

Appendix 3: Background Papers

**PROPOSED BEVIS MARKS/CREECHURCH
CONSERVATION AREA**

(INSERT PHOTOGRAPH)

XX May 2022

DRAFT

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1. BACKGROUND AND SUMMARY

- 1.01 The Planning (Listed Buildings and Conservation Areas) Act 1990 Section 69(1) requires local planning authorities, from time to time, to determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and to designate those areas as conservation areas. It is the duty under Section 69(2) of the Act of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas.
- 1.02 This document proposes the designation of a new conservation area in the Bevis Marks/Creechurch Lane area within the part of the City of London. The area proposed for designation contains a number of statutorily listed buildings which are of outstanding and exceptional heritage significance. Three are Grade I listed, and one is Grade II*. There are also several Grade II listed buildings. The area also contains an important collection of non-designated heritage assets for which at present there is no special protection. The area comprises a network of narrow lanes and passages which are an important survivor of the City's historic medieval street pattern. Despite the proximity to the cluster of tall buildings in the eastern part of the City, the area under consideration has a remarkably consistent and harmonious low-rise scale of buildings with similar parapet heights which results in a consistent and uniform townscape fronting the narrow streets. As well as architectural interest the area also has an extraordinarily high historic and archaeological interest, and a deep social and cultural history.
- 1.03 The existing character and appearance of the area, together with the setting of several highly graded statutorily listed buildings, such as the Synagogue in Bevis Marks, has been threatened by two recent planning applications for very tall buildings on sites within the area, namely 33 Creechurch Lane (Ref.18/00305/FULMAJ), awaiting determination, and 31 Bury Street (Ref. 20/00848/FULEIA) which was refused planning permission on 5th October 2021, against officer advice.

1.04 It is considered that the designation of a new conservation area, and the adoption of policies for preservation and enhancement, would greatly assist in the protection of the setting of the listed buildings, as well as affording a degree of protection to undesignated heritage assets which front several of the nearby streets.

2. EXISTING CONSERVATION AREAS AND HERITAGE ASSETS NEARBY

2.01 There are two existing conservation areas fairly close to, but not abutting, the area under consideration. The Lloyds Avenue Conservation Area, designated in 1981 and modestly extended in 2007, is focussed on the Edwardian street of Lloyds Avenue, between Fenchurch Street and Crutched Friars. St Helen's Place Conservation Area, also designated in 1981, and extended in 1998, is centred on those buildings that define the space of St Helen's Place and those which contribute to the setting of the Parish Church of St Helen's.

2.02 Both these small conservation areas have very distinctive characters, with clear and logical boundaries. There is no obvious or logical case for their extension to include any of the area which is being considered in this document for a new Bevis Marks/Creechurch conservation area.

2.03 No.38 St Mary Axe is a nearby Grade II listed building, but it is separated from the area under consideration in this report by modern tall buildings on the west side of Bury Street. There is no visual, historic, or functional linkage to the east side of Bury Street or to Bevis Marks, and therefore there is no logical reason to extend the boundaries of the proposed new conservation area to include No.38 St Mary Axe.

3. PROPOSED BOUNDARIES

3.01 The proposed boundaries of a new Bevis Marks/Creechurch Conservation Area are shown on Map 1. They are drawn to run down the centreline of roads, with the exception of Cunard Place and the pedestrian passageway through to Leadenhall Street.

4. HERITAGE SIGNIFICANCE

- 4.01 If the area under consideration becomes designated as a conservation area, then the area, as a whole and in part, becomes a designated heritage asset. It is essential, as part of the designation process, that the significance of the heritage asset is carefully assessed so that its special architectural and historic character and appearance is clearly identified.
- 4.02 National Planning Policy Framework Annex 2 states that significance is the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from its physical presence but also from its setting. These criteria accord broadly with those set out in Historic England's Conservation Principles, namely evidential, historical, aesthetic, and communal. The heritage significance is set out below.

Archaeological

- 4.03 The City of London is the historic centre of London, with a rich history of monuments and archaeological remains surviving from all periods. It is an historic landscape which has shaped and influenced the modern townscape. There has been almost continuous occupation of the City from the initial Roman settlement, with some evidence suggesting earlier occupation. The development of the City is contained within the visible and buried monuments and archaeological remains. The history of settlement has led to the build-up and development of a very complex, and in some areas, deep archaeological sequence. Later building development and basement construction has partly eroded the archaeological evidence, and in some areas remains have been lost with no record or an incomplete record of only part of a site. *(This paragraph derives from the City of London's standard Conservation Area Character Summary documents)*
- 4.04 Archaeological investigations have produced evidence of multi-period defensive and domestic occupation in the area. Most notable are the discoveries of highly significant archaeological remains relating to the City's Roman walls and buildings, and the early medieval Holy Trinity Priory precinct, the former site of which is now bounded by Duke's Place, Aldgate, Leadenhall Street and

Creechurch/Heneage Lane. The source base of the archaeology comprises primary sources including strata, finds, and structures found both above and below-ground. For the post-medieval period this is supported by secondary sources including documentary and map evidence. The development of the former Holy Trinity Priory precinct is now understood in detail through recourse to both primary and secondary sources.

- 4.05 The Roman period archaeological deposits are highly significant for providing evidence of the development of the City's walls in two key phases, specifically the evidence for the original wall and one of its gates, Aldgate, which were constructed in the late 2nd or early 3rd century when the City was first enclosed and the addition of bastions or interval towers to the eastern and north-eastern sections, concentrated in the area of Duke's Place, in the late 4th century. Excavations on Leadenhall Street have also revealed evidence for intense Roman activity featuring successive occupation layers and notably two buildings which had undergone several phases of reconstruction and repair. These are significant for informing our understanding of the layout of the Roman settlement and building typologies and materials.
- 4.06 Evidence for the Saxon period is limited in the City due to the focus of settlement having been outside of the walls about a mile to the west at what is now Aldwych. The discovery of possible Late Saxon period strata and finds including burials which suggest a graveyard in the area is therefore highly significant when taken in the context of current understanding on where settlement activity was focused during that period.
- 4.07 The highly significant archaeological evidence revealed by excavations in the area focused on the former site of the Holy Trinity Priory, Aldgate precinct has contributed to important studies of both London monastic institutions and the effect of the Dissolution on religious precincts. This has previously been described as a neglected subject which has now been substantially informed by the evidence derived from the area. The establishment of the Holy Trinity Priory within the walls is in itself very informative in the understanding of land use in the early medieval period and is also suggestive of its importance. The precinct covered a large area, and its location is suggestive of the availability of space in the eastern part of the City during that period, and when many other religious houses were founded

outside the walls. It is now understood that the area was largely uninhabited until the Priory was founded in 1107-08 and after which and into the early 12th century much of the basic street pattern was developed. As it expanded, the Priory continued to impact the topography of the area with its enclosure of existing lanes including a length of what is now Duke's Place which was enclosed in the 13th century and then reopened after the Dissolution.

- 4.08 Using both primary and secondary sources, it has also been possible to understand the development of the precinct and the wider area in the post-medieval period and its multi-occupation and mixed-use character. Of particular significance, is the evidence for new industries introduced by immigrants, particularly the production of delftware by the Flemish potter Jacob Jansen and others in the former Priory precinct in the late 16th century.
- 4.09 As the City grew in importance as a financial centre from the mid-19th century, its prevailing character changed from that of residential - industrial to commercial with an attendant depopulation as houses were cleared for offices, warehouses, and railway stations. The redevelopment of the area for commercial use resulted in the removal of both above- and below-ground structures and archaeological deposits of medieval and post-medieval date, much of it because of the construction of office buildings and the excavation of basements. Notwithstanding this, there is still evidence of these earlier periods in the historic buildings of the area including the tower of the Guild Church of St Katharine Cree that incorporates elements of the Priory, and the mid-18th century Bevis Marks Synagogue. These buildings contribute directly to the sense of place and provide a tangible source of further understanding of the special archaeological interest of the area.

