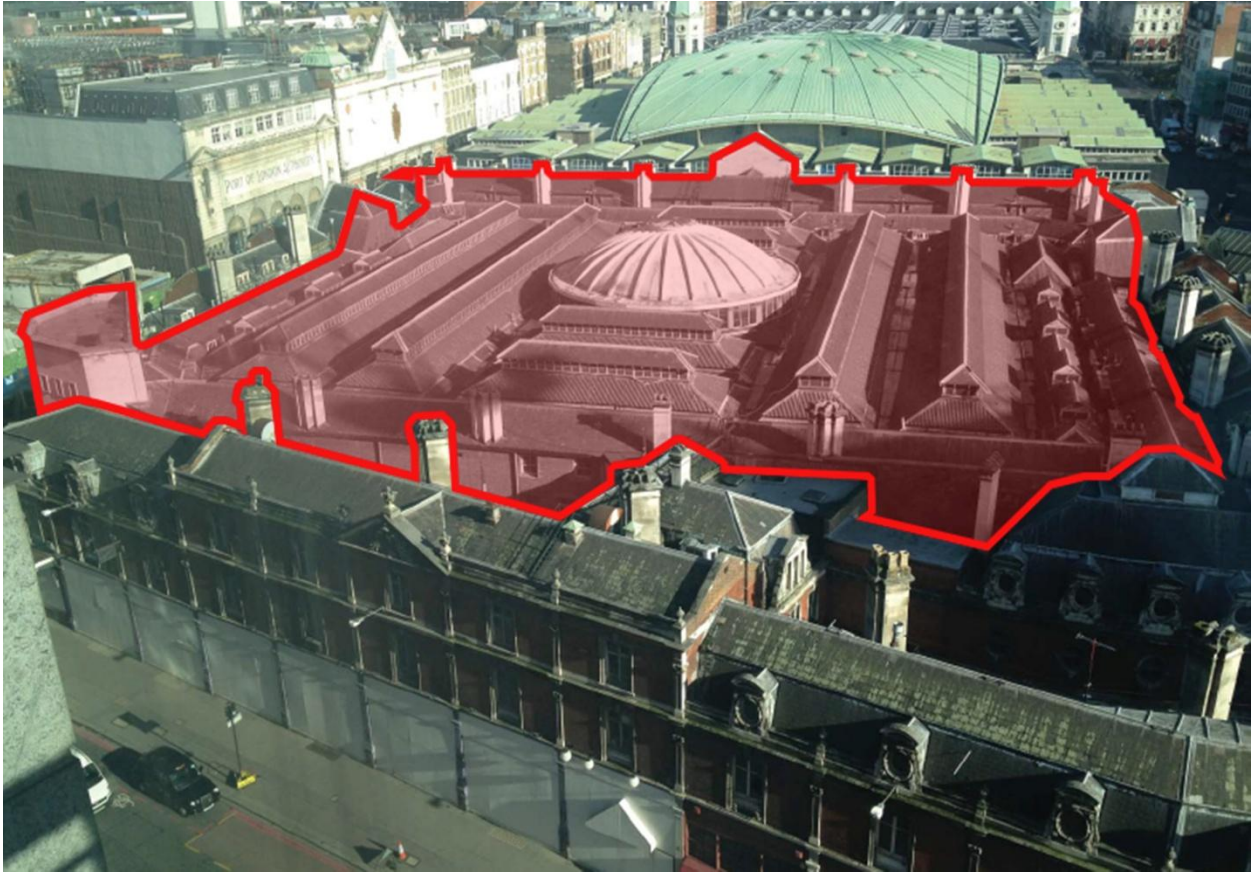
Henderson Global Investors claimed that in percentage terms their proposals retain 75 per cent of the fabric. Evidence submitted for SAVE by John Burrell calculates the retention of the General Market at just 7.5 per cent. This is a difference of a factor of ten. It was not challenged in cross-examination. In SAVE's submission the demolition is so extensive, and so alters the character of the buildings, that the harm must be deemed substantial. While there may remain disputes about the exact percentages of loss and retention, the extent of demolition was clearly set out by Mr McAslan's presentation and the plans before the City Corporation.

It will be a tragedy and completely unnecessary for this site and the conservation area to be overwhelmed with the proposed large new office blocks. As English Heritage has said, the essence of this area is of low-rise buildings.

