



Planning and Transportation Committee

ADDENDUM

Date: TUESDAY, 12 DECEMBER 2023
Time: 10.30 am
Venue: LIVERY HALL - GUILDHALL

6. **CREECHURCH CONSERVATION AREA PROPOSAL**

Report of the Interim Executive Director Environment.

For Decision
(pages 3-6)

10. **INFORMATION REQUIREMENTS FOR THE VALIDATION OF PLANNING APPLICATIONS**

Report of the Director of Planning & Development.

For Decision
(pages 7-8)

Ian Thomas CBE
Town Clerk and Chief Executive

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Addendum Report – Planning and Transportation committee – Tuesday 12 December 2023

Agenda Item 6 – Creechurch Conservation Area Proposal

1. Late representations received

Member of the Public – 1 December 2023

“The Consultation by the City of London Corporation for a NEW continued Conservation Area which would cover the existing 'Creechurch Conservation Area' (incorporating Bevis Marks Synagogue). Is it still possible for me to submit Option 3 (three) concerning this?”

Officer response: the consultation statistics have been updated to reflect this late representation, which would run as follows:

In total 977 (instead of 976) completed responses were received, 943 responses through Commonplace, 31 (instead of 30) via email and three completed hard copies in the last drop-in session

The late rep only mentions Option 3 (so only answers to Question 2 of the Survey).

We reported 84.5% for Option 3 – Question 2. This percentage remains largely the same, shifting only fractionally.

**Originally 825 chose Option 3 out of 976 – 84.528689%
New 826 chose Option 3 out of 977 – 84.544524%**

Resident – 9 December 2023

“Before specifically commenting on the “CCA proposal” document (CCA), I have two complaints:
1. The quality and standard – if flawed as regards its proposed area - of the presentation in the CCA shows up even more clearly how disgraceful the self-serving “appraisal” which produced the Barbican and Golden Lane Conservation Area was. Further, the CCA has only taken four months to reach the designation stage whereas the Barbican one took seventeen months; and
2. Why has my name been redacted from my email at pages 133-138 of Appendix 5 – “Redacted Emails and Hard Copies”?”

As far as the CCA is concerned, I note that, despite the proposals from heritage groups such as the Georgian Group, the Victorian Society, SAVE and the Twentieth Century Society, the proposed eastern boundary of the CCA hasn't changed during the consultation and the western boundary has hardly changed. This, despite the following advice from Historic England on pages 31-34 of Appendix 5:

We note that other heritage bodies have suggested wider boundaries, a lot which include the buildings we are suggesting are incorporated. We consider that our recommended boundary is the minimum area that would capture what is special about the local character of this area, and would allow for its effective management. However, we suggest that you also give careful consideration to other potential additions.

It must be noted that not all buildings will make a positive contribution to the character and appearance of a conservation area and that all the presented options include buildings which are architecturally neutral. In many instances these help to define and reinforce the form and sea le of the historic townscape through appropriate para pet heights, by reinforcing the historic street

pattern and sense of enclosure. The exception to this, and excluded from the City's boundary proposals, is One Creechurch Place, completed in 2016. The scale and appearance of this development is wholly alien to the character of the area. However, its prominent location within the street pattern, as defined by Duke's Place and the historic city wall boundary and its overbearing impact on the proposed conservation area are such that we consider it should be included within the boundary but clearly identified as detracting from the historic and architectural character and appearance of the area. This would facilitate consideration of how such impacts can be mitigated and how opportunities for future enhancement should be managed.

Although Historic England's advice has been acted upon in respect of One Creechurch Place and Cunard House, the requests of the other heritage groups, particularly in respect of Aldgate Underground Station and the adjoining 9 Aldgate High Street (Hotel Saint, formerly Dorsett City Hotel London) have been ignored. The reason given being:

These buildings are individually unlisted, date from various periods and are of differing architectural styles, they amount to a fragmentary survival of historic townscape to the south and east of the Creechurch locality and not particularly representative of its character and appearance; extending the conservation area to include them would risk diluting this. Furthermore, they do not cohere with the elements of special architectural and historic interest identified at section 4.2 below.

