

Appendix 4

This Appendix includes the consultation responses (redacted) received via email and as hard copied. The consultation responses received via Commonplace can be viewed here:

<https://creechurchconservationarea.commonplace.is/en-GB/contributions/proposal/surveyquestions>

TJH/EO/DP6571

06 November 2023

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Dear Sir / Madam,

CREECHURCH CONSERVATION AREA – REPRESENTATIONS ON BEHALF OF BEVIS INVESTMENT HOLDINGS LTD

Context

On behalf of our client, Bevis Investment Holdings Ltd, we are pleased to submit representations in respect of the Creechurch Conservation Area Consultation. Bevis Investment Holdings Ltd has an ownership interest in 10-16 Bevis Marks, an existing five storey office building located between Heneage Lane to the east and Bury Street to the west ('the Building'). The Building is located just inside the northern boundary of the proposed Creechurch conservation area.

The existing offices within the Building have been vacant for over 18 months. Bevis Investment Holdings Ltd have subsequently recently been engaged in pre-application discussions with the City of London and other local stakeholders regarding proposals to repurpose the building to create serviced apartments across the upper floors with active and multifunctional uses located at ground floor level. The proposals also include replacement of the existing plant level with a new level containing serviced apartments, as well as a number of enhancements to the existing facades, including a reinstatement of the original entrance to the Bevis Marks Synagogue which is located through an existing passageway to the south of the Building.

Proposed Creechurch Conservation Area

Within the Creechurch Conservation Area Proposal Document (July 2023), the Building is identified as *"...an important frontispiece building to the Synagogue and its courtyard, and is of sympathetic scale, form and materiality"*.



Bevis Investment Holdings Ltd recognise that due to the Building's location in proximity to the Bevis Marks Synagogue that it has a relationship with the Grade I listed Synagogue. However the existing Building is not considered to be of high architectural quality, and currently has a tired and worn appearance, both on its main elevation fronting Bevis Marks and its rear elevation facing the Synagogue and its associated courtyard. At best, the Building could only be described as making a neutral contribution to the proposed Conservation Area once it comes into place.

On this basis, it is requested that specific reference is made within the Character Summary and Management Strategy document once adopted that the Building only makes a neutral contribution to the character and appearance of the area. The proposals that are currently being developed will improve the overall architectural quality of the Building, delivering an overall improvement to the quality of the townscape and its appearance within the Conservation Area, as well as the setting of the Bevis Marks Synagogue.

We look forward to receiving acknowledgement of these representations. Should you require any further information please contact Tim Holtham or Esme O'Meara of this office.

Yours faithfully

DP9 Ltd

DP9 Ltd.

The Proposed Designation of the Creechurch Conservation Area Consultation Representations on Behalf of Bahagia Investments Limited

3rd November 2023

1.0 Introduction

1.1 These Representations are prepared by The Townscape Consultancy Ltd. on behalf of Bahagia Investments Limited, the freehold owners of Cunard House, 88 Leadenhall Street. These Representations have been made in response to the consultation on the proposed designation of the Creechurch Conservation Area. The Local Planning Authority (LPA) in this case is the City of London Corporation (hereby referred to as 'CoLC'). CoLC is currently consulting on boundary options for the Creechurch Conservation Area; Options 1, 2 and 3 or potentially Option 4, being a further boundary that consultees may propose. While Options 1 and 2 would exclude it, Cunard House would be included within the proposed boundary of Option 3. Below we provide our answers to the questions set out by the CoLC as part of the consultation process.

Answers to the consultation

1) *Do you agree that the Creechurch area should be designated as a conservation area?*

- Yes

2) *Which is your preferred option? If you don't like any of them you can offer an Option 4.*

- Option 1

3) *If you choose Option 4, please describe your preferred boundary.*

- N/A

4) *Why do you think your selected area is of special architectural or historic interest?*

- See Section 3

5) *Please share any additional general information and facts about the area to support your choice.*

- This note sets out further information.

6) Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? [Explanation of the Equality Act - Section 149 \(external link\)](#)

- It is expected that people with protected characteristics that live, work, and/or worship in the area should not be affected differently than other people by the boundary selected for the conservation area. When individual development proposals come forward within or nearby the future conservation area, the CoLC will consider its duty under the Equality Act 2010

7) Please explain your answer to Question 6.

- See answer to Question 6.

8) Is there anything that could be done to mitigate any impacts identified?

- N/A

1.2 In principle, we are supportive of the overarching objectives of CoLC to formally designate a new conservation area in the Creechurch locality, based on the findings of the Creechurch Conservation Area Proposal prepared by CoLC in July 2023 in respect of Option 1, which provides an overarching summary of the area's special interest:

(i) Strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory, visible in the modern street pattern;

(ii) A characterful group of late C19/early C20 warehouses on Creechurch Lane/Mitre Street that are fine examples of their kind and survivors of a type now rare in the City;

(iii) Three places of worship of (in a City context) unusually diverse origins and of outstanding architectural and historic interest: Bevis Marks Synagogue (first purpose-built since resettlement and now oldest in UK), St Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church);

(iv) A proliferation of historic open spaces of diverse scales, functionality and appearance; and

(v) Strong and continuing associations with the Jewish community following resettlement in the C17.

1.3 For the purposes of these Representations we have not sought to provide commentary on the relative merit of the individual buildings proposed to be covered by the conservation area designation, except for the existing building at 88 Leadenhall Street (Cunard House) which falls within the ownership of Bahagia Investments Ltd. Cunard House has been identified as a positive contributor in the alternative



report supporting Option 3, produced by consultants on behalf of the Bevis Mark Synagogue, as opposed to the report produced by the CoLC's officers.

- 1.4 We have carefully considered the potential boundary options presented as part of the consultation. Our conclusion is firmly in line with the proposal prepared by the CoLC, supporting Option 1. The methodology and assessment conducted by CoLC officers aligns with due process and the conclusion is robust. The purpose of any thorough consultation is of course to consider all views to ensure that the best end result is obtained, but in this scenario we do not consider that Option 3 can be justified based on legitimate conservation requirements. Further detail is included within these Representations to explain our rationale behind this position.



2.0 Legislation, policy, and guidance on conservation areas

The LPA's statutory duty in respect of conservation area designation

- 2.1 As defined in Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the '1990 Act'), a conservation area is an area which has been designated by an LPA because of its '*special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.*'
- 2.2 In discharging its powers under Section 69 of the 1990 Act, the LPA is bound to exercise its discretion reasonably, and to have due regard to the legislation, relevant policy, and guidance.
- 2.3 The quality and interest of the whole area should be the primary consideration in identifying conservation areas. The object, therefore, should not be to protect individual buildings or spaces which are not of demonstrable interest, nor if they do not contribute to the particular character of the conservation area.

National policy and guidance on conservation areas

- 2.4 The National Planning Policy Framework (2023) sets out at paragraph 191 that:

When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest (our emphasis).

- 2.5 The policy is supported by the National Planning Policy Guidance ('PPG'). The PPG includes a section on the 'Historic Environment' which was last updated in July 2019.

- 2.6 At paragraph 024, the PPG states that:

Local planning authorities need to ensure that the area has sufficient special architectural or historic interest to justify its designation as a conservation area. Undertaking a conservation area appraisal may help a local planning authority to make this judgment.

Supplementary guidance prepared by Historic England

- 2.7 Historic England provides supplementary guidance on the purpose and methods of designating and assessing historic areas in its Advice Note on *Understanding Place: Historic Area Assessments* (April 2017). The guidance note sets out how Historic Area Assessments (HAAs) should be undertaken to



understand and explain the heritage interest of an area. The note sets out that methods of HAA closely align with methods of Conservation Area Appraisal.

- 2.8 Under the 'Key Issues' to be considered the guidance states that *'appropriate boundaries'* should be established to keep Historic Area Assessments *'focused and manageable'* and that the relevance of such boundaries should be examined critically.
- 2.9 Historic England has prepared separate guidance in relation to conservation areas in *Advice Note 1: Conservation Area Designation, Appraisal and Management* (2nd Edition, February 2019).
- 2.10 At paragraph 11 the Advice Note sets out that the purpose of appraising an area for designation is to consider:

a) whether there is sufficient architectural or historic interest for the area to be considered 'special'?;

b) whether this is experienced through its character or appearance?; and

c) whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help to solve.

Suitability for Designation

- 2.11 At paragraph 72, Advice Note 1 provides examples of the different types of special architectural and historic interest which could justify conservation area designation, including:

- *areas with a high number of nationally or locally designated heritage assets and a variety of architectural styles and historic associations;*
- *those linked to a particular individual, industry, custom or pastime with a particular local interest;*
- *where an earlier, historically significant, layout is visible in the modern street pattern;*
- *where a particular style of architecture or traditional building materials predominate; and*
- *areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest.*

Assessment of Special Interest

- 2.12 At paragraph 34 the guidance in Advice Note 1 sets out a number of key elements that may assist in defining the special interest of an area, including *'the still-visible effects/impact of the area's historic development on its plan form, townscape, character and architectural style and social/ historic associations and the importance of that history'*.
- 2.13 The guidance goes on to state at paragraph 43 that conservation area appraisals *'should focus on setting out what makes the area special and the impact of its history on its current character and appearance.'*

Positive contributors to conservation areas

- 2.14 There is a presumption against demolition of buildings identified as 'making a positive contribution' to the Conservation Area. Positive contributors are referred to at page 20 of Historic England's Advice Note 1, which states:

[...] Whilst designated status (ie nationally listed) or previous identification as non-designated heritage assets (such as through local listing) will provide an indication of buildings that are recognised as contributing to the area's architectural and possibly historic interest, it will be important also to identify those unlisted buildings that make an important contribution to the character of the conservation area.

- 2.15 The guidance goes onto suggest a number of questions to assess the value of an unlisted building to the importance (significance) of a conservation area.

Summary of policy and guidance on conservation areas

- 2.16 The purpose of designating or extending conservation areas is to preserve or enhance areas of *'special architectural or historic interest'*. Therefore, the designation or extension of a conservation area which is motivated principally by a desire to protect specific buildings would not ordinarily meet the statutory test.
- 2.17 The guidance in the NPPF and PPG emphasises the importance of ensuring that an area justifies its status as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. This is supported in the guidance produced by Historic England, in particular within Advice Note 1.
- 2.18 We consider therefore that there must be some physical evidence, experienced visually and experientially through the character and appearance of the area's buildings and spaces, to give rise to an area's special architectural or historic interest. It follows that the historic interest of a specific site or group of buildings is not sufficient if they do not contribute to the character and appearance of an

area which is worth preserving and enhancing. Conservation areas therefore should not be designated with the purpose of creating a buffer for listed buildings (which already have statutory protection through the consideration of their setting and its contribution to heritage significance), nor to prevent redevelopment of buildings, as this runs contrary to legislation, policy, and guidance.



3.0 Summary and significance of the Draft Creechurch Conservation Area

- 3.1 We have reviewed the Creechurch Conservation Area Proposal prepared by CoLC in July 2023, and the Proposed Bevis Marks/Creechurch Conservation Area document prepared by consultants for the Bevis Marks Synagogue (May 2022). The CoLC's Creechurch Conservation Area Proposal notes at 'Section 3.3 – Eligibility for Conservation Area Status' that:

'[...] the Creechurch locality is found to be richly historic, with a multi-layered sense of place stemming from the ancient delineation of the Roman and medieval City wall and Aldgate and the layout of the Holy Trinity Priory, foremost amongst the medieval City's monastic foundations, both of which have perceptibly influenced the modern street plan. Although upstanding remains of these structures are not now visible in the townscape (with the exception of the Grade II listed archway to the rear of nos. 39 and 40 Mitre Street), the archaeological potential, placenames, forms and spaces (e.g. Aldgate, Mitre Street and Square, Creechurch Place, St Katherine Cree churchyard) they bequeathed convey a strong sense of special historic interest.

Above ground, there is significant architectural interest in the streets and buildings subsequently developed from the early modern period onwards: the two City churches and Bevis Marks Synagogue offer outstanding examples of their types; Holland House strikes a pleasingly eclectic note; the Creechurch/Mitre Street warehouses are a rare and fine group of their kind. The locality is found to possess a varied, characterful and interesting group of historic buildings studded with highly significant historic places of worship and interspersed with more neutral modern buildings that help to create a consistent sense of townscape and distinctive sense of place.'

- 3.2 We consider that the significance of the listed buildings, individually and as a group, is considerable and along with the 19th century warehouse buildings and the historic remains of the Holy Trinity Priory at 77 Leadenhall Street, they should form the core of the new Creechurch Conservation Area. As such we agree that the area has sufficient architectural or historic interest to be considered 'special' and thus would warrant designation as a conservation area.

4.0 Proposed boundaries for consultation

- 4.1 In this section we set out our review of the proposed boundary options for the Creechurch Conservation Area in line with Historic England’s guidance and the statutory requirement at section 69 of the 1990 Act.
- 4.2 CoLC is currently consulting on boundary options for the Creechurch Conservation Area. The boundary options are as follows:
- Option 1: CoLC’s officers’ preferred option, based on expert evidence and subject to an appraisal, dated July 2023;
 - Option 2: Alternative option by CoLC proposed as a result of members’ input into the suggested conservation area consultation. The proposed boundaries are the same as Option 1, with the addition of 31 Bury Street;
 - Option 3: Alternative option proposed by Bevis Marks Synagogue. This option includes the same area as Option 2 with the addition of the buildings to the north of Bevis Marks/Duke’s Place, 1 Creechurch Lane, and Cunard House at 88 Leadenhall Street; and
 - Option 4: Any further alternative boundary as may be proposed by consultees.
- 4.3 For the purposes of these Representations, we have not sought to provide separate commentary on the relative merit of proposed boundary Options 1 and 2 as neither option proposes to include Cunard House within the boundary. We have provided separate commentary on the extended boundary proposed by the Bevis Marks Synagogue in Option 3.

Commentary on Options 1 and 2

- 4.4 Option 1 comprises CoLC’s preferred option and is accompanied by the CoLC’s Creechurch Conservation Area Proposal of July 2023. There are a number of listed buildings that are proposed to fall within the boundary, including;
- The Bevis Marks Synagogue (Grade I);
 - The Church of St Botolph (Grade I) and associated iron gateway to the church yard (Grade II);
 - The Church of St Katherine Cree (Grade I) and associated gateway in church yard (Grade II);
 - Holland House (Grade II*);
 - Sir John Cass School (Grade II*);
 - Archway between numbers 39 and 40 Mitre Street and at rear of numbers 72 and 73 Leadenhall Street (Grade II); and
 - 2-6 Creechurch Lane (Grade II).