The Henderson demolitions include virtually the entire length of the General Market building along West Poultry Avenue.



**The extent of demolition is shown in red**



**The extent of demolition is shown in red**

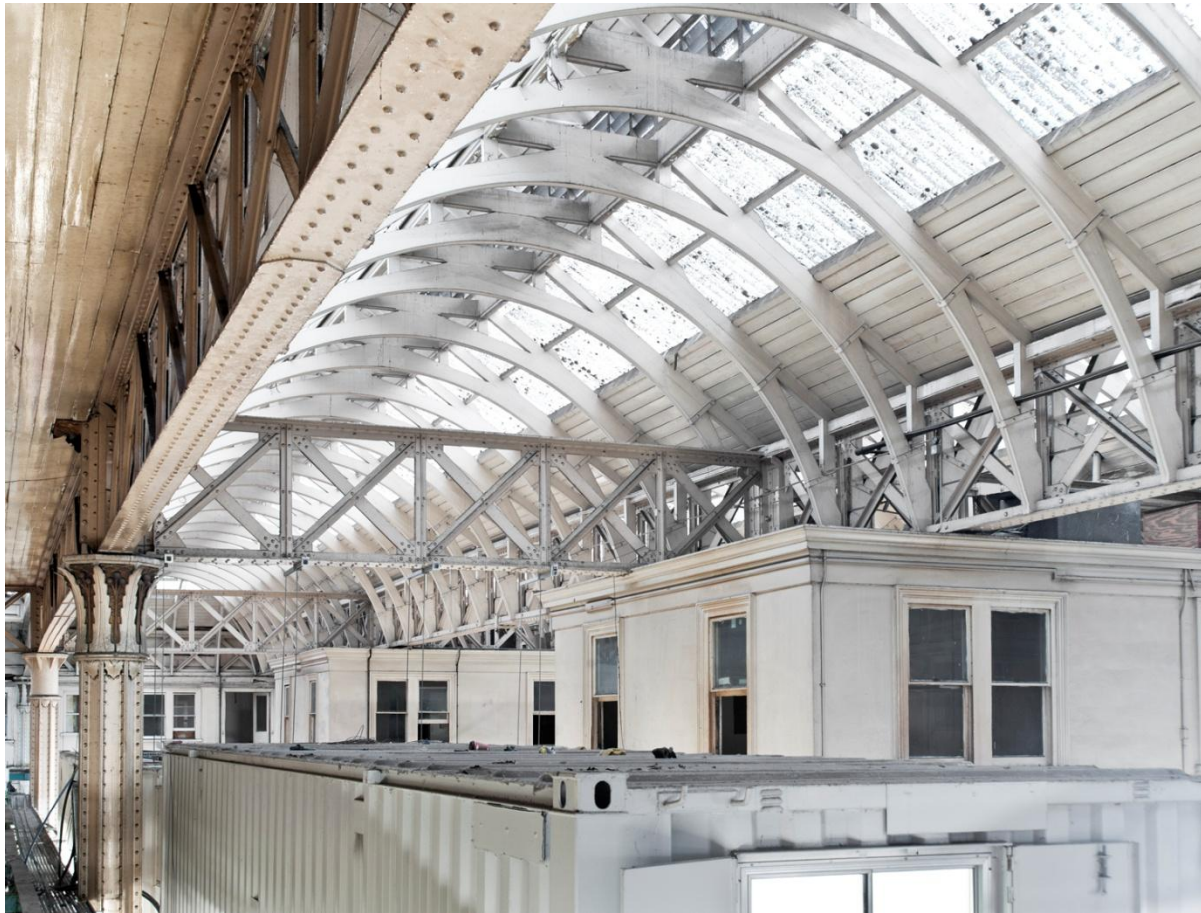




The opportunity has not even been taken to retain the complete run of frontages around the four sides of the island block.

A second point of obvious damage is the removal of the entire internal structure of the General Market building. This is a free standing structure erected on a grid of widely spaced Phoenix Columns, forming one of the most extensive and impressive market interiors in London. This extends not only to the removal of the Phoenix Columns but also the lattice trusses which carry the weight of the dome and other roofs, and also the ingenious flying arches of Horace Jones' arcades which run in both directions forming a neat and consistent piece of geometric design.