Historical

- 4.10 The area has special historical interest arising from its associations with notable and important foundations and individuals. Foremost amongst these for representing the most tangible connection between the historic place and people is the Jewish community who have been an enduring presence in the area since their resettlement in England in the mid-17th century.

- 4.11 During the medieval period, the Holy Trinity Priory, Aldgate dominated the area. Founded by King Henry I's Queen, Matilda, it was one of the most important monastic houses and one of the earliest Augustinian houses to be established in England. By the late 12th century / early 13th century, the precinct covered a large area and comprised imposing stone buildings, including a large and architecturally impressive church, the site of which is now bisected by Mitre Street, and a cloister now represented by Mitre Square. The church was the burial place of two of the children of King Stephen in the mid-12th century and of London's first mayor, Henry FitzAilwin. A tangible connection can be made to this important early part of the area's history through the fragments of the Priory precinct that survive in situ above ground. These comprise the lower part of the tower to the Guild Church of St Katharine Cree, the garden of which is the last remaining portion of the medieval churchyard, and a 13th century arch from the Priory church now contained in a nearby office building.
- 4.11 The Holy Trinity Priory was the first monastic house to be dissolved in 1532 and the property was granted to Thomas Audley, soon to be Lord Chancellor, who began to redevelop the precinct. This included converting the chapels around the choir of the monastic church into tenements. Attendant with the change of use to residential was the emergence of the former precinct as an important place for new and innovative industry in the late 16th century. It was home, as was the area generally and as remains today, to a diverse community. At that time, it was a focus for immigrants fleeing religious persecution, amongst which were Jacob Jansen and Jasper Andries, potters originally from Antwerp who had set up a small pottery there by 1571 and are believed to have produced the first tin-glazed or delftware pottery in England.
- 4.12 A key contributor to the special historical interest of the area is the association with the very highly significant historic, established, and most importantly, enduring Jewish community that was concentrated in the City and to the east up until the early 19th century. The area is also of very high significance for the community as it was on Creechurch Lane that the first synagogue was established in England for public worship after the expulsion of the Jews in 1260. Its name "Sha'ar Hashamayim" ("Heaven's Gate") is notable given its location near the Roman Aldgate.

- 4.13 By the end of the 17th century the Ashkenazi (originating from northern and eastern Europe) Jewish community had grown to such an extent that they moved to a new building, The Great Synagogue situated on what is now Duke's Place. The congregation continued to grow in the 18th century and in 1722 and then between 1788 and 1790, larger replacement synagogues were built on the site. The third and final synagogue of 1788-90 was destroyed by German bombs in 1941.
- 4.14 In 1688, many Sephardi (originating from the Iberian Peninsula) Jews from Holland settled in the area growing the community. Consequently, the Sephardi congregation needed a larger space for worship. In response, the Bevis Marks Synagogue was constructed between 1699 and 1701 to the designs of Joseph Avis, a master builder and Quaker who had previously worked with Christopher Wren. It is of exceptional historical interest and notable for remaining little altered and being the oldest synagogue in the country. Importantly, it remains the focus of religious, communal, and educational activities to this day and is the only synagogue in Europe that has held regular services continuously for over 300 years. It represents tangible evidence for the historic and on-going relationship that Jews have had with this part of the City.
- 4.15 A notable, and now one might say, notorious historical figure with an association with the area is Sir John Cass (1661 – 1718) who in 1710 founded a school in the churchyard of St Botolph without Aldgate. Cass held the position of Sheriff in the same year. He represented the City in two Parliaments and was knighted in 1712. The school that he founded is now accommodated in a Grade II* building of 1908 situated opposite the church. Cass was a philanthropist who established a foundation in 1748 to support disadvantaged young people in London. Newly acquired knowledge obtained on behalf of the former Sir John Cass's Foundation, now The Portal Trust, has demonstrated his role in investing and active management of the slave trade. Consequently, his legacy has been re-evaluated resulting in the re-naming of the foundation. Notwithstanding this, the area's association with an influential figure in late 17th century and early 18th century London and one who was, it seems instrumental in the slave trade needs to be acknowledged for furthering our contextual knowledge and understanding of the period and the history of the area.

Architectural

4.16 The area contains a considerable number of buildings of outstanding architectural interest, recognised by statutory listing. However, there is also a concentration of non-listed buildings or structures that are of local architectural interest, including good examples of late 19th century warehouses, inter-war commercial buildings and post-war offices. There are also several quite recent buildings of architectural interest. The close proximity of buildings of different ages and contrasting styles but of similar height and massing gives the area a special and distinctive quality. The quality of each individual building in the area is assessed in the section below, but it is their ensemble that gives the area its very special architectural quality.

Artistic/Cultural

4.17 Although now dominated by offices, the area retains a vibrant and diverse community with religious organisations playing an important welfare role in providing a religious focus and social, and educational activities. These organisations, specifically, the Bevis Marks Synagogue, the Guild Church of St Katharine Cree, and the church of St Botolph Without Aldgate serve a multi-generational and diverse community. They contribute to the wellbeing of their congregants, residents, City workers and visitors to the area who are attracted by the opportunities for religious observance, education, and recreation. Formal education is provided at The Aldgate School run by The Portal Trust (formerly the Sir John Cass's Foundation) which is the only state-funded school in the City and the only primary school. Consequently, there are large numbers of people who over a considerable period, have or had collective memories of their experiences of the area and strong associations with it.

4.18 The Sephardi community at Bevis Marks have a deep and established connection with the area and the synagogue continues to remain the focus of religious and communal life as it has since it opened over 300 years ago. The mission of the Guild Church of St Katharine Cree is to concentrate on those who work in the City in precarious, low paid or 'hidden' occupations. For many years, the church of St Botolph Without Aldgate was synonymous with the work for the homeless caring for hundreds of people a day. Although this work has discontinued, it still plays an important role in the community for hosting weddings and concerts.

4.19 Aldgate Square is the very popular green heart of the area providing respite from the intensity of City life and the dominant built environment. It also hosts temporary site-specific public artwork as part of a new biannual commission, the Sculpture in the City Aldgate Square Commission, that supports emerging artists in the UK. This is an important initiative for community engagement as the site-specific element is influenced through the process of the artists developing their proposals in collaboration with the local community. The artists are directed to consider and respond to the cultural and historical significance of the local area and the collaborative process is important for community to express what is important and meaningful to them.

5. ASSESSMENT OF INDIVIDUAL BUILDINGS

5.01 Map 2 shows the location of existing statutorily listed buildings; other buildings that are suggested to be non-designated heritage assets because of their architectural or historic significance which contribute positively to the character or appearance of the area; buildings which are considered to have no particular architectural or historic interest but whose scale and massing is sympathetic to the character and appearance of the area; and those which are suggested to have a negative or harmful impact on the character or appearance of the area. These are described below:

Aldgate Square and High Street

5.02 St Botolph's Church and attached railings and gate to yard, Grade I listed, 1741-4 by George Dance the elder, and one of the City's fine post-Fire churches, of very high heritage significance architecturally and historically. The elegant tower and spire are an important local landmark. The setting of the church has been greatly improved by the new public realm created at Aldgate Square, designed by Gillespies. The new Aldgate Centre, designed by Edwards Wilson Architects, currently under construction on the east side of the church, facing onto Botolph Row, promises to provide a useful extension to the church and to make a positive contribution to the character and appearance of the area.

- 5.03 Police Call Box, outside St Botolph's church, grade II listed, c.1935, historic street furniture.
- 5.04 Metropolitan Drinking Fountain, outside St Botolph's church, 1906, historic street furniture.
- 5.05 Portsoken Pavilion Café, 2018 by MAKE Architects, part of the newly created public realm which greatly enhances this part of Aldgate. Though very new, it is architecturally interesting and makes a positive contribution to the character of the area.