- 4.5 The suggested boundary excludes a number of streets and individual buildings that are considered to depart from the qualities of the conservation area, including:
- Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate;
 - Bury House, 31 Bury Street;
 - One Creechurch Place, 26 Creechurch Lane and 1 Mitre Square; and
 - Cunard House, 88 Leadenhall Street.
- 4.6 Option 2 presents the same boundary as Option 1, with the inclusion of the building at 31 Bury Street.
- 4.7 With regards to Cunard House, the Creechurch Conservation Area Proposal appraisal accompanying Option 1 notes at section 3.2 (p. 25) that the building *'[...] is a modern building (completed c.2000) of no inherent architectural or historic interest, although one of its predecessors on the site was the first Synagogue, converted from a house, following the resettlement. Although of broadly sympathetic scale and materiality to the other buildings in the locality, it is notably higher and relates more in orientation and 'feel' to bigger buildings along Leadenhall Street than the smaller-scale, more granular character of the Creechurch locality. As such it is not considered to meet the criteria for inclusion in a conservation area.'*
- 4.8 We agree with CoLC's assessment that there are no evident reasons for the inclusion of Cunard House within the conservation area boundary, as it does not meet the criteria for inclusion and would run contrary to paragraph 191 of the NPPF (2023), with CoLC failing in its duty to *'[...] ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'*

Commentary on Option 3

- 4.9 Option 3 is the boundary option proposed by Bevis Marks Synagogue. This option includes the same area as Option 2, with the addition of the buildings to the north of Bevis Marks/Duke's Place, 1 Creechurch Lane, and Cunard House at 88 Leadenhall Street.
- 4.10 We note that the alternative appraisal prepared on behalf of the Bevis Marks Synagogue identifies the existing building at Cunard House as a positive contributor. The appraisal refers to Cunard House as:

[...] 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.

4.11 We note that the description of the height of the building is inaccurate, as it is an equivalent of nine storeys in total of which the level 8 is slightly recessed and level 9 is further recessed and contains plant. Also, the building does not reduce in scale to the north but maintains the same height throughout.

4.12 The Historic England document, *Historic England Advice Note 1 (Second Edition) - Conservation Area Appraisal, Designation, and Management* (2019) suggests a number of questions to assess the value of an unlisted building to the significance of a conservation area in Table 1. Each question is addressed in turn below.

1) Is it the work of a particular architect or designer of regional or local note?

- The building was designed by Fitzroy Robinson & Partners. The practice is known to have designed several commercial buildings and public buildings in central London, including Sampson House, 102 Petty France 1976-9, the Sedgwick Centre (now the White Chapel Building) 1986-8, and Brown Shipley, Moorgate, 1973-5 (Grade II). It is considered that the practice was, to a limited degree, of some local note, however the building at Cunard House is a later example of their work and is not considered of the same architectural design quality as their best work.

2) Does it have landmark quality?

- No – the building replaces a previous large scale commercial building on the site which occupies a corner plot at Leadenhall Street and Creechurch Lane. Historic mapping suggests that historically the site was occupied by buildings of a much finer grain and thus its larger plot form does not exhibit landmark qualities.

3) Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?

- No – the existing building on site is not a historic building that would inform the character and appearance of the proposed conservation area, which is primarily made up of 19th century warehouses, early 20th century commercial buildings, and notable religious buildings. It is a typical commercial office building of the 1990s.

4) Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?

- No – the building shares no functional relationship with the previous Art-Deco building on the site and does not relate to the adjacent designated heritage assets which are of a finer grain and lower scale.



- 5) Does it contribute positively to the setting of adjacent designated heritage assets?
- No – the building does not relate in scale nor share a relationship with the surrounding listed buildings, such as the Grade I listed Church of St Katherine Cree and the Grade II listed 2-16 Creechurch Lane immediately opposite.
- 6) Does it contribute to the quality of recognisable spaces including exteriors or open spaces within a complex of public buildings?
- No – it forms an unremarkable built edge at the corner of the historic routes of Leadenhall Street and Creechurch Lane.
- 7) Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?
- No – it is not associated with a designed landscape.
- 8) Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?
- No – the building does not mark any particular architectural period of interest in the wider historic development of the City of London.
- 9) Does it have significant historic associations with features such as the historic road layout, burgage plots, a town park, or a landscape feature?
- No – the existing building at 88 Leadenhall Street was built on a medieval plot layout that historically comprised finer grain buildings. Its architecture does not relate to the historic street pattern.
- 10) Does it have historic associations with local people or past events?
- No – the building replaces an earlier Art-Deco building but this in itself does not derive it any significance. It is a typical office building of the 1990s.
- 11) Does it reflect the traditional functional character or former uses in the area?
- No – it is a typical late 20th century commercial building in the City of London and is of no particular interest.
- 12) Does its use contribute to the character or appearance of the area?
- No – the building does not make any particular contribution to the character and appearance of the area, although its office use is consistent with the wider City of London.

- 4.13 Overall, we consider that there is no evidence to suggest that Cunard House *'makes a positive contribution to the area'* as set out within the alternative appraisal prepared on behalf of the Bevis Marks Synagogue, and in any event its inclusion within the conservation area boundary would be inappropriate as it does not meet the statutory test. The building comprises an unremarkable late 20th century commercial office building. The existing building reflects the materiality of the neighbouring buildings yet it is of a considerably larger scale which contrasts to that of the historic buildings along Creechurch Lane, including the Grade I listed Church of St Katherine Cree, immediately opposite. Although the building partially reflects the architectural character and detailing of the previous 1930s building on the site, this is on its southern façade fronting Leadenhall Street, away from the rest of the proposed conservation area, and it does not relate in age and scale to the buildings proposed to fall within the conservation area boundary.
- 4.14 The appraisal prepared on behalf of the Bevis Marks Synagogue refers to the historic City Corporation plaque marking the Site of the First Synagogue 1657 – 1701, which is affixed to the north-eastern corner of Cunard House. We contend that the presence of a commemorative plaque affixed to a relatively modern building would not be sufficient to demonstrate the level of special interest required to warrant the building's inclusion within a conservation area designation, nor its identification as a positive contributor to a conservation area. If this was the case, then the building at One Creechurch Place, which also incorporates a historic City Corporation plaque marking the site of the Great Synagogue on Duke's Place, would also need to be identified as a positive contributor in the accompanying appraisal. Instead, the alternative appraisal identifies One Creechurch Place as having a negative impact on the area.
- 4.15 The Proposed Bevis Marks/Creechurch Conservation Area document, prepared on behalf of the Bevis Marks Synagogue, states at paragraph 1.02 that:
- '[...] 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.'*
- 4.16 We contend that the above is factually inaccurate, as the larger conservation area boundary proposed by the Bevis Marks Synagogue includes a number of existing and consented taller modern developments including Cunard House and even taller buildings like One Creechurch Place and the consented 24 Bevis Marks. So, if Option 3 was selected, tall buildings would form a defining characteristic of the conservation area's character and appearance.
- 4.17 As a whole, it is considered that the inclusion of Cunard House within the conservation area boundary would be inappropriate considering the statutory criteria for conservation area designation. Its

inclusion appears to contradict the apparent low-rise scale of the Creechurch area referred to in the appraisal document.

- 4.18 It follows therefore that the Option 3 boundary is not in line with established designation criteria and proposes to include existing and consented built forms that would not contribute in a meaningful way to an appreciation and understanding of the proposed conservation area's special interest. The logic for including larger scale, or architecturally undistinguished buildings within the proposed boundary has not been explained within the accompanying appraisal document.

5.0 Conclusions

- 5.1 This report has been prepared on behalf of Bahagia Investments Ltd. in response to the consultation on the proposed designation of the Creechurch Conservation Area by the City of London.
- 5.2 Overall, we are supportive in principle of the proposed designation of the Creechurch Conservation Area in recognition of its special interest as identified in the assessment conducted by the CoLC's officers, and summarised at section 4.2 of the appraisal document (and referenced above at paragraph 1.2).
- 5.3 We reiterate that the proposed designation of any conservation area must be assessed against the statutory criteria. The quality and interest of the area as a whole, as opposed to individual buildings, should be the primary consideration in identifying conservation areas. The objective, therefore, should not be to protect individual buildings or spaces which are not of demonstrable interest, in line with Historic England's guidance (2019). On this basis, it is clear that Cunard House would not meet the criteria for inclusion within the Creechurch Conservation Area boundary.
- 5.4 We submit that the proposed boundary Option 3 put forward as an alternative by the Bevis Marks Synagogue would be inconsistent with the purpose of the legislation and would not substantiate a claim for '*special architectural or historic interest*' as required for designation under s69 of the 1990 Act. In addition, the identification of Cunard House as a positive contributor in the accompanying appraisal is unsubstantiated.
- 5.5 We consider that the inclusion of Cunard House simply to create a buffer for other buildings is not a valid argument for inclusion within the proposed Creechurch Conservation Area as it does not inform the character and appearance of the conservation area and cannot be justified based on legitimate conservation requirements. Further, we consider that its inclusion within the conservation area boundary could devalue the concept of conservation through the designation of an area that lacks special interest, as per paragraph 191 of the NPPF (2023).



Email: PlanningPolicyConsultations@cityoflondon.gov.uk

2 November 2023

Dear planning team,

RE: Creechurch Conservation Area

Thank you for consulting the Twentieth Century Society on the proposed new Creechurch Conservation Area in the City of London. The Society welcomes this proposed new designation and writes in support of Option 3 but encourages the City of London to extend these proposed boundaries slightly to include other nearby buildings of note. As the amenity society that specialises in sites built post-1914, our response here focuses on the 20th- and early 21st-century architecture in the area.

Of the three options presented, the Society's preference is for the third option which would include the following 20th-century sites

- Creechurch House, No.17 Bevis Marks, built in 1935 by Lewis Solomon
- No.31 Bury Street, built in 1967 by Gotch & Parters, which extends from the Grade II* Holland House of 1916 by Berlage and Van de Velde (which is also included in Option 2)
- Irongate House, No.30 Duke's Place, built in 1978 by Fitzroy Robinson
- Greenly House, No.40 Duke's Place, built in 1950 by Levin Solomon, son & Joseph
- Nos.40-41 Houndsditch, 1920s
- Nos.76 Leadenhall Street (1987 by Gollins Melvin Ward), No.78 Leadenhall Street (1991 by Ley, Colbeck & Partners) and No.80 Leadenhall Street (1990 by Hamilton Associates) (all of which are included in all three options)
- Cunard House, No.88 Leadenhall Street, built in 1999 by Fitzroy Robinson and incorporating elements of the former Mewes & Davis Art Deco building. Cunard House and Irongate House are very good examples of the late 20th-century architecture of Fitzroy Robinson who had an important role in shaping the architecture of the post-war City. Writing in *Building Design* in 1991, Kenneth Powell declared that "No firm has set its stamp so firmly on the City of London since 1960 than 'Fitzroys'" (p.18). Powell described the practice's work as embracing "stylistic pluralism" and "diversity", while being "streetwise" and contributing positively to the urban scene. These buildings showcase these characteristics.

The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

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These are a very good collection of inter- and post-war buildings which relate well to one another and create an interesting and varied streetscape.

The Society recommends the slight extension of Option 3's boundaries to the north- and south-east to include

- Aldgate Station which has a very fine 1925-6 elevation to its C19th trainshed, designed by Charles Walter Clark. Its white faience façade is very similar to Clark's other stations at Farringdon, Paddington and Willesden Green which are Grade II listed. Remarkably, Aldgate is not statutory listed but is clearly of architectural and historic interest as well as townscape value and would benefit from conservation area protection. Drawing the conservation area around Aldgate Station would help to provide a clear boundary in this north-east corner.
- Portsoken House (84-85 Aldgate High Street and 155-57 Minories) which was built in 1927-8 by George Val Myer, the architect of the BBC's Grade II* Broadcasting House (1932) on Portland Place. It was built back from the street to allow the road to be widened at this point which was a notorious traffic bottleneck. It is a landmark building at a prominent location where Minories meets Aldgate High Street, and its curved elevation responds to its corner plot. Portsoken House was reportedly the tallest office in the City of London when completed in the 1920s and it is stone-faced and richly ornamented.
- No.1 Minories, a 5-storey interwar Neo-Georgian building of red brick with stone dressings. It faces Portsoken House and mirrors its curved elevation. Together, the two buildings provide a gateway to the Minories from Aldgate High Street. No.1 is well-detailed, with decorative window surrounds and mouldings.
- The Grade II listed 19th-century 31 Jewry Street ('Sir John Cass College') and its interwar extension by Vener Rees. This Grade II listed building would nicely book-end the conservation area here.

The extension of the boundary here has also been requested by SAVE Britain's Heritage in their report published on 1 November 2023. These are high-quality buildings which have clear townscape value.

We also call for its extension to the north west to include 30 St Mary Axe ('the Gherkin') and its public plaza. Built in 2001-4 for Swiss Re by the renowned architectural practice of Foster and Partners, the iconic 41-storey 'Gherkin' is a technically- and environmentally-ambitious building which was extensively and highly reviewed upon its completion and was the worthy recipient of the prestigious Stirling Prize in 2004. It replaced the Baltic Exchange, which was damaged beyond repair by the IRA bomb in 1992 and its replacement with the new development was somewhat controversial at the time, but the Gherkin itself as a new work of architecture was well received and it has become one of London's best-known landmarks and a much-admired building on its skyline. It is known and admired not only in a national context but also internationally. The history of the Gherkin's construction and reception is well chronicled by Kenneth Powell in *30 St Mary Axe: A Tower For London* (2006). 30 St Mary Axe makes an important contribution to the City of London's

townscape and there are good, clear views of the skyscraper from within the proposed Creechurch Conservation Area, for instance looking north-west up Mitre Street. 30 St Mary Axe is a strong contender for future listing but in the meantime the City should identify and protect its heritage significance through its inclusion within the proposed Creechurch Conservation Area.