### **The Interior of Smithfield General Market**



The damage extends to the removal of the entire neatly geometric roofscape around the central dome which can be seen from Holborn Viaduct and many other vantage points. We assert that this external roof is a fifth facade.

For the many office workers in the area and residents too the views of the market halls roofs are a significant bonus for anyone working in the area. Since the establishment of Google Earth which is massively used, aerial views of cities have become a major part of the way people explore and come to know cities all over the world, including London. The pattern of market hall roofs at Smithfield has become a familiar sight due to their formality and consistency and precise

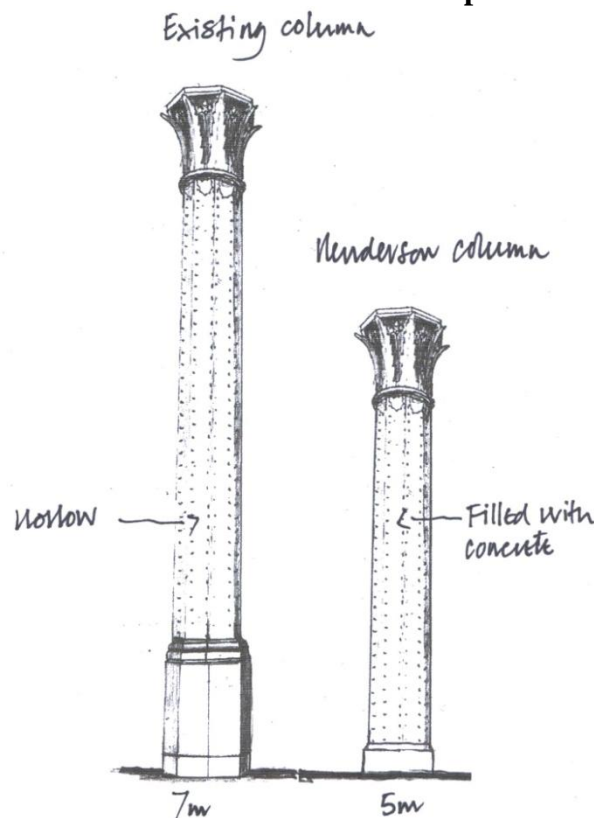


geometry which is in most cases original to the buildings. The loss of the General Market roofs is therefore an important point both externally and internally.

In addition John Burrell has shown, basing his evidence on Mr McAslan's plans, that most of the internal facades facing on to the covered market will also be removed. The result is what Dr Freeman has described as 'old fashioned semi-façadery.' In addition the Portland stone chimneys, which are an essential part of the building's silhouette, are not all retained. The substantial row along the roofs over the inner face of the western side are removed. Essentially the Henderson Global Investors proposals do not retain the full depth of perimeter buildings but in most cases a depth of one room.

Mr Burrell points out that the Phoenix Columns will be reduced from seven metres to five supporting a predominant internal roof height of 5.1m. This leaves no room for the existing 1.5m high lattice trusses. Those shown in the Computer Generated Images (CGIs) must be new and reduced in scale. They are not retained structures as they appear to be in the CGIs. Mr Burrell points out that the extent of demolition is so great it is as emasculating as complete demolition.

**John Burrell's Illustration of the Phoenix Columns as is, and how they will be reduced in scale under the Henderson Proposals.**



The importance of the Phoenix Columns and structural iron was emphasised by English Heritage in 2003. Since then it transpires that the present original arrangement of the Phoenix Columns (and their number) constitutes the finest surviving example in England and possibly in America

too, where they were mainly used in railway bridges and seaside piers. At Smithfield the Phoenix Columns are developed as a carefully proportioned classical order, unusually with gothic detail celebrating the fruit for sale. They have pedestals, bases, column shafts and ornamental capitals, with an added collar of ivy leaves just below the capital. As engineering columns they rival the best examples in railway architecture.

Dr Freeman also explained the intricate engineering of the General Market roofs. Unusually the arches supporting the roof were not made of iron, which had the tendency to overheat in hot weather, increasing the overall temperature of the market hall in an age before refrigeration. Instead Horace Jones used laminated timber arches which did not absorb and conduct heat like iron and ensured the market halls remained cool in summer.