Bevis Marks

- 5.06 Bevis Marks Sephardi Synagogue Grade I listed, is the world's oldest synagogue in continuous worship, constructed in 1699-1701. It is a heritage asset of international importance and at the highest level of significance in terms of all the criteria of heritage value. Set back from the street, as required at the time of its construction, and accessed through an archway on the street frontage into a small courtyard, its site is constrained by surrounding buildings whose modest scale is critical in terms of preserving the setting of the Synagogue and the quality of the internal space.
- 5.07 Nos. 10-16 Biiba House, south side between Bury Street and Heneage Place, 1970s pale orange brick, divided into six three-window bays, with arcaded ground floor, four storeys with set-back fifth floor, making a neutral contribution to the character and appearance of the area. At first floor it contains the reset 19th century pediment marking the entrance to the Synagogue to the rear, a feature which contributes positively to the area. The scale of the building as a whole is entirely appropriate and contributes to the setting of the Synagogue to the rear.
- 5.08 No. 17 Creechurch House, 1935 warehouse by Lewis Solomon, seven storeys plus two set-back metal spandrels between windows and stone columns, splayed corners to Houndsditch and Bevis Marks, Art Deco detail, including original multi-paned metal Crittall windows, makes a positive contribution architecturally.
- 5.09 No. 18 John Stow House, built originally as an extension to No. 17 in 1962-6 by Theo Birks, eight storeys, H-plan with set-back to allow for road widening, is of no particular architectural interest, but its scale is appropriate.

- 5.10 Nos.19-22 Four storey plus one set back, architecturally undistinguished range with vacant ground floor shops, makes a neutral contribution to the street.
- 5.11 No. 24 Bevis Marks House retains 1920s stone corner turret and frontage to Bevis Marks which contributes positively to the area. The rear, including elevation to Houndsditch and Goring Street is five storeys, 1983 by Ivan Starkin, heavily modelled granite clad facades, of no architectural or historic interest, but appropriate scale, making a neutral contribution.

Bury Street

- 5.12 Nos. 1-4 and 32 Holland House Grade II*, of outstanding heritage significance designed by the Dutch architect H.P.Berlage, built 1914-16, with interiors by Henri van de Velde, in a remarkably idiosyncratic style and with unusual materials. Western frontage five storeys plus one set back, south elevation four storeys with two set back, either side of Nos.33-34.
- 5.13 Nos. 5-10 Long polished granite façade, 1977 by Hildebrandt & Glicker, five stories to parapet, with two raked-back floors. Pale brick rear elevation is important to the setting of the yard of the Synagogue. While of no particular historic or architectural interest its scale is sympathetic to its immediate neighbours, exactly matching the parapet height of Holland House.
- 5.14 No.12 Early 19th century five-bay house, with rusticated ground floor, built after most of Bury Street had been burnt in a fire in 1811. Recently restored with two additional floors set back to be invisible from the street. Consistent parapet height with its neighbours on each side, and its rear brick elevation provides an attractive enclosure to the courtyard of the Bevis Marks Synagogue. It makes a positive contribution to the area and should be considered as an undesignated heritage asset.
- 5.15 No. 31 Extension to Holland House by Gotch & Partners 1967, five storeys plus two set-back floors, architecturally undistinguished but an appropriate scale for its highly significant neighbours.
- 5.16 Nos.33-34 Edwardian commercial building, 1912 by Delissa Joseph for Messrs. Budge, grain dealers. Classical neo-French fin

de siècle style, Portland stone, four storeys plus mansard, forms a fine corner around which wraps Holland House.

Creechurch Lane

- 5.17 Nos. 2-16 Creechurch Buildings, Grade II listed, 1885 former tea warehouse, five storeys, brick, and stucco, by Franklin S. King, comprising frontage and rear blocks including inner courtyard accessed through archway. Well preserved including cranes and iron swing hoists to loading bays. It has high heritage significance both architecturally and historically as evidence of the warehouse activities that once dominated this part of the City. Upper floors converted to residential use.
- 5.18 Nos. 18-20 Cree House, remarkably florid red-brick, and terracotta warehouse, 1891-2 by M.E. Collins for Phillips & Co. fruiterers. Arcaded ground floor with banded voussoirs originally accommodated fruit stalls. Lavish carved terracotta decoration. Surprisingly not statutorily listed but should be considered as a non-designated heritage asset. Historic parish boundary marker plaques survive on street elevation.
- 5.19 Nos. 22-24 Five storey former tea warehouses, 1895, yellow brick with red dressings above, and stone-faced shopfronts. North elevation formerly facing Creechurch Place, or St James Place, is equally good. Makes a positive contribution to the area and should be considered as a non-designated heritage asset.
- 5.20 No.33 Arthur Castle House, five storey office 1978-81 by the Architects' Comprehensive Design Group, occupies a wedge-shaped island block with long elevations to Creechurch Lane and Heneage Lane, and a narrower frontage to Bevis Marks, polished Sardinian granite, bronze panelling, and uniform flush windows. It is of no architectural or historic distinction, but its scale is appropriate for its position.

Duke's Place

- 5.21 One Creechurch Place, 19 storey office tower, completed 2017, by Sheppard Robson Architects, in black metal and glass. T-shaped plan, with new public realm facing Mitre Street. The enormous scale is inappropriate for its surroundings, the colour and materials used are alien to its context, and at ground floor level the building

makes a dismal contribution to the street, the open space, and the public realm. It detracts from the setting of St Botolph's Church when viewed across Aldgate Square and the Aldgate School which it abuts. Overall, it has a negative impact on the area.

- 5.22 No. 30 Irongate House, 1973-8 by Fitzroy Robinson Partnership, seven storeys, recessed ground floor supported on pillars, upper floors vertical windows heavily recessed in polished red South African granite. The black veins of this Parys granite is evidence of ancient meteorite impact, of considerable interest to urban geologists. The building well-proportioned and is an appropriate scale for its prominent position with three street frontages to Duke's Place, Houndsditch, and the new Aldgate Square public space. It makes a positive contribution architecturally.
- 5.23 Nos. 32-38 Duke's House, 1962 by Richard Seifert Architects, eight storey offices, stone-faced with polished mullions, set back on Duke's Place and Houndsditch for road widening. It has little architectural or historic interest, but its scale is appropriate for the area.
- 5.24 No. 40 Greenly House by Levin Solomon, Son & Joseph, 1950, in pre-war classical style, five storeys stone clad, plus mansard with dormers above heavily dentilled cornice. Makes a positive contribution to the area.
- 5.25 Remains of Roman wall, bastions, and city gate of Aldgate. Significant amounts of historic fabric survive in basements, up to 2.5 metres high, and buried below street level, Scheduled Ancient Monument comprising archaeology of very high significance (see Map 3)

Heneage Lane

- 5.26 No. 2 Vestry House for Synagogue, 1880s, red brick, four storeys, asymmetric composition, Arts & Crafts style. Makes a positive contribution to the area. Because of its functional connection it could justifiably be considered to be part of the cartilage of the adjacent statutorily listed synagogue.
- 5.27 No. 4 Annex to Synagogue, 1880s, three storeys, ground and first in red brick, rendered second floor. Makes a positive contribution to the area, and like the Vestry House might be considered part of

the cartilage of the statutorily listed synagogue. Between Nos. 2 and 4 lies the east end elevation of the Bevis Marks Synagogue (see Bevis Marks above)

- 5.28 Valiant House, five storeys plus two set-back floors, offices by Peter Black & Partners 1978-81, with pilotis carrying it over the yard entrance off Heneage Lane. Though of no architectural merit it is an appropriate scale for the street.
- 5.29 East side of Heneage Lane comprises the west elevation of Arthur Castle House (see No.33 Creechurch Lane).