I attach with our letter a map of our proposed boundaries for the new Creechurch Conservation Area.

The Society's proposed extension has been supported by Kenneth Powell, a leading architectural historian and critic. Powell has written much about the late 20th- and early 20th-century built landscape of the City and is an expert on Norman Foster and author of *30 St Mary Axe: A Tower For London* (2006). Powell writes

"I write with reference to the current consultation regarding the proposed designation of a Creechurch Conservation Area. I strongly endorse the City's move to give added protection to this historic quarter. The C20 Society has asked me to support its recommendation that Option 3, as detailed in the consultation, be adopted. I am entirely supportive of this recommendation. The boundaries of the area proposed by Option 3 embrace a number of significant C20th buildings.

The Society has further recommended that the proposed conservation area be slightly extended to include 30 St Mary Axe, known as "the Gherkin". This building, designed by Foster + Partners, formed the subject of my 2006 book, *30 St Mary Axe: A Tower for London*.

30 St Mary Axe has been internationally acclaimed as a major work by this renowned practice. Environmentally progressive, it is a popular London landmark – indeed, it is one of very few tall office buildings of recent date in London that must in due course be considered for statutory listing.

30 St Mary Axe should certainly, for the interim, be included in the proposed conservation area. Consideration should be given to protecting its setting, in particular the clear views of the building that currently exist. It is a major element in the modern heritage of London.

Kenneth Powell" (1/11/2023).

We hope that these comments are of use to you. Please do not hesitate to get in touch if you have any questions.

Yours sincerely



The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ –



www.c20society.org.uk



Coco Whittaker

Senior Caseworker
The Twentieth Century Society
70 Cowcross Street



Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ – 


www.c20society.org.uk

Koukouthaki, Katerina

From: Rabbi Shalom Morris [REDACTED] >
Sent: 06 November 2023 16:44
To: McNicol, Rob; Nancollas, Tom; Koukouthaki, Katerina
Subject: Re: Conservation Area Consultation Response
Attachments: Faith_Letter.jpeg

THIS IS AN EXTERNAL EMAIL

Hi,

I'm separately submitting this letter which supports Option 3. It was circulated by the area's three faith leaders, including me. I hope it reflects the extent to which the local faith community shares the same view, which should be particularly significant in light of the fact that the proposed CA is meant to preserve the history of faith in the area.

Thank you for taking this into consideration.

Best,

Rabbi Morris

From: Rabbi Shalom Morris
Sent: Monday, November 6, 2023 4:33 PM
To: McNicol, Rob [REDACTED]; Nancollas, Tom [REDACTED];
Koukouthaki, Katerina [REDACTED] >
Subject: Conservation Area Consultation Response

Dear Rob, Tom and Kat,

Please find attached my personal submission. The 'Synagogue' has submitted separately. I hope you've found this to be an enriching and enlightening process, and that you will reach a recommendation that the synagogue, and 95% of respondents, support. I think you all realize that this is an opportunity to create something significant and lasting for future generations, and to support community cohesion, which is hugely important during trying times.

I look forward to hopefully taking it forward together with you. Thank you for the open-minded consultation.

Best,

Rabbi Morris

ST KATHARINE
CREE CHURCH

the
S&PHARDI
community Bevis Marks



Dear friend,

October 2023

CREECHURCH CONSERVATION AREA CONSULTATION

The City of London is currently consulting on a Conservation Area:
(<https://creechurchconservationarea.commonplace.is/en-GB/proposals/surveyquestions/step1>)
that acknowledges the importance of the area around Creechurch Lane in terms of its history and its architecture. This plan will help to protect what makes this area so special.



At the heart of the area is the site of Aldgate Priory (Creechurch), which until the 16th century was one of the largest complexes of buildings in the medieval City of London.

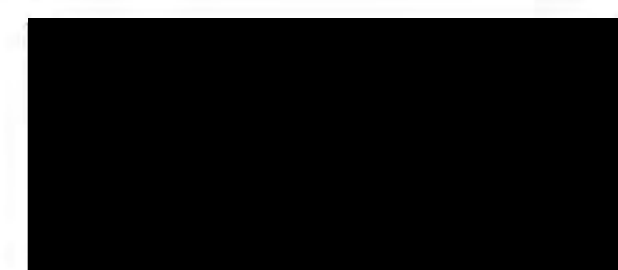
There are three alternative options for the Conservation Area. All three acknowledge that the significance of the area is wider than just the site of the former priory. Each also includes areas such as Aldgate Square and St Botolph's Church, as these are linked historically to the priory and also are important to the understanding and the context of the area.

The first two options however exclude the area around Bevis Marks Synagogue, the oldest Synagogue in the United Kingdom, and the oldest in Europe to have been in continuous use, along with parts of the former priory site, significantly impacting on the cohesion of the proposed Conservation Area and the protections that it seeks to bring to what makes the character of our area so special as a community

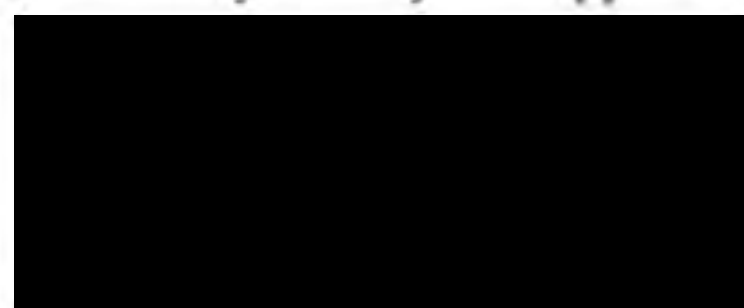
Within the proposed area there are three Grade I listed Places of Worship and together we wish to recommend to you that **Option 3** is the option that makes most sense in protecting the heritage and respecting the history and context of the area. This option would protect the whole of the site of the priory, the Synagogue, as well as slightly extending the area to acknowledge its context in relation to the adjacent old London Wall.

This option acknowledges the Jewish history of the area by including the historic sites of the Great Synagogue and the Creechurch Synagogue. The importance of these sites is already established by heritage plaques. Additionally, this option includes No 31 Bury Street where there is an application to build a 43-storey tower which would negatively impact on the proposed area and particularly would significantly overshadow the Bevis Marks synagogue, irreparably damaging its setting and affecting the light within the building.

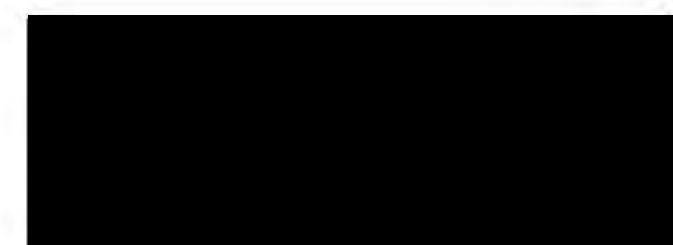
We fully support the creation of this Conservation Area but believe that it is best served by **Option 3** and not by excluding particular buildings and areas in order to limit its scope. We are asking for your support in protecting our local area by commenting on the consultation and making a choice to protect what makes our local area so special as a place where we live, work, and worship. We thank you for your support.



Josh Harris
Priest-in-Charge,
The Guild Church of St Katharine Cree



Shalom Morris
Rabbi,
Bevis Marks Synagogue



Laura Jorgensen
Rector,
St Botolph without Aldgate



RE: Creechurch Conservation Area Consultation

Dear Planning Team,

Thank you for consulting the Georgian Group on the designation of a new conservation area within the City of London. Our statutory remit relates to applications concerning elements of alteration or demolition to listed buildings dating between 1700-1840. **The Georgian Group's charitable objectives are as follows:**

'to save from destruction or disfigurement Georgian buildings, whether individually or as part of a group, monuments, parks and gardens of architectural and historic interest and, where necessary, encourage their appropriate repair or restoration and the protection and improvement of their setting'.

'to stimulate public knowledge and appreciation of Georgian architecture and town planning; of Georgian taste as displayed in the applied arts design and craftsmanship, and its influence on later periods'.

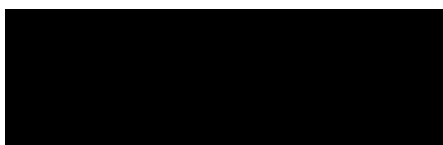
The Group has reviewed the options proposed by your local authority and forward the following comments and recommendations.

Development Threat

The Group objected to two applications within the setting of Bevis Marks Synagogue in 2021, these were for a tower rising to just under 198 metres located at 31 Bury House and a tower rising to just over 93 metres situated at 33 Creechurch Lane. Both these applications, if permitted, would have caused significant harm to the setting and significance of Bevis Marks Synagogue and the Group were vocal in highlighting this threat to the City of London. Whilst the two applications were refused by your local authority, the threat to the synagogue from surrounding development still exists and measures need to be implemented to safeguard the significance of the grade I listed Bevis Marks, the oldest surviving synagogue in England.

Paragraph 10 of the *Conservation Area Appraisal, Designation and Management Second Edition, Historic England Advice Note 1* states that **'conservation area** designation is undertaken to recognise the historic character of an area and/or in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest'.

The Group therefore welcomes the initial steps in designating a conservation area including Bevis Marks Synagogue and acknowledging the rich history of this part of the City of London.



Registered Charity No. 209934

Patron HRH The Prince of Wales
Vice-Patron The Rt Rev. and Rt Hon. Lord Chartres GCVO
President The Duchess of Argyll
Chairman Paul Zisman
Director David Adshead

Significance of Surrounding Area

The Bevis Marks and Creechurch area possesses considerable archaeological, **architectural, artistic, and historic interest and is worthy of designation. The Group's** statutory remit relates to listed buildings dating between 1700-1840 and for this reason only those buildings and their setting dating to this period will be alluded to within this letter. The Group defers to the expertise of other societies on buildings within their periods.

Bevis Marks Synagogue

Bevis Marks is the oldest surviving synagogue in England and is statutorily listed at grade I. It is a rare survival of an extremely well-preserved synagogue which has remained in continual use since its completion in 1701. Externally, the design of the building has drawn comparisons with the city churches of Christopher Wren and the early nonconformist meeting houses – most evidently with their large, arch headed windows. The interior of Bevis Marks bears a strong resemblance to the building of its mother congregation, the Portuguese great synagogue of Amsterdam designed by Elias Bouwman. Historic fabric linking these important synagogues is present in **Bevis Marks, in the form of the great central chandelier which sits over the reader's** platform and four lamp stands that stand before the Torah shrine.

Whilst the architectural interest of Bevis Marks is exceptional, the contribution the building and its associations make to the historic interest of the surrounding area is of the utmost importance. Bevis Marks is the only survivor of three Jewish places of worship in the vicinity. The first synagogue after the resettlement was situated where the existing Cunard House sits and is commemorated with a historic City **Corporation Plaque. Duke's Place was the location of the now demolished Great** Synagogue which was constructed to serve the growing congregation in the area but destroyed by bombing in 1941. Bevis Marks is therefore the last tangible link to the historic Jewish association in this area of London.

The setting of the synagogue not only greatly contributes to the significance of the **building as an architectural composition but also to the synagogue's religious** workings and function. The provision of light into a synagogue is fundamental to the practices of **Judaism and would have been an influential factor in Joseph Avis's** designs. Bevis Marks admits natural light through the large windows on the first floor, providing a suitable environment for the reading and reciting of prayers. This is particularly necessary on the eastern wall of the synagogue where the Ehal is located, which, in the case of Bevis Marks, is made up of three ark cupboards divided by pilasters of the Corinthian order. Setting is influenced by environmental factors, as set out within **Historic England's guidance document GPA3 *The Setting of Heritage Assets***. Reducing the amount of light into the synagogue would harm its setting and therefore significance.

Wrapped around the synagogue is an enclosed space which performs a vital liturgical function in the celebrations of festivals and holy days. This space is seen as an extension of the synagogue and is therefore due equal protection. Threats to this functioning space have been posed in recent years and consent has been rightly refused. Now is the time to provide further protection to ensure the courtyard is allowed to continue to perform its integral function.

Whilst development threats to the south of Bevis Mark's Synagogue have highlighted the impact on the setting and significance of the building, development to the north would have a similar impact. The attached boundary to this letter includes those

buildings facing Houndsditch and Bevis Marks which are consistent in their scale and massing. This scale respects and preserves the setting of the synagogue whilst contributing to the surrounding character and appearance of the Creechurch area. Their inclusion is therefore recommended for the benefit of the wider conservation area.

St Botolph without Aldgate

St Botolph's church is located on the site of an earlier building thought to date to the 16th century but with earlier origins. The current building was designed by George Dance the elder and built between 1741-44. Dance was at this time the Clerk of Works for the City of London, a role he held from 1735 until 1765, and during this time was responsible for the Mansion House at Bank. Dance has a great association with the surrounding area, with his son George Dance Jnr taking up the role of Clerk of Works for the City of London in 1767. St Botolph's church possesses exceptional architectural and historic interest.

Externally, the church is laid in Flemish bond with mixed yellow and red brick and stone dressings. Venetian windows are present to the north, east and west elevations along with Gibbsian surrounds and pedimented doorways forming an impressive classical composition. The church is aligned N-S meaning that the tower, which rises from a pediment topping the body of the church, forms a pleasing view from the south and longer views down the Minories. The tower and spire hold prominence in its surroundings giving it a landmark quality.

The classical composition of the tower and northern elevation is appreciated from the Minories, with the buildings on the western and eastern side framing the church when approaching from the south. Their inclusion within the proposed conservation area is encouraged for the benefit of the surrounding character and appearance and **setting of St Botolph's Church.**

The setting of the St Botolph's greatly contributes to the significance of the church and the prominence the spire has on the surrounding built environment is a key element. The hotel development to the east of the church allows for the spire to appear against a clear skyline when moving along Leadenhall Street onto Aldgate High Street. Whilst development to the rear, notably Irongate House and those buildings between Houndsditch and **Bevis Mark's leading to Duke's Place**, contribute **to the setting of St Botolph's** due to their relatively low-rise design. The consistent roofline and scale along the eastern and western sides of the Minories draws the eye **towards the northern elevation of St Botolph's and the spire creates a pleasing** townscape element. The erection of One Creechurch Place has harmed the setting of **St Botolph's church when viewed across Aldgate Square** from the east, creating the potential for enhancement with future development.