The reasoning at 4.2 is at odds with Historic England's advice set out above. The CCA includes Portsoken pavilion "café" – now Aldgate Tap pub - built as part of the Aldgate Square regeneration completed in 2018, for which 4.2 provides no justification. Also included - but anonymously - in the proposal is the proposed Aldgate Centre now under construction within the cartilage of the church. The inclusion of both is welcomed but it is quite clear, including from City Corporation's own publicity - see link below - that both the station and the hotel form an integral part of the area.

As pointed out in my response, paragraph 33 (Detailed Design) of the officer's report to Committee of 05 November 2013, which approved the planning application for the hotel (13/00590/FULMAJ):

33. The building's design is deliberately restrained to ensure an appropriately contextual neighbour to St Botolph Aldgate Church which is the principal focal point in the townscape.

Also, paragraph 39:

39. A key consideration in the scheme's development is the impact on the setting of the church in surrounding views both as a backdrop and a neighbour. The height of the proposal is considered appropriate to the setting of the church following an assessment of surrounding views. In particular moving the west elevation of the building back will result in more "breathing space" and a better relationship between the church and the neighbouring development. The proposed design is restrained and allows the church to retain its architectural prominence. In these respects, the proposal is not considered to harm the setting of St Botolph Church.

There surely have to be payback times in the cases of developments where effect on the setting of heritage assets is constantly massaged or even ignored in order to recommend approval and this is one of them. If 9 Aldgate High Street is in context with St Botolph's, then there is no justification for the exclusion of both it and the station from the CCA. In fact, as there is no mention of the Aldgate Centre in the CCA, perhaps no one bothered to read my response. If anyone did, why isn't the Centre referred to in the CCA?

Appendix 3: Background Papers in the agenda papers for the July P&TC meeting include a draft of the proposal for the conservation area from May 2022 - the proposed boundaries of which mirror, in Map 1, the boundaries of the CCA. That draft also has a plan – Map 2 – of "Heritage Assets" which shows 15 undesignated heritage assets, including the five-year old Aldgate Tap. Also shown on Map 2 are "buildings with negative impact" which are also included in the CCA.

In view of the above, the exclusion of both Aldgate Underground Station and 9 Aldgate High Street lacks both logical and valid justification. Accordingly, the Interim Executive Director's recommendation for the CCA - which notably fails to even mention the same in either paragraph 22 or at all - should be rejected and both Aldgate Underground Station and 9 Aldgate High Street be included in the CCA.

My response also suggested the inclusion of the Grade I listed St Andrew Undershaft and the Grade II listed 38 St Mary Axe, as well as the Gherkin, 30 St Mary Axe. This would mean extending the southern boundary westwards along Leadenhall Street past "Cunard House" to St Mary Axe and then north to Duke's Place. Applying Historic England's recommendation, there is no logical or valid justification for ignoring my suggestion.

In fact, a lot of time, energy and money could be saved were the whole of the Square Mile to be designated a conservation area. For anyone claiming to be proud of the City's heritage and promoting Destination City, it seems to be a "no brainer".

Finally. I was under the impression that undesignated heritage assets are recognised on an ad hoc basis "as and when necessary". However, Map 2 - referred to above - suggests that there is a list and, if so, could I have a copy which covers the whole Square Mile please?"

Officer response: this late representation raises no new substantive issues which are not already addressed in the report and appendices.

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PLANNING & TRANSPORTATION COMMITTEE - 12TH DECEMBER 2023

ADDENDUM – Item 10 - Validation Requirements

The following additional requirement is proposed:

Information Item	Policy Driver	Types of Application	<u>When or what information is required</u>
Air Quality Positive Assessment	<p>Policy SI1 Improving Air Quality of the London Plan</p> <p>Policy SD4 CAZ of the London Plan</p> <p>London Plan Guidance: Air Quality Positive – February 2023</p>	<p>Required for development sites subject to an EIA. They are encouraged for major developments.</p>	<p>The Air Quality Positive Statement must consider what measures have been taken during the design stages to achieve the best possible outcomes for air quality. These should include design and layout, transport, energy, any combustion plant/flues, standby generators and innovation and future proofing.</p>

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