Houndsditch

- 5.30 Nos. 31-36 Northern section and frontage of John Stow House (see No.18 Bevis Marks) eight storeys set back for road widening but projecting ground floor developed in 1980s for the Lion PH.
- 5.31 No.37 Narrow fronted 1930s, three storey plus one set back, modest Art Deco details, makes a minor positive contribution.
- 5.32 Nos. 38-9 Utilitarian 1950s office, five storeys, narrow frontage but strong horizontal windows, slightly set back frontage, of little architectural or historic interest but modest in scale.
- 5.33 Nos. 40-41 Portland stone 1920s commercial building, four storeys plus double mansard, rusticated stone quoins, dentilled cornice at second floor, dormers with copper cladding, makes a positive contribution to the character of the street.

Leadenhall Street

- 5.34 Church of St Katharine Cree, Grade I listed, and the most important church built in London between Inigo Jones and Christopher Wren, nave dating from 1628-31 although the tower is medieval, surmounted by mid 18th century cupola. It is one of the few pre-Fire churches in the City that also escaped serious war damage. With its modest yet distinctive tower and cupola on the corner with Creechurch Lane, and its low frontage to Leadenhall Street, the setting and backdrop of views of St Katharine Cree is particularly important. The delicately exquisite sundial on the Leadenhall Street elevation is a remarkable feature, dating from 1706.

- 5.35 No.76 Swiss Re House, 1986-7 by Gollins Melvin Ward, forms the acute corner with Mitre Street, five storeys with two additional floors set-back, curved flat-iron corner, an appropriate scale for its position. Inside the main entrance foyer and incorporated into the new fabric is a remarkable fragment of the Augustinian Holy Trinity Priory, comprising a tall late 14th century Gothic window arch, This is statutorily listed Grade II, and together with other fragments preserved in the basements is an important part of the area's medieval history and archaeology.
- 5.36 No.78 five storey office building with two set-back roof storeys, 1989-91 by Ley, Colbeck & Partners, stone-clad, highly modelled with post-modernist detailing, and linking behind No.76 with Nos. 32-40 Mitre Street. Its scale is appropriate for the area.
- 5.37 No.80-84 five storey offices with set-back additional floors, 1990, by Hamilton Associates, with well-articulated post-modernist detailing, using high quality materials. It might be considered to have limited architectural or historic interest, but it is an appropriate scale for its location.
- 5.38 No.88 Cunard House six storeys, limestone facing, with recessed 7th floor, 1999 by Fitzroy Robinson, sub-classical style, with inverse curved corner with Creechurch Lane, referencing the magnificent 1930s Art Deco building by Mewes & Davis which previously stood on the site. It incorporates details from the previous building including nautically inspired metalwork to the ground floor and plaque from the old building on the curved corner to Creechurch Lane. The scale reduces to the north to reflect the listed tea warehouse opposite. The north-east corner with Bury Street incorporates a historic City Corporation plaque marking the Site of the First Synagogue 1657 – 1701. Overall, Cunard House makes a positive contribution to the area.

Mitre Street

- 5.39 Nos 27-28, warehouse 1891 by F. Adam Smith, five storeys, with elliptical windows and chamfered vertical columns, very fine example of its period, which makes a very positive contribution to the street, and should be considered as an undesignated heritage asset. Ground floor is now the Trinity Bell PH.

- 5.40 Nos. 29-31 five storey warehouses 1888, with three full height loading bays, similar to Creechurch Lane tea warehouse, but unlisted. Should be considered as an undesignated heritage asset.
- 5.41 Nos.32-40 flat-fronted in stone with inset convex entrance bay, five storeys with set-back roof storeys, 1989-91 by Ley, Colbeck & Partners, part of No.78 Leadenhall Street. Architecturally undistinguished, it nevertheless is the correct scale for the street and makes a neutral contribution.
- 5.42 Churchyard of St Katharine Cree, accessed via a narrow pedestrian way up a flight of steps at the west end of Nos. 32-40, completely enclosed by surrounding buildings, contains a Portland stone door case dated 1631 formerly facing Leadenhall Street east of the church, built by William Avenon, Goldsmith. It is statutorily listed Grade II, and now frames a fountain of 1965 when the churchyard was laid out as a garden by Donald Insall architect. The churchyard contains several chest tombs and sarcophagi which are all of heritage significance.
- 5.43 Nos. 12-14 Five storey warehouses, reconstructed as facsimiles in 1983-5 by Weightman & Bullen, to match the tea warehouses in Creechurch Lane. The rear elevation provides the south side of Sugar Baker's Court. The range admirably complements the historic warehouses opposite and makes a positive contribution to the area.

St James's Passage

- 5.44 Aldgate School, formerly Sir John Cass Foundation Primary School. Statutorily listed Grade II. Built in 1908 by A.W. Cooksy in a 'cheerful Neo-Hampton Court Baroque' style, with main elevation in brick and stone with central cupola, facing east onto the new pedestrian Aldgate Square. Two entrances with figures of charity children relocated from earlier site in Houndsditch. Secondary frontages of L-shaped plan to Aldgate High Street and Mitre Street.
- 5.45 Boundary wall to school, modern dark brick wall plinth surmounted by high railings, copy of traditional design. Contributes positively to the character of the area and the setting of the listed school. The wall to St James's Passage contains an

historic City Corporation plaque ‘Site of Holy Trinity Priory’ and a modern information plaque.

Sugar Baker’s Court

- 5.46 A narrow dead-end court, first laid out in 1586, north side with former shop fronts, part of Nos.22-24 Creechurch Lane. Contributes positively to the historic and architectural character of the area.

6. TOWNSCAPE AND VIEWS

- 6.01 It is clear from the analysis of individual buildings that they comprise a remarkable mixture of different ages, styles and uses. As an ensemble their juxtaposition and group value are also an important consideration, in addition to their individual merits. The network of narrow lanes fronted by buildings of a largely uniform scale, albeit with a variety of architectural styles, creates a harmonious townscape with a particularly strong character.
- 6.02 The group of warehouse buildings in Creechurch Lane and Mitre Street, which are some of the best surviving examples in the City, or the uniform parapet height along the entire length of Bury Street, constitute a special character and appearance that is worthy of preservation.
- 6.03 The majority of 20th century buildings in the area, although of varied architectural merit were also designed to a height, scale and massing that is sympathetic with their neighbours. Generally, parapet heights are five storeys with any additional storeys set back so as not to have any impact on the street. Modern buildings on Houndsditch and Duke’s Place are higher, but mostly a consistent scale of seven or eight storeys.
- 6.04 The new public open space at Aldgate Square has enormously enhanced the area and greatly improved the setting of the Aldgate School and St. Botolph’s Church, creating an open townscape which contrasts with the narrow lanes.

6.05 From within the area, or very close to it, there are important townscape views which contribute very positively to the character and appearance of the area. These are shown on Map 4 and include:

- views of St Katharine Cree from south side of Leadenhall Street
- view down Heneage Lane from Bevis Marks
- view of St Botolph's Aldgate from south side of Aldgate High Street
- view towards Bury Street from plaza south-east of St Mary Axe
- view down Mitre Street from Leadenhall Street
- view from Sugar Baker's Court across Creechurch Lane towards the Gherkin

6.06 The predominantly low scale of the area under consideration is a major factor in the setting of the high-status listed buildings in the area, particularly the three Grade I places of worship. The preservation of the existing scale of this area would help to ensure that their setting continues to be protected and provide a buffer against the cluster of tall buildings to the south and west.

6.07 The area under consideration also lies within a zone where tall buildings potentially affect background views of the Tower of London World Heritage Site, particularly in views from Tower Bridge and the south bank of the river. The modest scale of the vast majority of the existing buildings within the area means that nothing at present impinges on those sensitive views.