Historic Interest of the Area

The Bevis Marks and Creechurch area has exceptional historic interest relating to the presence of Bevis Marks and those sites where former synagogues were located. The area has important and visible associations with the Jewish community and their resettlement within the City of London during the 17th century. This is a contributing factor to the importance of the proposed conservation area. The presence of Bevis Marks along with the two plaques commemorating the former synagogues within the area represent a unique connection between the area and the Jewish community and for wider Anglo-Jewry relations.

Alongside Bevis Marks Synagogue, two religious buildings in St Botolph's without Aldgate and St Katherine's Cree creates a distinct character of important religious institutions.

Legislation

Section 69(1) of the Planning (Listed Building and Conservation Areas) Act 1990 sets out the requirement for local authorities to determine areas which it is desirable to preserve and enhance, and designate them as conservation areas. Section 69(2) sets out the requirement for local authorities to review their past activities in this area, including existing conservation areas, and to add more conservation areas.

Recommendation

The Georgian Group supports the designation of the Creechurch and Bevis Marks Conservation Area, however certain additions should be made to fully reflect the special interest present.

To protect the setting and significance of those buildings falling within the Group's remit, we support option 3 with additional buildings to the east and south. The extent of this new boundary is shown in the map attached to this letter. There is a clear special interest within the area of Bevis Marks and Creechurch and for this to be fully recognised we recommend the City of London adhere to Option 3 with those additions to the east and south.

Options 1 and 2 put forward do not address the imposing threats of development in the vicinity and the need to expand on this is integral to character and appearance of the proposed designation. Omitting 31 Bury Street and One Creechurch Place would leave two plots of land located within the middle of the proposed conservation area open to development. If development was permitted on these two plots it would put into question the special interest of the conservation area, as well as causing serious harm to the significance of Bevis Marks synagogue.

Including those buildings to east and south of option 3 would ensure the landmark **quality of St Botolph's church is preserved. The church and its spire are prominent in** views down the Minories and from across Aldgate High Street. Extending the conservation area boundary to protect this would enhance the special interest associated with the designation. Whilst including those buildings facing Houndsditch is integral to preserving the setting of the Bevis Marks Synagogue courtyard.

Not all buildings within a conservation area will contribute to its importance and their inclusion should be seen as an opportunity to manage change and create the opportunity to address past harmful development, as set out within the Historic England guidance on conservation areas.

Designation reflecting the boundary put forward within this letter would help solve the potential threat on assets of the highest importance. Expanding the conservation area to the north to include those building on Houndsditch would preserve the setting of Bevis Marks synagogue, whilst expansion to the south and east would **preserve the landmark quality of St Botolph's church.**

Yours Sincerely,

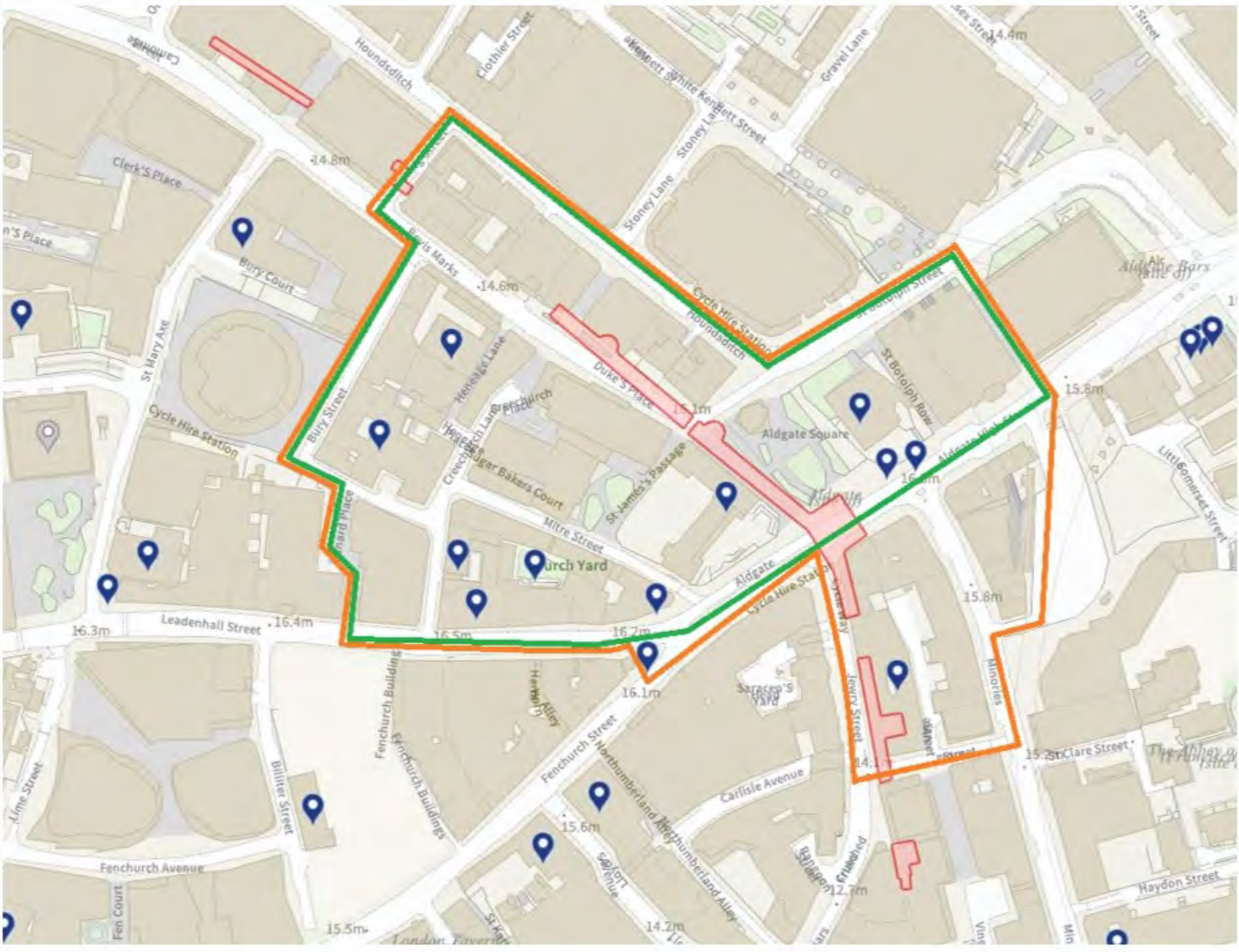
Edward Waller (Conservation Adviser for London and the Southeast)

Map showing the boundaries of Option 3 (as per consultation) and Option 3 Plus as proposed by SAVE Britain's Heritage (Map Base: Historic England)

Option 3 Boundary

Option 3 Plus Boundary

- Listed building
- Remains of London's Roman Wall - Scheduled Ancient Monument





Historic England

By email:

PlanningPolicyConsultations@cityoflondon.gov.uk

Our ref: PL00794106

Historic Environment Team
Department of the Built Environment
City of London
PO Box 270
London
EC2P 2EJ

Date: 6/11/2023

Dear Historic Environment Team

Re: Public Consultation on the proposed Creechurch Conservation Area designation

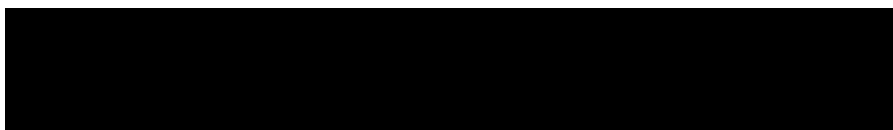
Thank you for consulting Historic England on the City of London's proposal to designate the Creechurch Conservation Area.

We have reviewed the consultation documents in light of the *National Planning Policy Framework* (NPPF, 2023) which requires, as one of its core objectives, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Historic England updated its conservation area guidance in 2019, which you may find useful: *Conservation Area Appraisal, Designation and Management Historic England Advice Note 1* (Second Edition) dated 8th February 2019 <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

Historic England Advice

The City of London's area proposal documentation, dated 23 July 2023, clearly demonstrates that the area displays considerable architectural and historic interest consistent with the requirement for local planning authorities to designate areas which it is desirable to preserve and enhance (Section 69(1)) of the Planning (listed buildings and conservation areas) Act 1990. We would therefore support the designation of a conservation area in this case, although we recommend that you give further consideration to its extent.



Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



The area encompasses the former monastic precinct of Holy Trinity Priory, a number of exceptional religious buildings and spaces, and many fine commercial buildings, including the grade II* listed Holland House and richly embellished warehouses. The religious history of the area is reflected in the three exceptional grade I listed buildings: Bevis Marks Synagogue; the church of St Botolph-Without-Aldgate; and the church of St Katherine Cree. As identified in the proposal document, the archaeological potential, place names, forms and spaces with its hidden courtyards and churchyards all help to underpin the area's strong sense of history.

The consultation sets out three potential conservation area boundary options. Two options are proposed by the City of London, with Option 1 (the City's preferred option), tightly drawn to exclude 31 Bury Street. Option 2 includes 31 Bury Street and creates a more legible boundary along Bury Street. A third proposal, prepared for Bevis Marks Synagogue by Alec Forshaw and Esther Robinson Wild, sets out a case for a wider designated area. This third option provides additional analysis of architectural character and scale and further recommendations to inform the subsequent appraisal and management guidelines.

Having reviewed the proposals, Historic England recommends an enhanced version of Option 2, incorporating 31 Bury Street, Cunard House and One Creechurch Place; we think this would be the most compelling conservation area boundary (see attached map).

To the south of Bury Street, we consider there is clear merit in the inclusion of Cunard House. The site of the first Synagogue, built in 1657 (commemorated by a plaque), Cunard House also responds positively to No 80 Leadenhall Street, and the church of St Katherine Cree. The current Cunard House is of some architectural merit and to the rear provides an appropriate sense of enclosure to Creechurch Lane and Bury Street, where it responds well to the scale of the street.

31 Bury Street was built as an extension to the grade II* listed Holland House in 1967. In our view this building should be included within the conservation area. To explain that recommendation we refer to the following advice in paragraph 58 of Historic England's Advice Note No. 1:

Setting and views - 58. Heritage assets can gain significance from their relationship with their setting whilst views from within or outside an area form an important way in which its significance is experienced and appreciated. This part of the appraisal should identify how the landscape or townscape that the area is located within contributes to its special interest, perhaps by providing approaches along historic routes or visual connections between different areas that illustrate an important historic relationship.

31 Bury Street is sympathetic to the general scale of historic development in views along Bury Street and Creechurch Lane. It occupies an integral and significant part of the townscape within the proposed conservation area at the junction of Creechurch Lane and Bury Street and to omit this site would create an inconsistent boundary cutting into the historic street pattern. It is therefore logical that building is included within the conservation area and that in the event of





redevelopment, any replacement is subject to appropriate requirements to ensure it contributes positively to the character and appearance of the area.

We would also recommend the inclusion of the South eastern section of Bevis Marks/Dukes Place/Houndsditch from (and including) No 17 Bevis Marks to Irongate House. The City Wall is a key influence on the street pattern and survives below ground and in basements; although it is well protected as a scheduled monument, it is also a key influence on the historic street pattern as reflected above ground. No 17 Bevis Marks and No 40 Greenly House are imposing handsome classically inspired commercial buildings which form the northern extension to Creechurch Lane and contribute positively to the area. No 17 Bevis Marks is by Lewis Solomon, a prominent Jewish architect with associations to Aldgate and Whitechapel. Irongate House (1978) is somewhat of an architectural anomaly constructed from exceptionally rare granite. It occupies the prominent southern corner of Dukes Place and is well proportioned.

We note that other heritage bodies have suggested wider boundaries, all of 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 scale of the historic townscape through appropriate parapet 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.

We note that both City options include the grade II listed Aldgate pump, which is excluded from Option 3. We agree that this important historic feature, which is both artistically pleasing and reflects the wider social history of the area, should be included.

Conservation Area Appraisal and Management Plan

The proposed conservation area is subject to extensive development pressure and as such its preservation and enhancement will depend upon a robust approach to the wider management of the area. In the event of designation, we would support the Option 3 proposal report which



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Correspondence or information which you send us may therefore become publicly available.



Historic England

calls for any subsequent appraisal and management plan to set out robust guidance on how development within the area and its setting should respond in order to preserve or enhance its character and appearance. The appraisal and management plan should seek to identify key views and landmarks from both within, and outside of, the designated area and identify sensitivities and opportunities for enhancement. This management plan should complement and reinforce policy protection for individually designated heritage assets within the area and their settings.

Guidance should also identify opportunities for new development to enhance the area through reinstating the appearance of finer grain development and by seeking opportunities to reconnect historic street patterns. Attention should also be given to ensuring that new development incorporates more active frontages where appropriate.

Conclusion

Subject to the above recommendations, Historic England welcomes the proposal to designate the conservation area and considers this will make a valuable contribution to the future management of this important historic quarter of the City.

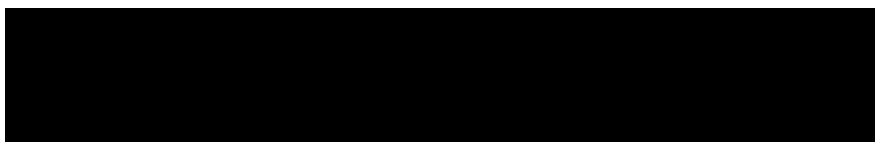
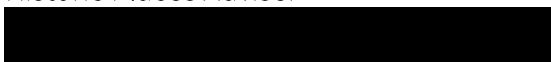
In the event of designation, we would expect the City to produce a full conservation area appraisal and management plan which addresses the key issues of development pressure, and the impact development within the conservation area and its setting can have on its special character. Given the pressure for change and the sensitivity of the area we would greatly value the opportunity to work with the City and key stakeholders to develop a robust management plan for the area in order to preserve and enhance its character and appearance.

I hope you find the above observations helpful. If you wish to discuss any of the above issues, please do contact me.

It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment.