**John McAslan CGI of the interior of the General Market. Note the truncated Phoenix Columns, artificial light and brand new jack arches.**



There is a wider point of principle here which dates back to the very beginnings of public campaigning for historic buildings. The great William Morris, founder of the SPAB repeatedly asserted that ‘restoration’ or tampering with the fabric of a historic building can be a fate worse than death or destruction. In SPAB’s 1877 manifesto he wrote:

*“...of all the Restorations yet undertaken, the worst have meant the reckless stripping a building of some of its most interesting material features.”*

*“...resist all tampering with either the fabric or ornament of the building as it stands.”*

This point was strongly reasserted in the SPAB’s Magazine in Autumn 2013:

*“The demolition of the interiors of these buildings, which provide so much of their interest and character, would be profoundly regrettable. Reducing the buildings to mere facades would result in substantial harm to their character and significance, as well as showing a complete disregard for their fundamental architectural integrity. Since its inception, the SPAB has campaigned vehemently against this kind of facadism: “As good buildings age the bond with their sites strengthens. A beautiful, interesting, or simply ancient building still belongs where it stands however corrupted that place may have become. Use and adaptation of buildings leave their marks and these, in time, we also see as aspects of the building’s integrity. This is why the Society will not condone the moving or gutting of buildings or their reduction to mere facades.””*

**The main arcade in the Fish Market Annex, which would be destroyed as part of the Henderson scheme**



The Fish Market Annex. The Henderson proposals imply that the arcades of the Annex which form a triangle are retained. In fact only the two shorter arms of the triangle are retained. The



main arcade which runs across the site extends beyond the triangle in both directions. It is considerably longer than the two retained sections and is to be removed.

The arcade as rebuilt by Mr McAslan would lose the full length of its arched roof and the major part of the walls on the eastern side. The footprint of the main arcade may remain the same but it is a new structure with vastly reduced top lighting which is the major feature of the present arcade. It is also a curious amalgam of half arches feebly echoing the original arches and tall free standing columns which have no relation in design to the existing structure.

**John McAslan CGI of the main arcade in the Fish Market Annex. Note the new roof structure to support the new office building above**





## **THE QUESTION OF DEMAND FOR OFFICES**

Peter Rees, former City Planner and witness at this public inquiry made it clear that an important driver for this scheme is an apparent shortage of new-build office accommodation. SAVE holds that this is a result of the market catching up after the recession of 2008, and the loss of a number of office sites and buildings to hotels.

There is no evidence of any shortage of office accommodation in this area from 2017/18 onwards. There are many large office redevelopment sites, such as 40 Shoe Lane, in the area with planning permission, and several are now under-construction. Most of these are speculative and will be available to the market. Where there is a pre-let it is to a local firm who will vacate their existing offices nearby. Two very large office redevelopment schemes within the London Borough of Islington at Caxton House (Charterhouse Place) and Cardinal House lie between the site and Farringdon Station. The survey commissioned by the City Corporation from the surveyors, Farebrother, omits several other permitted office developments on the Islington side.

Within the City as a whole there are many office sites with consent that await development, or where construction has stalled. In terms of the pipeline of site with office consents, not yet under-construction, this is a changing figure. While the Inquiry was sitting, 89,000 m<sup>2</sup> of new offices were granted planning permission at 40 Leadenhall Street, also to Henderson Global, adding considerably to the pipeline.

In London as a whole, while there may be a housing crisis, there is no shortage of office floor space or development potential. Many regeneration areas have ambitious plans for new offices, including King's Cross, Old Street roundabout, Bishopsgate Goodsyard, Southwark, Waterloo, Victoria, Vauxhall, Hammersmith and Canary Wharf.

## **THE SAVE/USM/CATHEDRAL ALTERNATIVE SCHEME: VIABILITY, FUNDABILITY AND DELIVERABILITY**

These three words became a mantra of the inquiry. It is held that the Henderson scheme meets these criteria and that all other alternatives fail to. These calculations were based on a simple test, that of the red book valuation used by Knight Frank. This has been used as a means of dismissing alternative proposals on the grounds that they will not qualify for a bank loan.

In SAVE's submission this is manifest nonsense. The overall health of the London property market shows there are many people buying buildings in large numbers, as well as buildings of large scale, who do not rely on bank finance but have their own resources and investors. In this case Eric Reynolds, of Urban Space Management, who gave evidence at the inquiry, has shown that he can raise, at short notice, considerable funds of an order needed to carry out a substantial part of his proposed phased £27 million investment.