7. PUBLIC REALM

7.01 Areas of important public realm are shown on Map 5.

The newly landscaped public realm at Aldgate Square, including St Botolph's churchyard, and the smaller landscaped space fronting Mitre Street/St James's Passage are important recent improvements to the area. The map also shows areas which are in private ownership with occasional or controlled public access, but which nevertheless contribute to the character and appearance of the area.

7.02 The quality of paving is very mixed. There is one stretch of old York stone paving on the north side of Bevis Marks from Nos. 18 – 24. There are larger areas of good quality new sawn York stone paving, such as Heneage Lane with its heritage-style streetlamps, but many stretches of existing pavement comprise poor quality

asphalt or concrete. These include most of Creechurch Lane and Bury Street, the north side of Leadenhall Street, Mitre Street, Sugar Baker Court and parts of Houndsditch.

- 7.03 The 19th century cast-iron City of London cannon bollard at the south-west corner of Bury Street is an important survivor and should be regarded as an undesignated heritage asset.

8. LAND USE

8.01 As well as the physical appearance of the area, its buildings, streets and spaces, land use is also an important factor in identifying the special character of the area. While the majority of the buildings are in commercial office use, there are also three very important places of worship with significant congregations and activities. The Aldgate School brings in children, teachers, and parents from a considerable catchment area. Several of the upper floors of former warehouse buildings in Creechurch Lane and Mitre Street have been converted to residential use. There are also a few ground floor restaurants and bars, several now vacant because of the loss in trade due to the pandemic.

8.02 The area, because of its history and iconic buildings also draw many tourists and visitors, which brings a welcome amount of life to the area particularly at weekends. These varied activities and the footfall they generate contribute to the character of the area.

9. PROPOSALS FOR PRESERVATION AND ENHANCEMENT

9.01 Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas. Proposals have to be subject to public consultation to which the local planning authority has to pay due regard.

9.02 Designation of a conservation area is therefore only the first step. A clear understanding of the heritage significance of the conservation area as a whole, as well as individual sites and buildings within it, is necessary for the formulation of proposals and policies which

will enable the local planning authority to preserve and enhance those special qualities.

9.03 In the case of the proposed Bevis Marks/Creechurch Conservation Area it is suggested that the following policies could be appropriate:

- a strong presumption to retain all designated and undesignated heritage assets in the area
- retention of the existing historic street pattern, and restoration of historic building lines where they have been lost
- establish clear guidance for parapet heights fronting the street and for set-back floors for the redevelopment or alteration of all those existing buildings or sites which have a neutral or negative impact on the character or appearance of the area
- identify landmarks whose setting is sensitive to change
- define street views which need to be protected
- proposals to enhance the public realm including paving proposals to enhance public information and visitor experience, including marking the position of the below-ground remains of London Wall and the Aldgate

9.04 In terms of archaeology, it is also suggested that the management strategy incorporates the same requirements and approach as those for other conservation areas, specifically:

- where developments are proposed which involve new groundworks an historic environment assessment, including an assessment of the archaeological potential and impact of the proposals will be required as part of the planning application. Where significant remains survive, consideration will be given to amendments to the proposals to ensure that disturbance to archaeological remains is minimised or reduced.
- the City Corporation will indicate the potential of a site, its relative importance, and the likely impact to a developer at an early stage so that the appropriate assessment and design development can be undertaken. Developers should refer to Planning Advice Note 3: Archaeology in the City of London, and Conservation Areas in the City of London: A General Introduction to their Character for further information. *(These bullet points derive from the City of London's standard Conservation Area Character Summary documents).*

10. CONCLUSION

10.01 It is concluded that the area under consideration possesses a high degree of heritage significance that justifies serious consideration for designation as a conservation area. The ensemble of buildings and the street pattern, together with their historical, archaeological, and social/communal context, comprise an area of special architectural and historic interest whose character and appearance it would be desirable to preserve and enhance. It fully meets the criteria set down by the Planning Act 1990.

Alec Forshaw and Esther Robinson Wild
May 2022

Alec Forshaw was Principal Conservation and Design Officer for the London Borough of Islington, where he worked from 1975 – 2007. He has written widely on historical and architectural matters, including *New City, Contemporary Architecture in the City of London* (2013), *The Barbican, Architecture and Light* (2015), and *Smithfield, Past, Present and Future* (2015). He gave evidence on behalf of SAVE Britain's Heritage in support of the City of London's refusal of planning and listed building consent at the Custom House Public Inquiry in February 2022.

Esther Robinson Wild MA MCifA FSA is a Historic Environment Consultant with extensive experience of working on wide range of projects in all areas of the historic environment including listed buildings, historic buildings and places, conservation areas and archaeology. She is a member of the Board of Directors of the Chartered Institute for Archaeologists (CifA) and a CifA accredited member (MCifA). She has contributed to several conservation themed publications including *Save Britain's Heritage Too good to lose. Historic schools at risk* (2018) and *The Twentieth Century Society's 100 20th Century Gardens and Landscapes* (2020).

ACKNOWLEDGEMENTS

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Historic England: The National Heritage List for England

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St Botolph Without Aldgate

<https://www.stbotolphs.org.uk/>

The Guild Church of St Katharine Cree

<https://www.stkatharinecree.org/>

The Portal Trust

<https://portaltrust.org/about-us/resources/sir-john-cass-and-transatlantic-slavery>

The Sephardi Community Bevis Marks

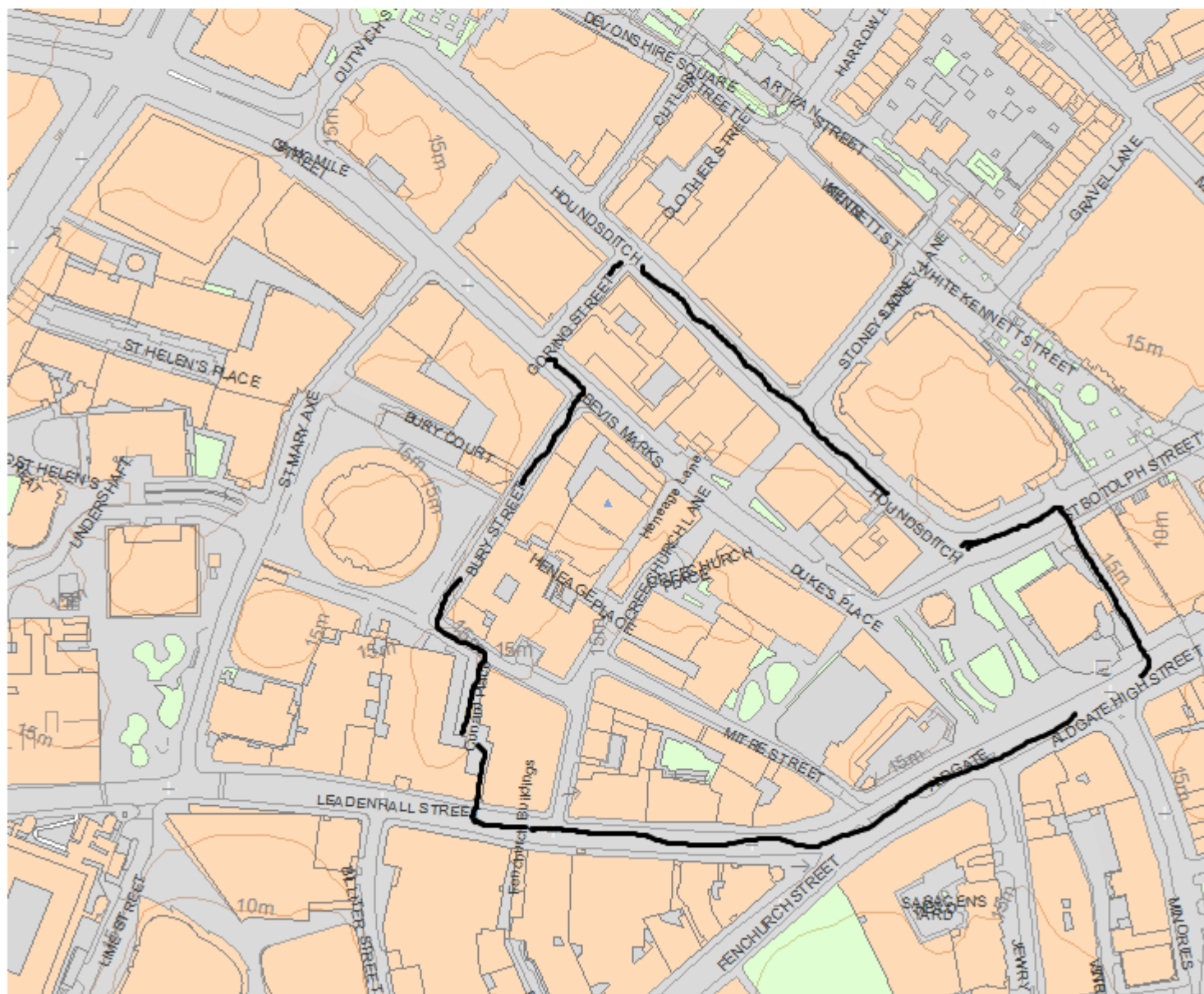
<https://www.sephardi.org.uk/bevis-marks/>