Yours sincerely

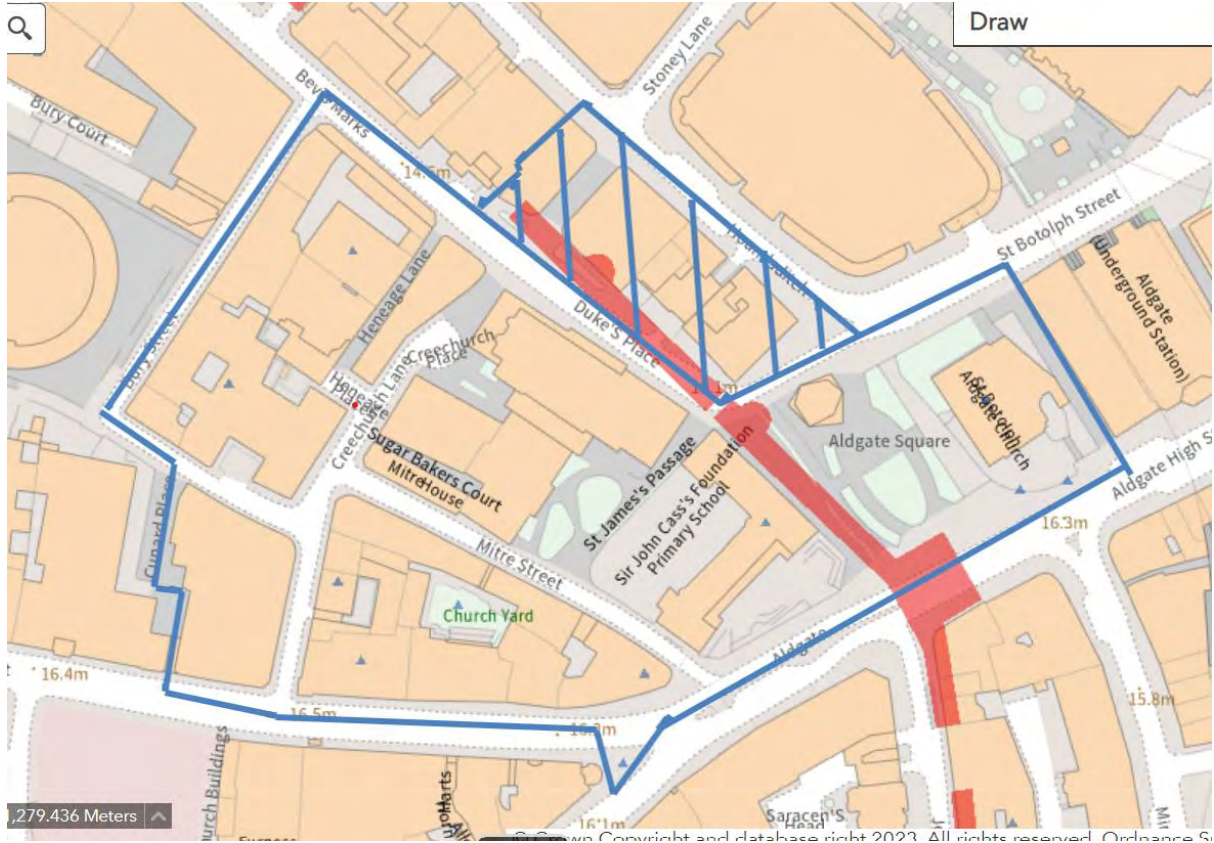
Richard Parish
Historic Places Adviser



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Appendix One

Creechurch Conservation Area Boundary Proposal: Historic England proposed boundary showing appropriate minimum extent and recommended Houndsditch extension to include Creechurch Lane (north) and scheduled ancient monument.



Koukouthaki, Katerina

From: Jeremy Randall [REDACTED]
Sent: 06 November 2023 09:25
To: McNicol, Rob; Koukouthaki, Katerina; Nancollas, Tom
Subject: Creechurch Conservation Area Consultation.

THIS IS AN EXTERNAL EMAIL

Dear Rob, Kat, Tom,

We write on behalf of our client, Merchant Land, and submit representations to the consultation on the proposed designation of the Creechurch Conservation Area.

Merchant Land own the building at 33 Creechurch Lane, which is in the centre of the proposed Conservation Area.

Katherine McCullough of Merchant Land addressed Members of the Planning and Transportation Committee in July 2023 and indicated Merchant Land's in principle support for the establishment of the new Creechurch Conservation Area. In particular, Merchant Land highlighted that such a heritage designation would *inter alia* provide an "an excellent opportunity to provide well considered guidance for decision makers, officers, land-owners and local stakeholders".

Merchant Land remain supportive of the principle of the creation of the Creechurch Conservation Area as set out in the Creechurch Conservation Area Appraisal prepared by City of London in July 2023 in respect of Option 1. This option has been prepared by expert officers and the evidence prepared as part of an Appraisal as required by national Guidance.

It is considered that the assessment conducted by City officers aligns with the legislation, relevant policy, and guidance required in respect of the preparation of Conservation Area designations, and Merchant Land agree that the area of the proposed Conservation Area set out in Option 1 is broadly of sufficient architectural and historic interest to be designated a Conservation Area. This is not the case for Option 3.

Merchant Land have reviewed the proposed options for the proposed Conservation Area and the accompanying material prepared by the City Corporation and the Bevis Mark Synagogue.

Merchant Land consider strongly that the extent of the Conservation Area should not be drawn on the basis of one stakeholder's assessment of the area (Option 3), which will inevitably bring a bias to the process. Guidance is clear that a Conservation Area designation should not be to protect buildings which are not of special architectural or historic interest, or areas that lack special interest (NPPF, 2023, para 191).

Merchant Land are of the view that Option 1, which has been prepared by City Officers with the appropriate expertise in this heritage field, should form the basis of the Conservation Area. It is right that the impartiality of the City's assessment should be given more weight by the decision makers in concluding on the appropriate extent. In particular, we note in the Synagogue's assessment of the proposed extended Conservation Area, that they make unsupported assessments about "appropriate height" and identifying buildings as "positive contributors" in order to unjustifiably widen the extent of the proposed Conservation Area. This assessment is at odds with the City's assessment and as a result, having regard to the NPPF and Conservation Area designation guidance, adopting this approach would devalue the Conservation Area by including areas that lack special architectural or historic interest.

It is considered that Option 3 is not in line with policy and guidance in respect of designation criteria. The inclusion of buildings lacking special architectural or historic interest within the proposed boundary has not been justified within the Synagogue's appraisal. Accordingly, it is considered that the decision makers should give limited weight to the submission with regards to Option three and base the implementation of the new Conservation Area on the

impartial assessment prepared by the City officers who we are confident have given careful consideration to heritage issues at hand and the strongly held views of key stakeholders including those of the Synagogue.

Our specific responses to the consultation questions are as follows:

1. *Do you agree that the Creechurch area should be designated as a conservation area?*
 - Yes
2. *Which is your preferred option? If you don't like any of them you can offer an Option 4.*
 - Option 1
3. *If you choose Option 4, please describe your preferred boundary.*
 - N/A
4. *Why do you think your selected area is of special architectural or historic interest?*
 - As set out above
5. *Please share any additional general information and facts about the area to support your choice.*
 - As set out above

We would be happy to elaborate on these representations if helpful. Please can you confirm safe receipt of these representations.

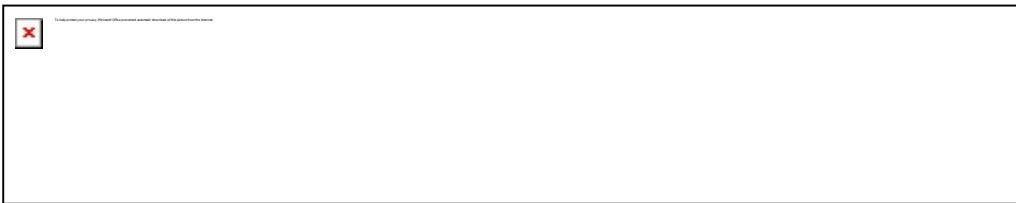
Kind regards,

Jeremy

Jeremy Randall
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6 November 2023

Dear City of London Planning Department,

I'm writing to express my personal views on the proposed Creechurch Conservation Area. I write this as the rabbi of Bevis Marks Synagogue, a PhD student in Jewish history at King's College London, and as a resident in the proposed area with a deep understanding of its streets and character.

I've used these past weeks to reflect on the different proposed boundary options. Without question only Option 3 reflects the history and needs of Bevis Marks Synagogue, the British Jewish community, and the cohesion of the area more broadly.

What follows is a consideration of three different components of Option 3. They reflect three different issues that set Option 3 apart from Options 1 and 2, and that warrant its full adoption.

1. 31 Bury St - The exclusion of this site in Option 1 is deeply inappropriate and profoundly offensive.
 - A. It is clear that a tall building on this site would harm the synagogue. This has already been demonstrated in numerous studies (light, setting, etc) and confirmed in a prior planning decision. This should be reason enough to include in the CA, if it is indeed going to conserve the area at all.
 - B. 31 Bury has direct views down Heneage Lane over the all-important eastern windows of Bevis Marks Synagogue making it clearly part of the setting of the synagogue. Any change to the current building would result in immediate impact on the synagogue, and as such it cannot be considered a different area.
 - C. It sits next to Grade 2* Holland House, so it is clearly part of its setting.
 - D. It shares a party wall with Holland House, so it is clearly part of the same 'area' and cannot reasonably be excised from it.
 - E. It was built as an extension of Holland House, so is clearly both a part of its setting and shares the same area.
 - F. The exclusion of this site would essentially create the feeling on the ground of two different areas, that around the synagogue and the area of the churches. Any inappropriate redevelopment would essentially divide between the two pockets, removing any sense of cohesion between the two that is currently maintained by the similarity in massing of the current site with the area of the synagogue and the churches.

2. Creechurch Lane - This is the name given to the Conservation Area, and yet, numerous buildings along it have been excluded in Options 1 and 2.
 - A. The exclusion of so many buildings will lead to redevelopment which could eradicate the cohesion currently maintained along this area due to the similarity in massing of nearly every buildings along it.
 - B. Cunard House is the historic site of the 'Synagogue of the Resettlement' the place where Jews first met for worship upon being readmitted to England in 1656, following their expulsion in 1290. It is difficult to overstate its historic importance, and for that reason it is marked with a historic plaque. Without question it should be included in the Conservation Area.

- C. 1 Creechurch Place is the historic site of the 'Great Synagogue', the spiritual home of Ashkenazi Jewry from 1690-1941, when it was destroyed in the Blitz. It too is marked with a historic plaque, reflecting its immense historic significance, and it should therefore not be excluded.
 - D. Together with Bevis Marks Synagogue, these three synagogues reflect the Historic Jewish District of London which was centred along Creechurch Lane and the surrounding area. Only by including all of these sites will the cohesion of the entire area be maintained and allow for the preservation of this hugely important historic Jewish area and its story.
 - E. Finally, each of the synagogue sites reflect a different stage in the Jewish community's acceptance into Britain as understood by historians. Creechurch Lane Synagogue was a 'house' synagogue, Bevis Marks Synagogue was a 'private' synagogue kept within a courtyard, while Dukes Place Synagogue was a 'public' synagogue built along a public thoroughfare. Together, they reflect an important evolution in British religious tolerance and Jewish comfort in England. Excluding any of these sites would diminish the ability to understand this history, an exceptionally important story that should be preserved and celebrated in Britain today.
3. Bevis Marks/Dukes Place - The buildings along this street run along the route of the London Wall, with its archeology extant below ground.
- A. Their inclusion allow for a natural and fitting edge to the Conservation Area, as the Jewish community's location was not randomly located, but specifically situated at the periphery of the City. This reflected the degree to which the community was permitted to settle in the City, but still kept at its edge. The inclusion of these buildings will help future generations to 'read' this history through thoughtful future redevelopment.
 - B. The Hebrew name of Bevis Marks Synagogue is 'Gate of Heaven' (taken from the Biblical dream of Jacob's Ladder). This name was likely selected to reflect the synagogue's proximity to London Wall and the nearby gates at Aldgate, Bishopsgate, etc. The community imagined that while those locations were gates into the city, the synagogue was the gate to heaven. By including the route of the wall within the the Conservation Area, this important association and self-understanding can be recalled and highlighted.
 - C. The proximity to London Wall to both the medieval Priory Holy Trinity and the inn of Bury St Edmonds Abbey (where the synagogue is now located), is also necessary for understanding their histories at the City's edge and their role with travellers, such as with St Botolph's Church Without Aldgate.
 - D. The sites along this route if not appropriately redeveloped would negatively impact Bevis Marks Synagogue if built to a height that blocks out the morning light, which is already diminished by previous unsympathetic development. The opportunity to protect the synagogue from this further harm should be embraced by the inclusion of this street in the Conservation Area.

You can see more about these three issues in the following videos that I've made both previously and more recently in response to the consultation:



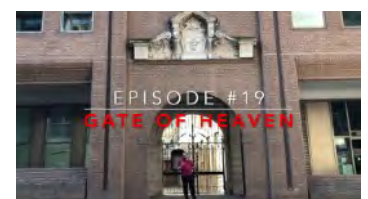
Creechurch Lane



31 Bury St



London's Historic Jewish District



London Wall

It think it goes without saying that the exclusion of 31 Bury St, or the sites of synagogues already recognised for their historic importance with memorial plaques, would stand at odds with the legal responsibility to promote community cohesion and to protect the rights of a minority community. It is simply indefensible to exclude 31 Bury St knowing that a tall building on its site would harm a synagogue. Indeed, inclusion of these sites is an opportunity to fulfil the objective of this law and for the City to demonstrate leadership and cultural understanding and sensitivity. Not doing so, would send an entirely different message to the Jewish community and wider society, and mark a dangerous precedent of not adhering to such a deeply important law in multicultural Britain.

Finally, I would add that I think this is an opportunity for the City to capitalise on future opportunities that only boundary Option 3 would afford. The creation of this Conservation Area would allow the area around Creechurch Lane to truly become a cultural destination, much as is the case in historic Jewish areas in places like Venice and other European cities. It would demonstrate the City's appreciation for its Jewish history and current-day Jewish community, and encourage this history to be further highlighted in new redevelopment and cultural offerings.

I see the adoption of Option 3 as a turning point in community relations, and ultimately as a win-win for both the Jewish community and the City of London. Let's not squander this moment, or usher in another round of planning battles that would surely ensue by adopting another option.

Thank you for the consideration.