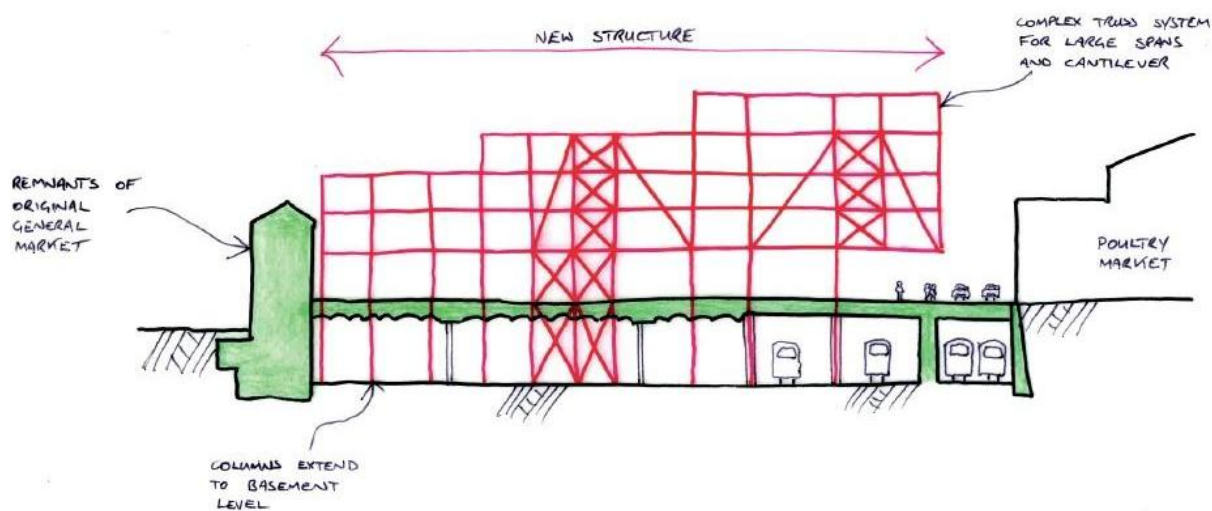
English Heritage said at the last inquiry that the opportunity should be taken to look to non-institutional investors and publicly funded organisations. This is precisely what SAVE has done.

Eric Reynolds, and Richard Upton of Cathedral Group gathered substantial interest among investors in funding this site.

Witness for Hendersons, Andrew Tyler of Knight Frank repeatedly stated that his assessments were based upon 'cold hard facts' but it was subsequently learned that his assessment contained a significant error, miscalculating and overestimating the USM scheme to the tune of £48 million.

SAVE also questions the profitability of Hendersons own proposals. While we do not query whether they have the necessary funds to implement their scheme, we do question how great a priority they will attach to this scheme if it is approved, especially in relation to their recently approved scheme at Fenchurch Street, which offers a massive amount of new accommodation and a vastly increased plot ratio. SAVE submits that the Henderson scheme for Smithfield is far from such a profitable exercise. It involves very complex engineering which was described by Mr Alan Baxter in his submission to the inquiry.

### **Alan Baxter's diagram showing the engineering complexity of the Henderson proposals**



By contrast the USM and Cathedral proposals do not involve any expensive engineering or structural works and simply make use of the existing structure and the massive floor slab which supports it. Eric Reynolds is a specialist in the reuse of historic markets: he has successfully undertaken the re-use of a series historic wholesale market buildings as new visitor destinations throughout the country.

Hendersons' consideration of alternatives to redevelopment within the planning application was insufficient, factually incorrect and highly misleading. The existing buildings are described as being unsuitable for modern requirements. This view is based upon the narrow requirements of the wholesale meat trade and ignores the revival in modern, specialist markets that has accelerated in the last two decades.

The Western Market Buildings, as they currently stand, possess enormous potential for intensive use. They enjoy all of the necessary characteristics to house a modern urban destination market; they could easily be filled with many small, independent retail businesses, combined with perimeter retail within the historic façade and connected to arts, theatre, live music, exhibitions and community events within the Annexe, Red House and Basement of the General Market Building.

The starting point for Eric Reynolds's 2014 scheme is the model of re-use produced for English Heritage as part of the 2007 inquiry. USM's financial model and costs were carefully considered and approved by English Heritage's Development Economics Director at the time.