MAPS

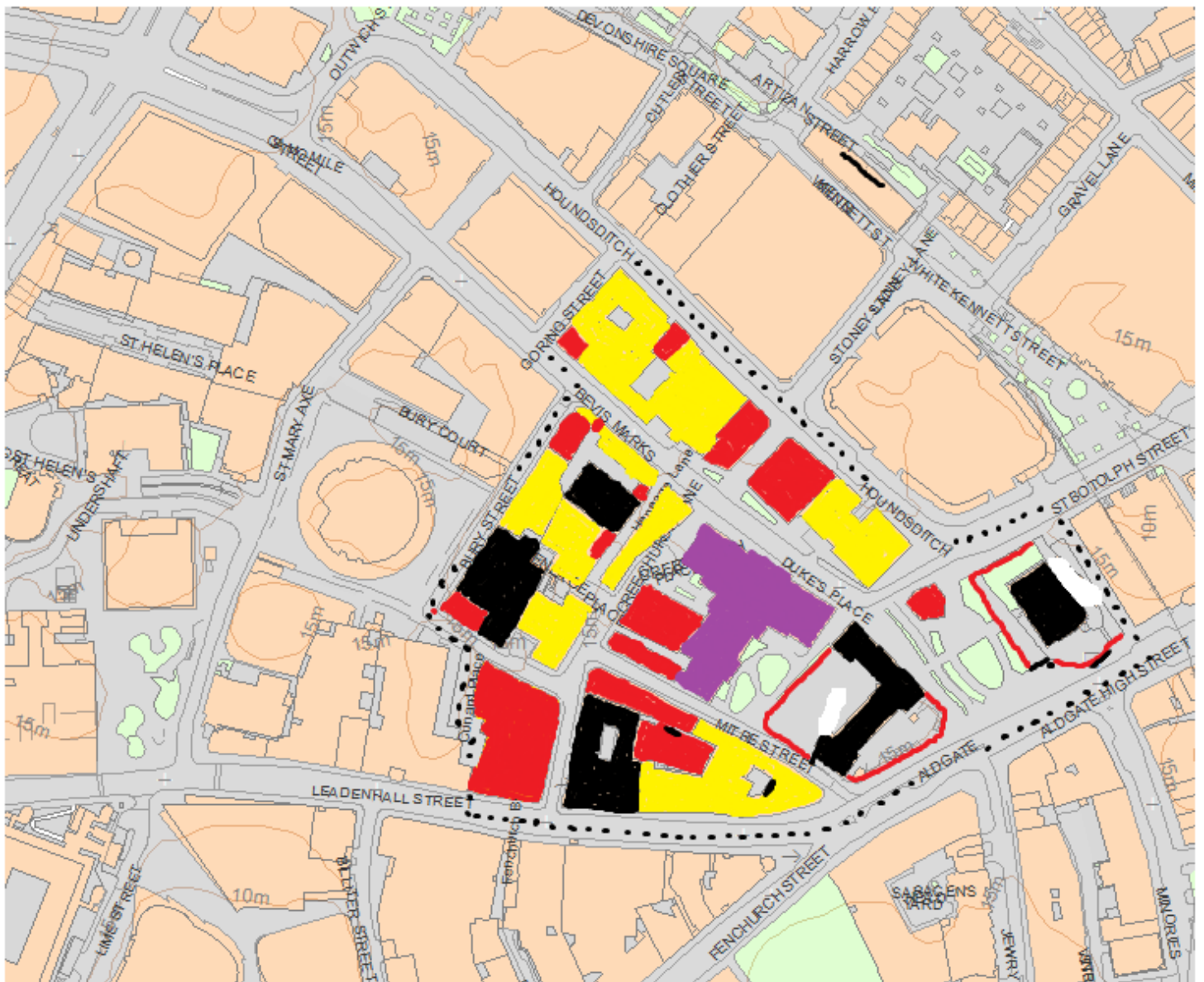
1. Proposed Conservation Area Boundaries
2. Heritage Assets
3. Scheduled Ancient Monument
4. Townscape views
5. Public Realm