Best,

Rabbi Shalom Morris

SAVE
BRITAIN'S HERITAGE



**PROPOSED
CREECHURCH
CONSERVATION
AREA**

1st November 2023

INTRODUCTION

SAVE Britain's Heritage is delighted that the City Corporation has elected to consider designating a new Conservation Area in the Creechurch, Bevis Marks and Aldgate area. This is a deeply historic area of London whose significance is under-recognised in terms of heritage designation.

In responding to the current consultation SAVE has assessed the site and buildings by way of site visits – including the public exhibition on Friday 20th October – as well as consideration of the two reports accompanying Options 2 and 3, reference to architectural reviews including Niklaus Pevsner's Buildings of England and consultation with experts on this historic area of London.

Following careful assessment, we fully endorse Option 3 as proposed by Alec Forshaw and Esther Robinson Wild plus several key additions which are shown on the attached Option 3 Plus map and detailed in the supporting text below. For clarity, we have titled our proposed boundary area Option 3 Plus to reflect the alignment with the current Option 3 but including the expanded areas. For comparison, both boundaries are shown in the map on the following page.

The following assessment focuses on the extensions we have deemed to be appropriate, coherent and justified additions to the proposed Conservation Area. We defer to other statutory heritage bodies on particular buildings, features and / or additions which fall within the period of their expertise.

OVERALL SPECIAL ARCHITECTURAL AND HISTORIC INTEREST

Historic England's *Conservation Area Appraisal, Designation and Management Second Edition, Advice Note 1* states that: "conservation area designation is undertaken to recognise the historic character of an area and/or in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest".

The Advice Note goes on at para 11 to set out three questions for use when defining eligibility for conservation area status:

- a. Does the area have sufficient architectural or historic interest for the area to be considered 'special';
- b. Whether this is experienced through its character and appearance;
- c. Whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help solve.

We consider the proposed Creechurch Conservation Area satisfies all these criteria, being both of exceptional architectural, historic and evidential significance, all of which are readily evident in the experience and character of being in the area. There are issues of neglect in places and well documented ongoing development change. Designation would provide a positive policy toolkit for addressing these issues and managing them in the future. In this sense, SAVE considers the area to be an anomaly, being of exceptional historic significance but thus far unrecognised or protected in planning terms.

Despite its near total inclusion within the City's designated Eastern Cluster boundary area for tall buildings¹ (see map excerpt on page 5), the Creechurch locality remains fundamentally low scale. It exhibits a collection of exceptionally important historic, architectural and cultural landmarks studded amongst a range of unlisted buildings which contribute positively to historic sense of place. Three of these landmarks are listed at grade I, including the internationally significant Bevis Marks Synagogue, a survivor of the highest historic and cultural order. These buildings are carefully and convincingly assessed in both the City's draft Conservation Area Proposal text accompanying Option 2, and the report accompanying

¹ Defined by the City as buildings over 75m Above Ordnance Datum (AOD)

Option 3. We do not propose to repeat this material here but add our strong support to the justification and content of Option 3 of the consultation.

The area also contains a rich collection of non-designated heritage assets, many of which follow the City's medieval street pattern. All currently benefit from no planning protection or heritage recognition despite forming a rich ensemble of buildings reflecting multiple historic periods, architectural styles and cultural uses in the area for over 1000 years. Beyond historic and architectural interest, the area is also of extraordinary evidential and archaeological interest, from the surviving elements of the Roman wall (now a scheduled ancient monument) and the grade II listed remains of Holy Trinity Priory houses in nos 39-40 Mitre Street, to the Bevis Marks Synagogue and the deep social and cultural association this building has with the Sephardic Jewish community in this part of London, a link which has remained unbroken since the late 18th century.



Bevis Marks Synagogue sits within an enclosed courtyard but was designed with windows to all elevations to maximise light into the historic interior. Further protection of its setting would be a major benefit of Conservation Area designation (Credit: SAVE Britain's Heritage)

The area's unusually low-scale character reaches its climax at Aldgate Square, an attractive open space which creates exhilarating and increasingly rare short and long distance views through the conservation area. Many are framed and complimented by the long arterial streets which punctuate the proposed Conservation Area and which create coherent borders in terms of scale. These include Houndsditch to the north, and Leadenhall Street and Aldgate to the south, but also the historic thoroughfares of Jewry and Minories, whose width and length promote the enjoyment of historic views of the areas listed landmarks.



Above: Aldgate Square forms a focal point for the conservation area which creates a visual and practical connection with the historic buildings on both sides of Aldgate High Street (Credit: SAVE Britain's Heritage)

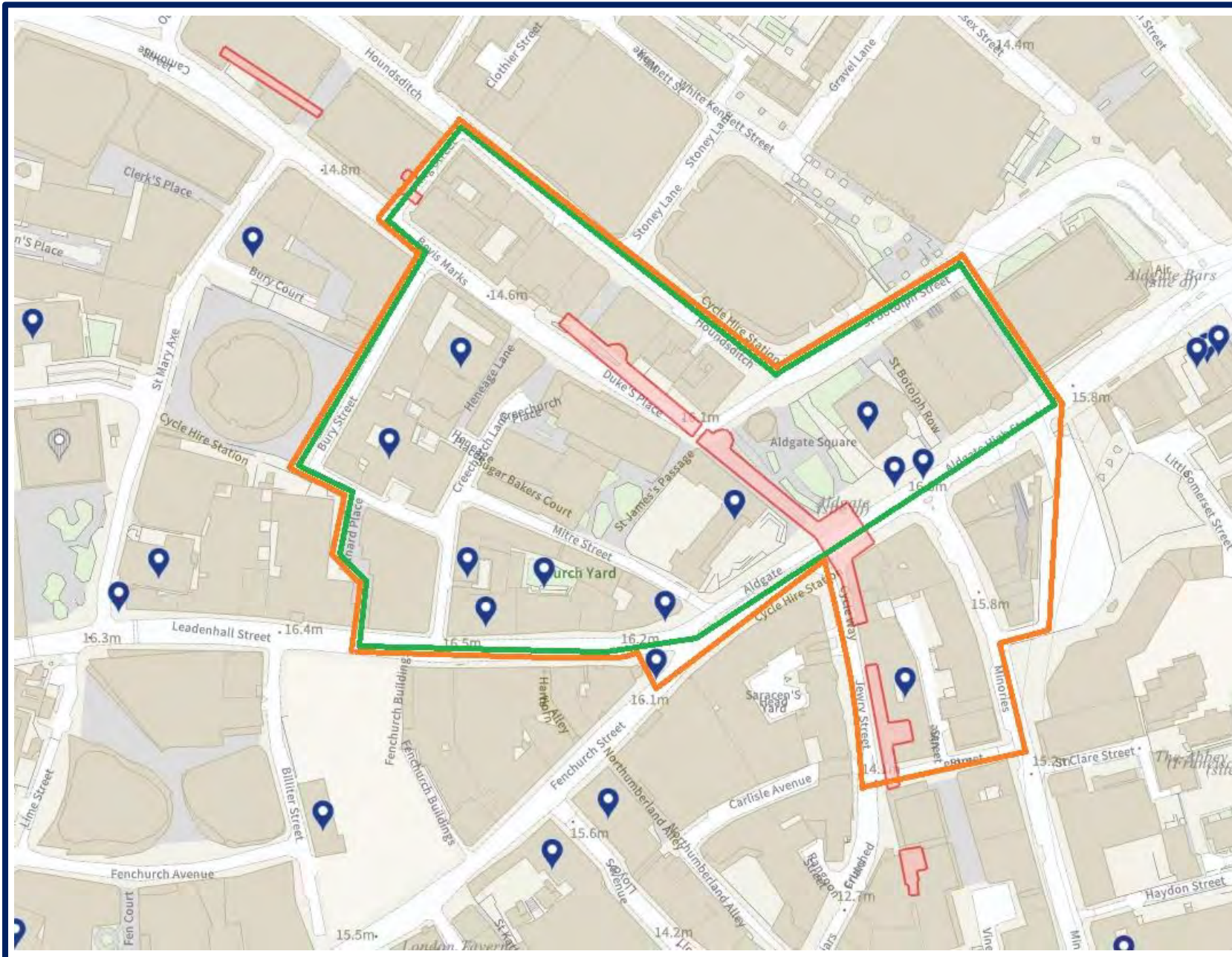


Left: Portsoken Pavilion by Make Architects was completed in 2018 to mark the new public space in Aldgate. Built from glass, wood and steel the building is a sculptural monocoque and a positive addition to the character of the area and a good example of the kind of sympathetic new development a conservation area would promote more of (Credit: Courtesy of Make Architects)

PROPOSED BOUNDARIES

In line with Historic England's Advice Note guidance, the boundaries proposed by SAVE are an extended version of those proposed in Option 3 of the consultation. To facilitate clear policy enforcement, all boundaries run down the centreline of roads, with the exception of the passageway through Cunard House from Bury Street through to Leadenhall Street. We consider running conservation area boundaries along party walls of existing buildings, as is proposed in the City's Option 1 boundary map at 31 Bury Street, raises immediate issues over fabric and setting impacts of possible development and how these would be treated. This is particularly the case with Option 1, where the boundary proposed would skirt along the party wall of the grade II* listed Holland House.


OPTION 3 & PROPOSED OPTION 3 PLUS BOUNDARIES MAP




Map showing the boundaries of Option 3 (as per consultation) and Option 3 Plus as proposed by SAVE Britain's Heritage (Map Base: Historic England)

Option 3 Boundary

Option 3 Plus Boundary

 **Listed building**

 **Remains of London's Roman Wall - Scheduled Ancient Monument**

MANAGING DEVELOPMENT PRESSURE POSITIVELY

The Bevis Marks Synagogue is one of the most important historic synagogues in the world, and of international significance. The sensitivity of its setting was a key reason for the refusal of recent plans to erect a 47 storey tower in place of the building at 31 Bury Street and a 27 storey immediately adjacent on Heneage Lane. On this basis, we consider the inclusion of 31 Bury Street, as presented in Options 2, 3 and now our proposed Option 3 Plus, to be both logical and justified. If the Synagogue is to be a fundamental feature of the proposed conservation area's special interest, including its immediate setting is both logical and necessary if the integrity of its grade I listing and the conservation area is to be enforceable. The omission of 33 Bury Street and the emerging plans for a 42 storey tower on the site risks undermining this.

Protection of the synagogue and its setting would therefore be a primary function of any conservation area designation. The inclusion of the procession of 20th century office buildings to the north of Duke's Place would act as a positive barrier to insensitive development already encroaching on the area, including extent permissions along Houndsditch.

We also view conservation area designation as a positive tool for promoting sympathetic new development which would enhance the character of the area. Extending the conservation area boundary to include the buildings and streets proposed under SAVE's Option 3 Plus would encourage this approach to development, allowing the historic environment to be celebrated whilst adapting to changing needs and uses.



Map from The City Plan (2014) showing the currently adopted Eastern Cluster Area for tall buildings, which covers a substantial portion of the proposed Creechurch Conservation Area. Designation would complement existing planning guidance by providing specific guidance on the character and location of new development within the historic Creechurch and Aldgate locality (Credit: Page 70 of City Plan)



View up Mitre Street towards 31 Bury Street and the Gherkin behind. 31 Bury Street appears well scaled in this context, with contrasting façade materials and detailing creating a sense of variety at the termination of the street, further enhancing the setting of the listed warehouses either side (Credit: SAVE Britain's Heritage)

CURRENT UNDER-DESIGNATION

The coherent and low scale character of the area as a whole, including the extensions proposed, is as remarkable as the survival of so many landmark buildings and streets which reflect the development of many of the City's earliest communities and cultural activities. Yet this part of The City, approaching the eastern boundary with Tower Hamlets has been long under-recognised in planning and heritage terms.

Paragraph 75 of Historic England's Advice Note on designation highlights "the need to consider whether the setting is itself sufficiently protected by national policy or the policies in the Local Plan." Bar one, none of the buildings proposed in SAVE's extended boundary area currently benefit from no protection, despite forming a critical part of the setting of listed landmarks within, and views into, from and across the conservation area. Including them in the proposed conservation area is therefore a key opportunity to address this issue. Including these extensions in the conservation area would also afford these positive buildings protection against demolition under permitted development rights.

PROPOSED EXTENTIONS – OPTION 3 PLUS

The extensions proposed in SAVE's proposed Option 3 Plus Conservation Area Boundary draw on the same criteria for which the current options have been proposed for designation. The extensions proposed here include a range of designated and undesignated historic buildings to the South Eastern corner of the proposed conservation area which share important characteristics, scale and significance with the existing boundary area. We consider their inclusion would be complimentary and coherent in the overall recognition of this area as a conservation area of national importance. The additions are as follows:

EXTENSION 1: ALDGATE UNDERGROUND STATION



Left: The 1926 frontage to the unlisted Aldgate Underground Station | Right: Blue Boar Alley looking north, which would form the eastern boundary of the expanded Conservation Area proposed by SAVE and others (Option 3 Plus) (Credit: SAVE Britain's Heritage)

Significance

Aldgate Underground Station is an unusual survivor and an important historic landmark deserving of inclusion in the conservation area. The frontage building is by Charles Walter Clark built in 1925-26 and exhibits the classic white faience style which is familiar from other Metropolitan Line stations at Paddington, Willesden Green and Farringdon, which are all Grade II listed. Farringdon also shares a similar combination of Victorian Train shed and 1926 frontage. Aldgate's great iron trainshed behind the frontage was built by the Metropolitan Railway in 1876 as its new terminus stations and was retained when the frontage building was rebuilt in the 1920s.

The trainshed and station below retain many features of the original design, including the unusual turquoise and maroon tiling patterns at street level, with decorative ironwork platform canopies, stock brick retaining walls and cast-iron columns supporting these structures from below, with attractive symmetrical staircases connecting street level to platforms.