Following the submission of USM's 2007 model English Heritage stated that:

*“There is clear evidence to show that the General Market can be repaired and viably reused in a way which will add to the creativity and diversity of the Smithfield Area. To the extent that other uses for the car park might not have been fully included in the valuations of retention and re-use schemes, the effect would be to make them more viable.”*

As has been mentioned above, the Inspector concluded that market testing would be the real test of viability for any retention and re-use scheme.

Based upon English Heritage's assessment of repair and refurbishment costs at the 2007 inquiry, the mix of income producing uses proposed by USM generate a positive cashflow and that justifies the scale of capital required to bring the buildings back into use.

The general market and Fish Market Annexe are separate and capable of being used in a phased approach to repair and reuse. There are in fact four self-contained structures; the Farringdon Road frontage, the General Market Building, the Engine House, and the Fish Market Annex/Red House. These structures subdivide into several more areas for example the North, South and East perimeters of the General Market Building. SAVE and Eric Reynolds are therefore confident that a phased approach would be possible in physical terms and very sensible in expenditure and revenue terms. Several elements of the scheme could be up and running, generating revenue and establishing the location as a new destination, whilst refurbishment works take place in other elements of the scheme. A phased approach is possible in physical terms and very sensible in expenditure and revenue terms. The Annex, Engine House and Farringdon Road retail units would not be affected by the present Crossrail use of the General Market. It would be sensible to start works in one or more of these units to ensure that part of the regeneration project was ready to open alongside Crossrail.

The word 'deliverability' was a constant refrain in Henderson's submissions to the Inquiry. Yet there is no mention of 'deliverability' in the Secretary of State's call in letter, or in the NPPF, or in PPG15, or in the previous inspectors report. Instead there is a confusion in terms between viability and deliverability. Viability, unless tested in the open market, is a paper exercise designed to fail unless the client is an institutional developer.

Deliverability is the ability to deliver the finished product, and both these tests are on the balance of probability. Who knows, if planning consent were granted whether Hendersons would ever invest in this scheme where the returns are possibly marginal, in contrast to their cleared site at nearby Caxton House? In SAVE's views there is also an alarming possibility that the wonderful market halls will be destroyed immediately, and the site left to moulder.

The Eric Reynolds and Richard Upton schemes could also be adopted by Hendersons. Both men made it clear that they would happily give Hendersons all the research and expertise they had generated for the purposes of the inquiry in order to ensure that the buildings are brought back into use rather than butchered.

The General Market building and the Annex offer the opportunity for a lively balance between stall holders (who may be different on succeeding days of the week) and shops. The Eric Reynolds' proposals provide a much greater number of smaller shops than the much larger units proposed by Henderson Global Investors. This encourages small businesses and provides the opportunity for successful stallholders to trade up and move from stalls to small shops.

A large artisan market of this kind will be a much greater contribution to the diversification of London than the simple food court proposed by Henderson Global Investors which is essentially for office workers. Mr Alan Baxter produced a plan showing the pattern of markets around London, and this point was addressed by Mr Hephher at the inquiry.

As he showed these markets are one of the liveliest features of the capital and have increased in popularity over recent years. The Smithfield General Market building is at a point some distance from all the other markets, yet nonetheless very centrally placed and with the potential to be major generator for the area.