MAP 1 PROPOSED BOUNDARIES

BEVIS MARKS / CREECHURCH CONSERVATION AREA



MAP 2 HERITAGE ASSETS



Designated heritage assets



Undesignated heritage assets



Recent buildings of appropriate scale

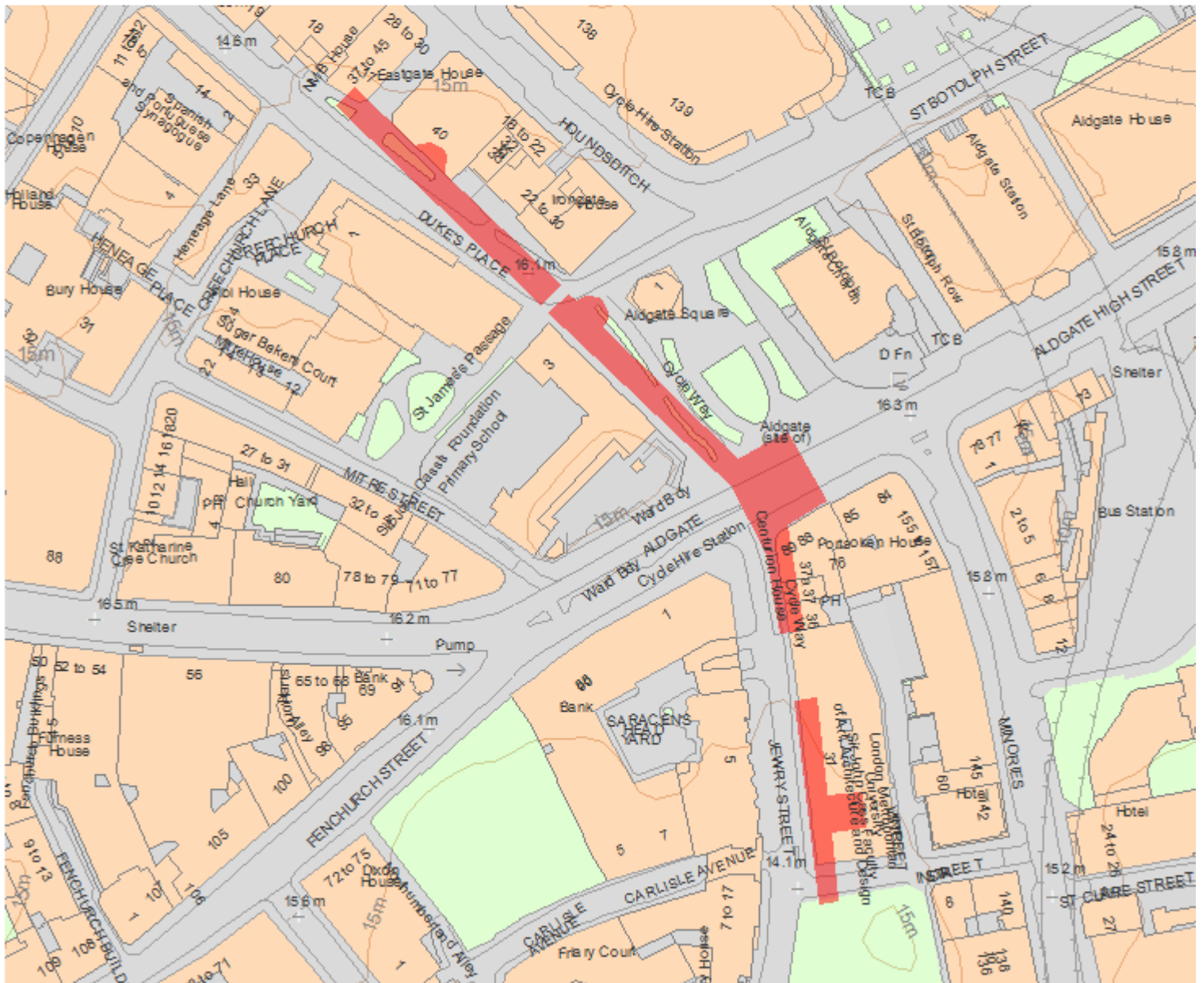


Buildings with negative impact

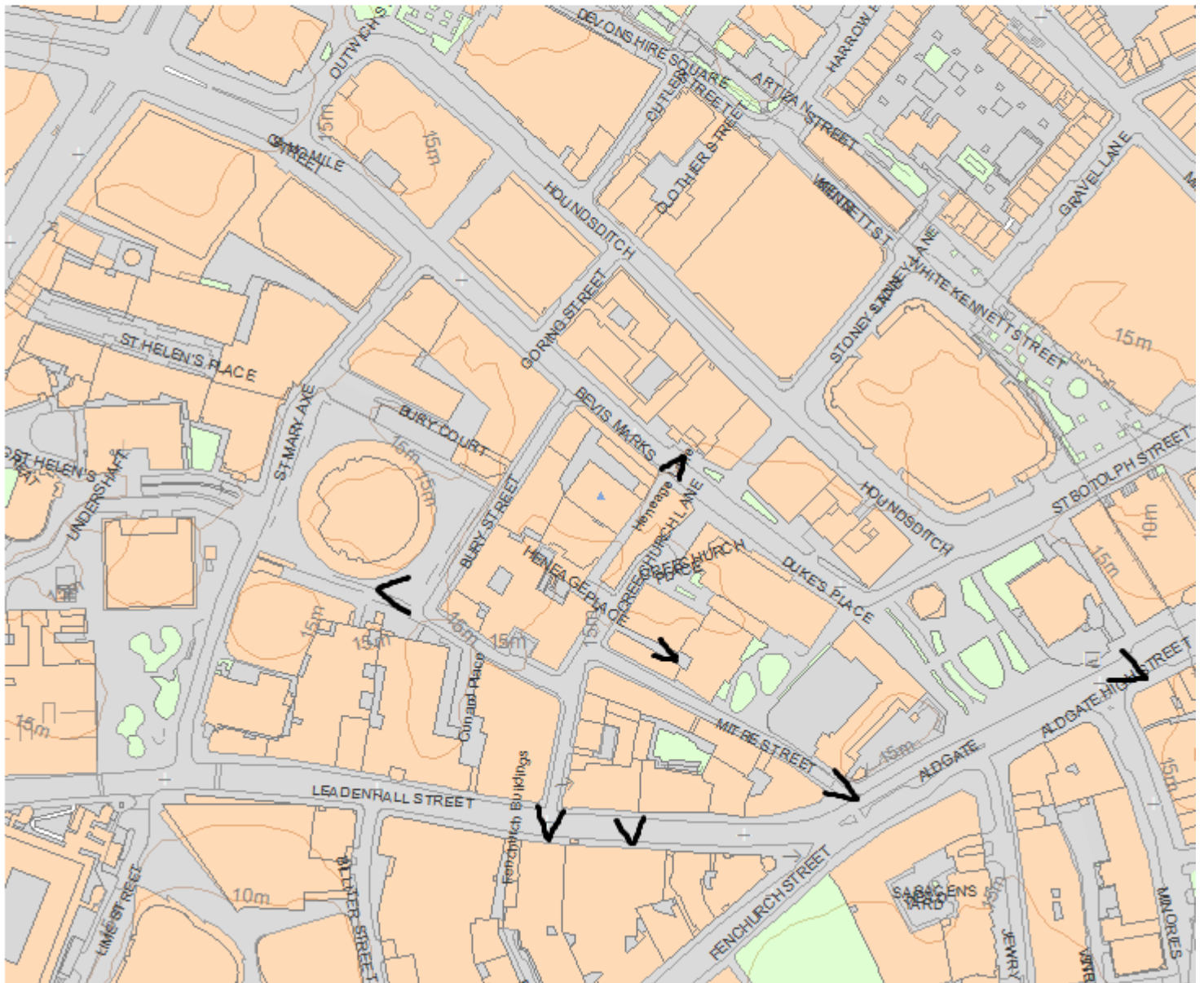


Proposed Conservation Area boundary

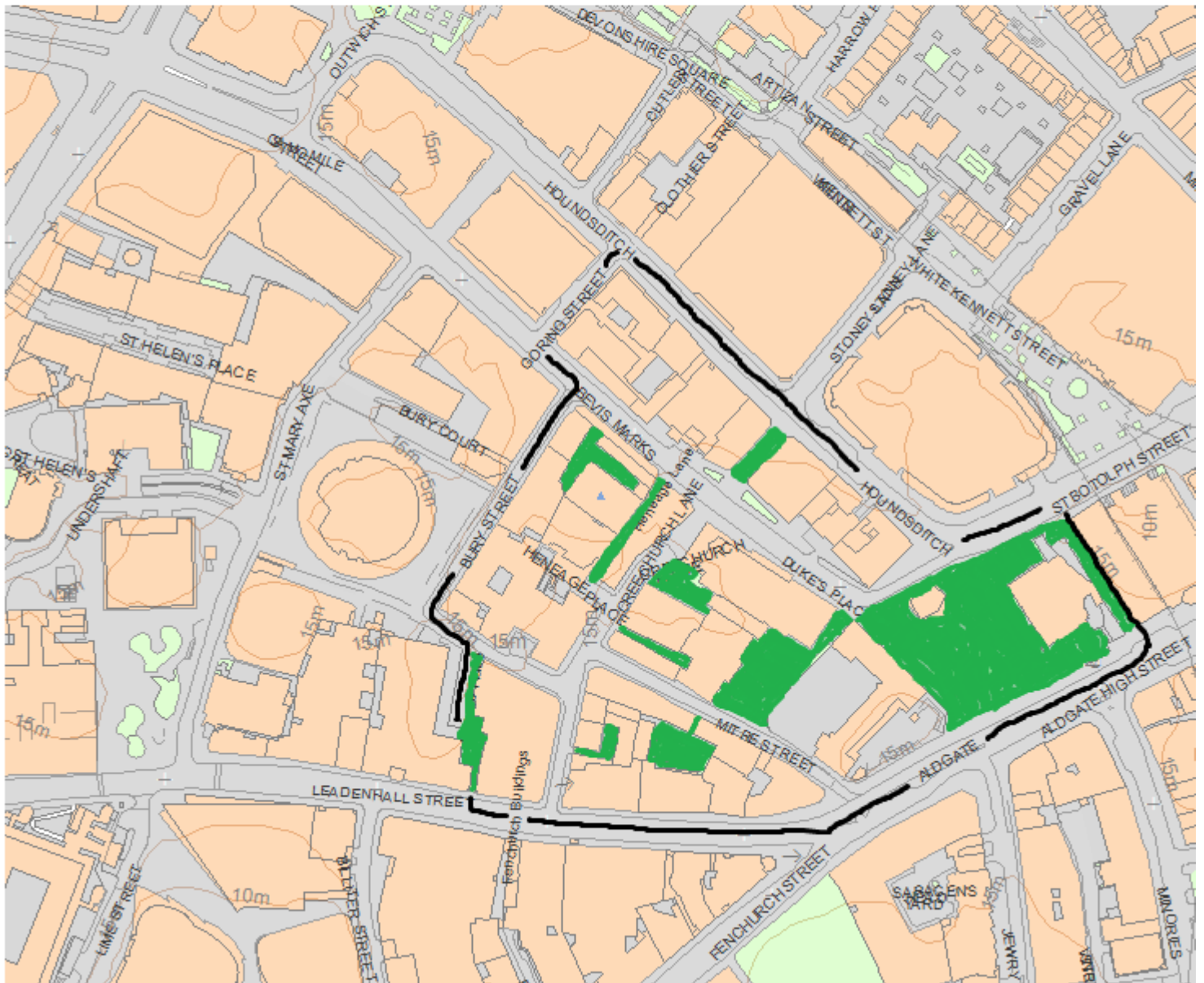
MAP 3 Scheduled Ancient Monument



MAP 4 VIEWS



MAP 5 PUBLIC AND SEMI-PUBLIC REALM



Mr T Nancollas and Mr B Eley
Environment Department
City of London
Guildhall
London
EC2V 7HH

By email: tom.nancollas@cityoflondon.gov.uk and ben.eley@cityoflondon.gov.uk

Dear Tom and Ben,

Proposed Creechurch Conservation Area

Thank you for explaining your work in progress on Friday.

We are of course very supportive in principle of the proposed Conservation Area, which we see as providing a valuable layer of heritage protection to a part of the City which is undoubtedly deserving of it.

Your proposed boundary is more tightly drawn than the one we proposed, which we think is regrettable in general, but about which we will leave others to comment. However, it specifically excludes 31 Bury Street, which we regard as indefensible, and about which you can expect the community associated with the synagogue to have very strong views.

Situation of 31 Bury Street

The building at 31 Bury Street, Bury House, is a relatively modern building that is architecturally undistinguished, but which sits comfortably on its site, respectful in its height, massing and architecture of its very close proximity to the Grade 1 Listed synagogue and its adjacency to the Grade 2* Listed Holland House. It is directly south of the synagogue, including direct views onto the synagogue's eastern facade and windows, and thus any additional height would immediately start to overshadow the synagogue and its courtyard. Furthermore, it abuts the synagogue freehold, currently occupied by Valiant House.



Background

I am sure you will recall what happened in October 2021. Planning permission was refused by the Planning & Transportation Committee for a 49 storey office building (ref. 20/00848/FULEIA). The first reason for refusal was *"The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities..."*; the second reason was *"The development would adversely affect the setting of the Tower of London World Heritage Site..."*.

BOTH reasons for refusal were about heritage impact. Clearly, therefore, 31 Bury Street occupies a very sensitive position in heritage terms.

It is public knowledge that the owners of 31 Bury Street are preparing to submit a further planning application. It appears as though this will be for a 43 storey scheme. The difference in impact between this scheme and the refused scheme will be barely discernible.

Change since 2021

Planning policy has not changed formally since October 2021. However, the planning system has not stood still.

In November 2021, the Secretary of State dismissed the Tulip development, which would have occupied a site close to the synagogue, a similar distance from it as 31 Bury Street is. The inspector concluded that the Tulip would, as far as the synagogue is concerned, *"create an overbearing presence from within the curtilage of the heritage asset"*¹

Furthermore, the Corporation has been implementing its Climate Action Strategy (of which it is justifiably proud), and the 2022 progress report emphasises the major contribution to carbon emissions made by commercial buildings and the fact that the City is lagging behind its target for improvement. This has focussed attention even more sharply upon the desirability of avoiding the release of embedded carbon by the demolition of buildings such as 31 Bury Street.

The case for including 31 Bury Street in the proposed Conservation Area

There is a compelling case for including 31 Bury Street, for a number of reasons:

1. 31 Bury Street is very close to the synagogue: it is just a few metres from the building and its courtyard. It is immediately adjacent to Holland House. It is on any objective analysis within the setting of Holland House, and any proposal to increase its height would automatically intrude into the setting of the synagogue, and directly reduce light to several of its windows, including its sensitive eastern and southern facade.