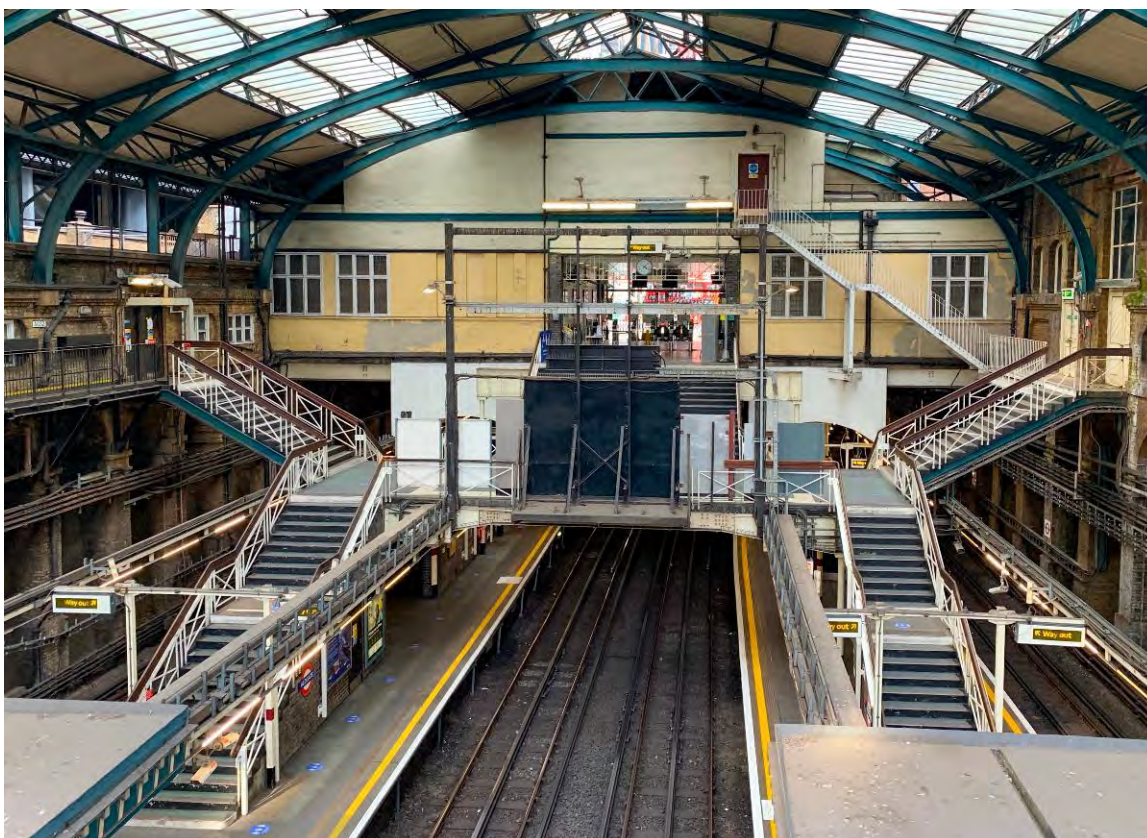
View looking north within the Victorian trainshed of Aldgate Underground Station, completed in 1876, with the cast iron span roof over the four platforms below (Credit: SAVE Britain's Heritage)

Justification for inclusion

The survival of the 1876 trainshed extant today is remarkable, and despite its low scale at street level, is of clear landmark quality when viewed from all directions along Aldgate High Street. Its inclusion would also create a strong and legible bookend to the conservation area on the north side of Aldgate High Street. Despite its clear historic significance and townscape contribution, the station has no form of heritage protection. Extending the boundary eastwards to include the station would provide this, with the boundary terminating along Blue Boar Alley allowing for a clear and coherent boundary which would also relate well to the other extensions proposed below.



Etching of Aldgate Underground Station trainshed at platform level in the 1890s, with the island platform canopies on either side – the cast iron columns and spandrels are largely still extant (Credit: Wikipedia)



Views looking south within Aldgate Station towards the ticket hall and entrance, with the decorative symmetrical staircases either side (Credit: Wikipedia)

EXTENSION 2: AREA BOUNDED BY ALDGATE HIGH STREET, MINORIES, INDIA STREET, AND EASTERN SIDE OF JEWRY



The Victorian terrace along the south side of Aldgate High Street (73-78) with Minories to the right side (Credit: SAVE Britain's Heritage)

73-78 ALDGATE HIGH STREET, 1 MINORIES, 2-5 MINORIES AND 6-12 MINORIES

Significance

The buildings which characterise the southern side of Aldgate High Street form and the north eastern side of Minories are interesting and increasingly rare Victorian survivals. **73-78 Aldgate High Street** is a terrace of six mid Victorian properties is a very fine composition, and a rare survival in this part of the City's eastern fringe both in terms of collective survival as a single historic urban block and its low-scale. All these buildings are of four storeys and exhibit a rich and diverse mix of ashlar and brick facades. **Nos 73-75 Aldgate High Street** form an elegant tripartite classical features frontage, including fluted and rusticated pilasters, a dentil cornice and central triangular pediment. The windows on the upper two storeys display attractive lugged architraves.



The attractive frontage of Nos 73-75 Aldgate High Street (Credit: SAVE Britain's Heritage)

Spanning just three bays, **No.76 Aldgate High Street** is the narrowest on the terrace but is distinct for its original arched sash windows set in a pale yellow stock brick façade decorated with stone dressings and a decorative painted guilloche inset below the pediment. **Nos 77 and 78 Aldgate High Street** are of an earlier Italianate style, of paler brick and decorative fenestration. Architraves at 1st floor level are characterised by decorative consoles and cornices. **No. 78 Aldgate High Street** is the former Rose & Crown public house (archive photograph below).

No.1 Minories is a handsome curved Neo-Georgian five storey edifice of red brick with stone dressings and classical elements such as the corner window pediment, multi-pane sash windows, deep dentiled cornice at 2nd floor level and segmental pediments to the attic dormers. This building and Portsoken House opposite create a generous splayed corner at the junction of Minories and Aldgate High Street which only add to the landmark nature of views to and from the grade I listed church of St Botolph without Aldgate.

The collective presence and survival of these buildings on the areas medieval street pattern focuses and frames the view north up Minories towards the church tower of St Botolph without Aldgate. Sheet 121 of Goad's Insurance Maps Vol III (copied below with buildings circled in green) shows that 76-78 Aldgate High Street, 1 Minories and 6-12 Minories were all extant by 1887, with their historic footprint backing on to the underground railway cutting behind still clearly visible.



Sheet 121 of God's Insurance Plan Vol III, showing the area immediately south of Aldgate High Street in 1877. Green boundary shows the buildings which are still extant today (Credit: London Picture Archive)



The view looking north up Minories, framed by Portsoken House on the left and 1 and 2-5 Minories on the right-hand side (Credit: SAVE Britain's Heritage)



Left: Historic photograph of 76 and 78 Aldgate High Street which once house the former Rose & Crown Public House | Right: 1 Minories which spans the wide corner with Aldgate High Street (Credit: SAVE Britain's Heritage)

2-5 Minories fills a gap site on the eastern flank of the street, with the current building noted in Pevsner as being the work of 'Keith Dalton & Associates, 1986-88, with rounded verticals and green cladding'. We defer to The Twentieth Century Society on the more detailed architectural merits and contribution of this building to the area.



Justification for inclusion

These buildings currently benefit from no heritage protection and are showing clear signs of neglect and / or vacancy on many of the upper floors. The variety of architectural language within the terrace and its intact survival (bar 2-5 Minories) is of both architectural and historic significance, and together they would contribute strongly to the special interest of a proposed conservation area. In turn designation would provide the tools to address this neglect and bring these historic buildings back into full and vibrant use.

They also share a clear relationship with the generally low scale of the proposed conservation area, and help frame important views of landmarks identified as key features of the conservation area. We therefore consider their inclusion to be fully justified. The pressure of largescale development on Aldgate High Street could negatively impact these buildings unless they are afforded some degree of protection. The approved scheme at 60 Aldgate High Street is a case in point. Conservation area designation would provide guidance on how to manage development like and help shape it more sympathetically earlier in the planning process.

Existing



Existing and Proposed views showing the view-to-be looking east with the currently undesignated Underground Station to the left and the unlisted Victorian terrace of 73-78 Aldgate High Street to the right (Credit: Planning Documents)

Proposed



The new Aldgate Square has strengthened the physical and historic connection between the historic buildings and streets to the north and the south of Aldgate and Aldgate High Street. Extending the conservation area boundary in line with Option 3 Plus is therefore justified in terms of the shared character and historic development of these two sides of Aldgate. Designation would formalise this connection in the planning process for future development, facilitating greater positive change within the wider area, including along Jewry Street and Minories, where the current historic buildings benefit from no policy recognition or protection in heritage terms.

87-89 ALDGATE HIGH STREET & PORTSOKEN HOUSE



The curved Italianate frontage of 87-89 Aldgate High Street (Credit: SAVE Britain's Heritage)

The handsome stucco edifice of **87-89 Aldgate High Street** echoes the scale and decorative design of the corresponding building at **No.1 Minories**. Described in Pevsner as being still '*undilutedly Italianate*' in style, the building is thought to be the work of D.A. Cobbett, and dates from 1860. The building comprises a generous central curved corner frontage, flanked by two symmetrical wings, all three characterised with stone coining, decorative architraves and a centrally placed venetian window on each elevation. The roofline is marked by pedimented dormers on all, set back against the single storey mansard roof.



The curved range of Portsoken House as seen from the north side of Aldgate High Street (Credit: SAVE Britain's Heritage)

Portsoken House forms the western corner of Minories and Aldgate High Street and is a building of high architectural significance and landmark quality. Portsoken House was completed in 1927-28 to designs by the renowned architect George Val Myer who also designed the grade II* listed BBC Broadcasting House on Portland Place (1932), and the landmark Alford House on Park Lane in Mayfair (1930-32). When Portsoken House was completed it was reputed to be the tallest office building in the City of London. This tall stone faced building is characterised by rich classical detailing and strong horizontal bands of windows which add to the street presence and the building which is currently used for offices.

Nos. 6-12 Minories comprises a row of 4 unlisted Victorian commercial buildings built in 1891-93. Pevsner notes the unusually ornate detailing, including corbelled out 2nd floor balconies, denoting their historic use facing onto the street. Busts of lions and floral consoles are particular features of architectural note. Historic maps indicate the buildings were used to house manufacturing businesses in latter 19th and early 20th centuries', perhaps explaining their decorative public facades.

These buildings look to be in average to poor condition, with clear signs of neglect on the upper storeys. They nonetheless make a clear and positive contribution to the street scene and we consider them to be coherent additions to the conservation area, relating in both period, use and style to the surviving Victorian terrace moving south from Aldgate High Street.



The four adjoining Victorian buildings at Nos. 6-12 Minories are attractive contributors to the architectural character of the area, but remain unlisted (Credit: SAVE Britain's Heritage)

ALDGATE & JEWRY STREET

Aldgate Pump is a grade II listed Victorian water pump which stands at the junction where Aldgate meets Fenchurch Street and Leadenhall Street.

A well has been noted on this spot since the 13th century, with the current structure consisting of a tapering stone pier with brass dog's head spout and triangular pediment. The current pump is thought to be 18th century in origin and has come to be seen as the symbolic threshold of the East End of London. The pump is no longer in use for drawing water but is the only surviving historic fragment at this important visual junction of the conservation area which has otherwise undergone extensive rebuilding during the 20th century.

Right: The Aldgate Pump in 1847, with its original stone basin and ornate wrought iron lantern, both of which were removed in the early 20th century (Credit: Wikipedia Commons)

Below: Modern day view looking eastwards from the Aldgate Pump into the proposed Creechchurch Conservation Area and fellow listed landmarks including St Botolph without Aldgate (Credit: SAVE Britain's Heritage)



The Three Tuns Public House, 36 Jewry street

Evidence of a public houses on this site dates back to 1747, with the present building erected in 1939 by the Charringtons Brewery. Fragments of the old Roman London Wall runs through the pub cellar and have been preserved behind a large Perspex panel. The pub forms a positive feature along the curving Jewry Street, its slightly lower scale creating a pleasant contrast between the two unlisted buildings either side.



The Three Tuns Public House, 36 Jewry street in 1941 and in 2023 (Credit: SAVE Britain's Heritage)

The Portal Trust & David Game College, 31 Jewry Street (formerly the Sir John Cass Institute)

This impressive row of interconnected buildings forms the eastern side of Jewry Street and comprises one grade II listed building built in 1898-1901 by A.W. Cooksey (who also designed the later Aldgate School of 1908 on Dukes Place which is at the heart of this proposed new conservation area) with its unlisted extension built in 1954 and designed by Verner Rees (1886-1966), who also designed Westmoreland County Hall in Kendal of 1939, Swansea University Library of 1937, the London School of Hygiene & Tropical Medicine in Bloomsbury of 1929.

The grade II listed portion of the building shares an important link to the existing area proposed for the conservation area being by the same architect as the Sir John Cass School (now Aldgate School). This building was however the first of the two to be established in this area under bequests made by Sir John Cass. Receiving a detailed entry in Pevsner, the building today remains a major landmark on Jewry Street and together with the adjoining buildings moving north towards Aldgate, forms a clear link with the school and by virtue the proposed conservation area boundary in all options under consideration.

A further connection with the conservation area as proposed is the preservation of further fragments of Roman Wall with the basements of the college.



View looking north up Jewry Street and long decorative frontage of the former Sir John Cass Institute (Credit: SAVE Britain's Heritage)



The northerly extension added to the Sir John Cass Institute in 1954 is an attractive landmark designed by Verner Rees (Credit: SAVE Britain's Heritage)

CONCLUSIONS

1. SAVE wishes to reiterate its support for Option 3 (as currently proposed for consultation) as the starting point for any proposed Creechurch Conservation Area, but with the extensions outlined above (Option 3 Plus) for inclusion in the final conservation area boundary put to Members of the Planning Committee.
2. Designation of the extensions proposed in Option 3 Plus would help guide coherent and sympathetic development in the wider area as a whole, with the ancient thoroughfare of Aldgate and Aldgate High Street – together with Aldgate Square – at the heart of the new conservation area.
3. This area of the City clearly possesses a high and varied degree of historic, architectural and evidential significance, which together generate a place of special interest deserving of recognition and protection. On this basis, we consider our proposed Option 3 Plus to fully meet the criteria set down for conservation area designation in The Planning (Listed Buildings and Conservation Areas) Act 1990.
4. We consider the extensions proposed by SAVE others to be fully justified in terms of the criteria set out in Historic England guidance for conservation area designation and the duties the City of London Corporation is beholden to under Section 69 of the Planning Act 1990.
5. These include clear and positive historical connections, architectural coherence and key shared characteristics including a consistent low-scale townscape and the interspersal of landmark civic buildings amongst unlisted but largely contemporaneous non-designated heritage assets which currently benefit from no statutory protection.
6. Conservation area boundaries should provide certainty. The boundaries proposed in our extended Option 3 Plus are logical and enforceable by design, demarking the conservation area clearly from its setting.
7. Should the City proceed to designate a new Creechurch Conservation Area, we also consider it essential that a Management Plan be created to accompany the Conservation Area Appraisal. In an area of high development pressure, clear guidance on the nature, scale and placement of new development will be key to the effective protection and enhancement of the conservation area as a planning consideration.
8. Further detail on the kinds of management policies which such a Management Plan might contain are set out in paragraph 9.03 of the Option 3 report prepared by Alec Forshaw and Esther Robinson Wild.