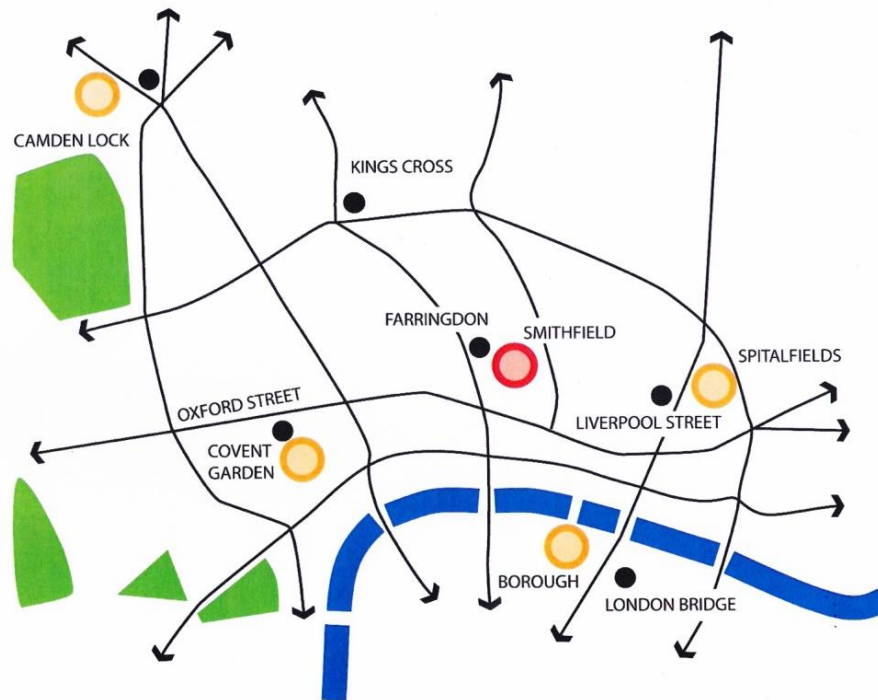
Our planning witness Roger Hephher pointed out that, in addition to the rapidly improving public transport links, there are new pedestrian routes developing. Smithfield is at a key point on a new north-south pedestrian route running between Clerkenwell and Bankside. This route passes through the Smithfield Conservation Area and past St Pauls, and has been greatly reinforced by the Millennium Bridge which attracts a huge number of pedestrians on a daily basis.

The General Market building also lies astride an important east-west axis which runs from Soho, through Covent Garden to Hatton Garden and Smithfield, and connects with the heart of the City as centred on the Guildhall, the Bank of England, Liverpool Street Station and Leadenhall Market.

The report of the previous Inspector emphasised that one of the special characteristics of Smithfield is its openness. This point was developed by Mr Burrell in his evidence. The original smooth fields have remained a large area of relatively low market buildings set in broad boulevards which have almost the character of public squares. The scale of these market buildings relates to the traditional scale or significant groups of buildings and streets, notably the Charterhouse and Charterhouse Square, and the streets around St Bartholomew's.



## Alan Baxter's plan of London markets



The General Market building today presents a sorry appearance as all the perimeter shops but two are boarded up. This is not because they cannot be let. It is because the City and Henderson over a considerable period of years have decided to allow the properties to fall vacant and simply board them up. A tour of Smithfield makes it readily evident that all around the market all the ground floor premises are in use. Businesses come and go, but whenever one enterprise fails or moves on another one rapidly moves in to take up the space. Smithfield is one of the liveliest and busiest quarters in London throughout the day, and clearly this would extend to weekends if the General Market building was brought back in a manner which Mr Reynolds proposes.

## CONCLUSION

SAVE strongly draws attention to the fact that there is a presumption against demolition in a conservation area of those buildings which make a positive contribution to it.

The Henderson scheme is as poor as the previous Thornfield scheme in respecting the character and integrity of these historic buildings and spaces.

The Eric Reynolds scheme provides a lively and viable alternative which will do far more to regenerate the wider Smithfield area.

The family of Smithfield Market buildings including the General Market and the Annexe, both designed by the City Surveyor Sir Horace Jones, represent the finest collection of surviving Victorian market buildings in Britain.

It has been said that the Henderson proposals are positively the last chance to preserve at least part of the General Market and the Annex. This is simply not true. All attempts over 15 years to pursue a scheme on the lines Mr Reynolds proposes have been rebuffed by the City Corporation and by Thornfield and now Henderson.

Henderson further assert that if they don't get their way they will simply leave the historic buildings to rot. This is outrageous.

What SAVE is asking for is a first chance, not a last chance, to save these splendid market halls, in their entirety. We are ready to start. If Henderson would only take down the hoardings and open up the gates there could be life and activity - and visitors - in the market buildings within weeks.

SAVE is absolutely not seeking to frustrate economic growth. Quite the contrary. As happened at Covent Garden, Spitalfields and elsewhere, we see enormous potential for the market buildings to become a much-visited and popular place that will inject activity and variety into the area, attracting offices and other activity, and thus promoting the increased footfall the new transport connections justify. In the process, the enormous heritage value of the buildings can be preserved for future generations, and this very special Conservation Area enhanced. We believe that this is the balance that should properly be struck.

SAVE has therefore requested that this application be refused planning consent.