¹ Para 8.61

2. The area is of very high heritage sensitivity, as demonstrated by the 31 Bury Street and Tulip decisions, let alone the existence of Listed buildings of exceptional importance. The precautionary principle should clearly apply. Conservation Area designation does not prevent redevelopment, but it does serve to focus the attention of planning decision-makers on the existence of heritage assets and potential threats to their significance. If the City is serious about taking heritage and cultural considerations seriously, it should start by including 31 Bury Street in the Conservation Area and put the onus on the prospective developers to demonstrate why their proposed building should be found to be acceptable.
3. 31 Bury Street would probably best be regarded as a neutral contributor to the Conservation Area. It is normal practice for neutral and indeed negative contributors to be included in Conservation Areas as long as it is logical to include them in terms of creating a coherent Conservation Area. Indeed, Planning Practice Guidance² says, "*A good appraisal will consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection*". Likewise, the NPPF³ says that "*Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance*". You are intending that 33 Creechurch should be included within the Conservation Area; it too is a neutral or negative contributor, so the same approach should be applied to 31 Bury Street.⁴ Other Conservation Areas within the City clearly contain neutral/negative contributors.
4. Conservation Areas are areas of special architectural OR historic interest whose character OR appearance it is desirable to preserve OR enhance⁵. It is important not to ascribe undue importance to architectural merit.
5. The threat of inappropriate redevelopment is a legitimate factor to be taken into account in deciding on the boundary of a Conservation Area. Historic England advice⁶ is that, "*Before finalising the boundary it is worth considering whether the immediate setting also requires the additional controls afforded by designation, or whether the setting itself is sufficiently protected by national policies or policies in the Local Plan*". In the present case, the inclusion of the area within the tall buildings cluster, and the City's definition of a tall building being one over 75 metres high, clearly means that Local Plan policies themselves are not strong enough.
6. If 31 Bury Street is not included in the Conservation Area, its exclusion is almost bound to be seized upon by the site owners as an implicit "green light" to

² 025 Reference ID: 18a-025-20190723

³ Para 207

⁴ One Creechurch Place is in a different category; it is a very tall and dominant building which is strongly negative in its heritage impact

⁵ Planning (Listed Buildings and Conservation Areas) Act 1990; s.69.1(a)

⁶ Paragraph 75; Historic England Advice Note 1 (second edition) "Conservation Area Designation, Appraisal and Management". Paragraph 91 acknowledges that neutral or negative features can be expected in most Conservation Areas.

redevelopment with a tower. They will argue that the City has considered the Conservation Area boundary carefully and concluded that 31 Bury Street should not be constrained by heritage considerations. Frankly, it might be better not to have a Conservation Area at all than to hand them the opportunity to make such a point.

Our request

There is yet time to amend the proposed Conservation Area boundary line before the meeting of the Planning & Transportation Committee on 18 July, and before the misguided draft line is put in the public domain. I urge you to take this opportunity and thus avoid provoking a repeat of the sort of widespread outrage that was unleashed by the previous planning application at 31 Bury Street.

I shall of course be very happy to continue to discuss this matter with you at any time.

Yours sincerely,

Shalom Morris
Rabbi, Bevis Marks Synagogue