Ben Dewfield-Oakley

Conservation Officer, SAVE Britain's Heritage

24th October 2023

SAVE
BRITAIN'S HERITAGE

Front cover image: Aerial birds eye view from above Aldgate School looking over St Botolph without Aldgate church & the buildings along Aldgate High Street with Aldgate Square in the centre foreground (Credit: © Justin Kase Zninez)

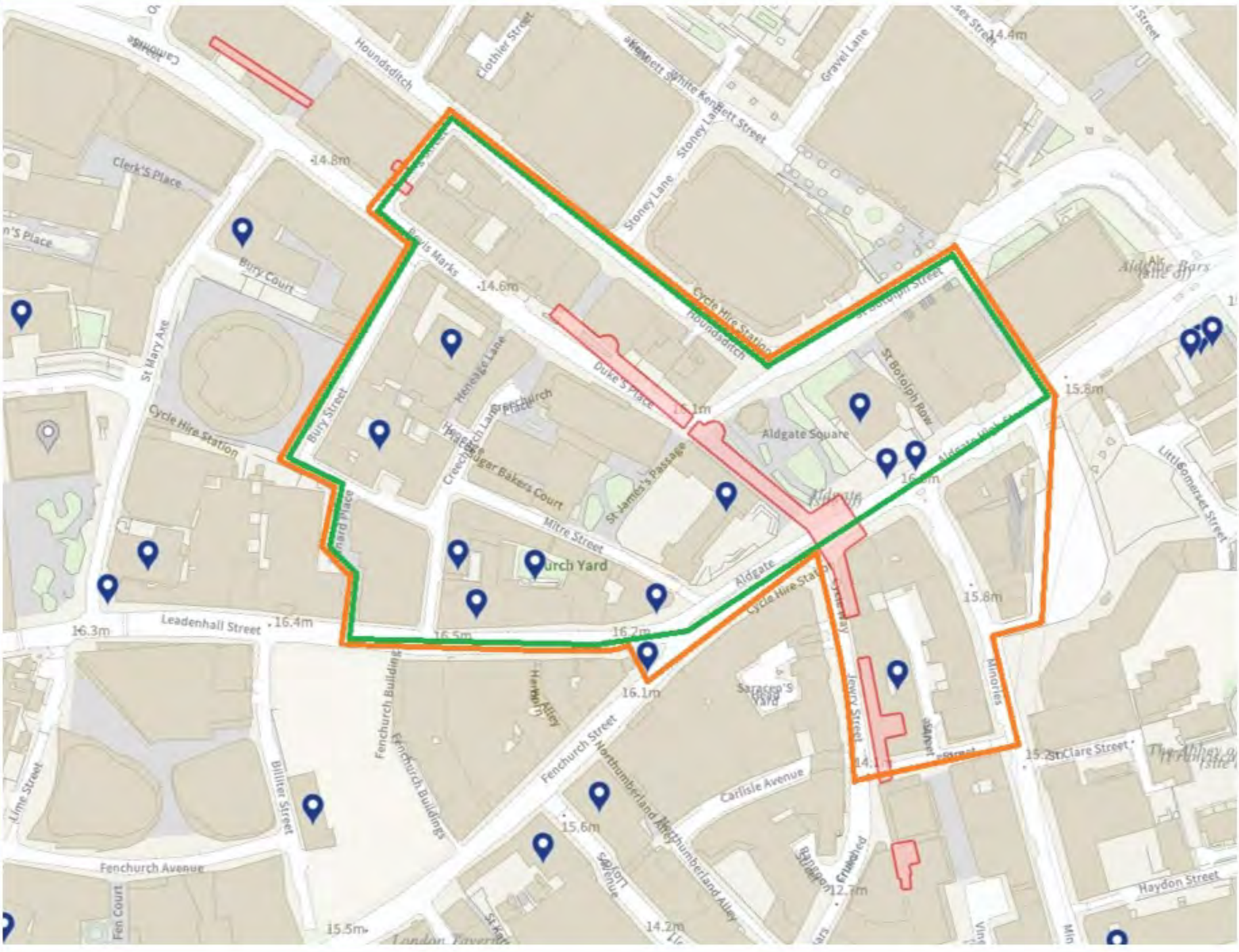
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Map showing the boundaries of Option 3 (as per consultation) and Option 3 Plus as proposed by SAVE Britain's Heritage (Map Base: Historic England)

Option 3 Boundary

Option 3 Plus Boundary

-  **Listed building**
-  **Remains of London's Roman Wall - Scheduled Ancient Monument**



Koukouthaki, Katerina

From: McNicol, Rob
Sent: 07 November 2023 09:35
To: Nancollas, Tom; Koukouthaki, Katerina
Subject: FW: Consultation Response to Proposed Creechurch Conservation Area
Attachments: Cover Letter_Consultation Response_S&P Sephardi Community.pdf; Detailed_Consultation Response_S&P Sephardi Community.pdf; Historical Considerations_Consultation Response (A Green)_S&P Sephardi Community.pdf; Protected Characteristics_Consultation Response (S Sackman)_S&P Sephardi Community.pdf



Rob McNicol | Assistant Director (planning policy and strategy)
Environment Department | City of London | Guildhall | London EC2V 7HH
[REDACTED]
[REDACTED] | www.cityoflondon.gov.uk

From: Tilla Crowne [REDACTED]
Sent: Monday, November 6, 2023 3:37 PM
To: McNicol, Rob [REDACTED]
Cc: Rabbi Shalom Morris [REDACTED]
Subject: Consultation Response to Proposed Creechurch Conservation Area

THIS IS AN EXTERNAL EMAIL

Dear Rob,

Please find attached our formal consultation response.

It includes

1. Cover Letter
2. Detailed Analysis
3. Historical Considerations
4. Protected Characteristics

Thank you for giving it your full consideration.

Best regards,

Tilla Crowne, Trustee, S&P Sephardi Community

TC



[Kal Nidre 5784 Appeal](#)

[We are grateful for your generosity which enables us to unite, succeed and prosper as a Kahal Please \[click here to donate\]\(#\).](#)

Thank you for your generous support.

Tilla Crowne
Trustee



a: 



Registered Charity no. 212517

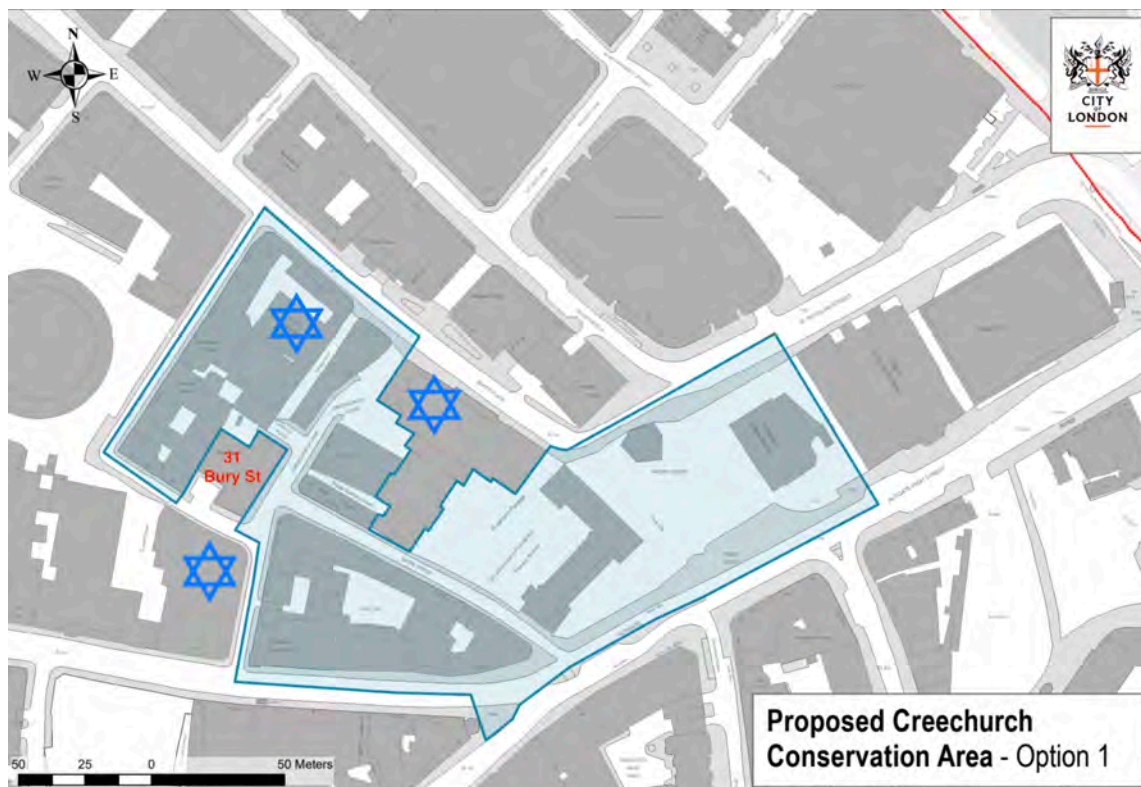
Dear Rob,

I am writing with our formal response to your consultation about the proposed Creechurch Conservation Area.

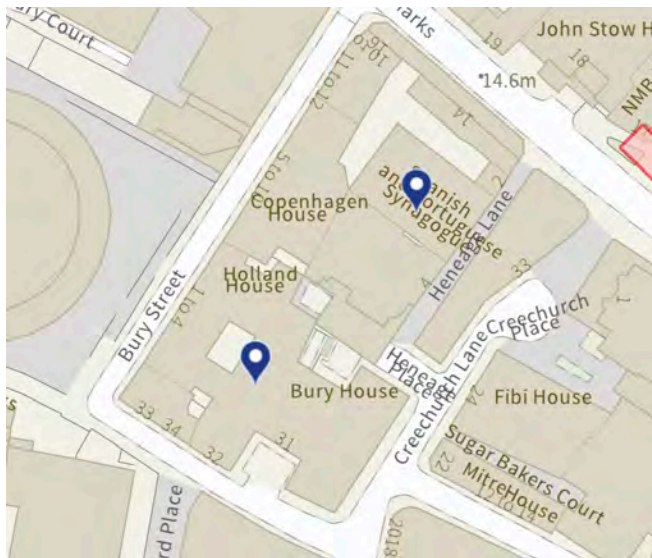
As you know, we are very supportive of the proposal in principle, and grateful to you and your colleagues for having put so much time and effort into getting things this far.

As you also know, we made a submission several months ago which proposed a boundary which you now refer to as Option 3. That submission was the product of detailed and scholarly work by two eminent experts, Alec Forshaw and Esther Robinson Wild.

We have thought hard about your Options 1 and 2, and we can see no justification for them. Both fail to embrace the coherent heritage of the Creechurch/Aldgate area, which has a very strong faith dimension - both Jewish and Christian. Furthermore - and this is I think a factor that has not so far been taken into account - they fail to reflect the fact that, in addition to Bevis Marks Synagogue, the immediate area contains the sites of two other very important synagogues (both of which are remembered through blue plaques). The juxtaposition of these three very important Jewish heritage sites is well illustrated here:



The exclusion of the site of 31 Bury Street from Option 1 is frankly nonsensical, and can only be motivated by considerations that have nothing to do with heritage and good planning. That site is occupied by a building which was purpose-designed as a complementary extension to the Grade 2* Listed Holland House, and which is not separately distinguished from Holland House on the Historic England Listing map:



It makes a marginally positive or at worst neutral contribution to the character of the area.

We are all only too well aware that this is a highly controversial site upon which the owners would like to build a tower that would cause enormous damage to Bevis Marks Synagogue and the area generally. If this site is excluded from the final Conservation Area boundary, the Corporation stands to be severely criticised for allowing its planning judgement to be over-ridden by improper considerations.

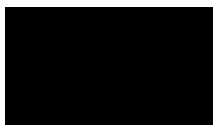
We now attach three further papers. One by Alec Forshaw, which responds in technical terms to the consultation; another by Abigail Green, which explains the history of the Great Synagogue and the Creenchurch Lane Synagogue, hitherto seemingly not taken into account; the last is from Sarah Sackman, and is a response to the consultation's questions 6/7 about protected characteristics. I am sure you will want to read them all carefully and take full account of their contents.

I am conscious there has been considerable public interest in the consultation, and that almost all respondents favour Option 3 (or in some cases an enlarged Option 3).

Whether you assess the consultation on the weight of public opinion or the weight of planning evidence, the outcome should be the same: there is everything to be said for Option 3 (with or without extension).

I look forward to seeing your Committee report shortly.

Best wishes,



Tilla Crowne, Trustee, S&P Sephardi Community

PROPOSED CREECHURCH CONSERVATION AREA

RESPONSE TO CITY OF LONDON PUBLIC CONSULTATION FROM BEVIS MARKS SYNAGOGUE - Alec Forshaw

INTRODUCTION AND SUMMARY

1. The London Sephardi Trust (the Trust) and the Spanish and Portuguese Sephardi Community (the Community) are the joint custodians of the Bevis Marks Synagogue. As a very long-established institution, in continuous occupation of its existing premises for over 300 years, the Trust and Community are grateful for the opportunity to contribute towards the future planning and well-being of this part of the City of London.
2. The following comments present their views on the various options that have been put forward for consultation concerning the potential designation of a new Conservation Area in the Creechurch/Bevis Marks area, and sincerely hope that these will be very carefully considered.
3. The proposal that a new Conservation Area be designated with the aim of conserving and enhancing the architectural and historic character and appearance of this part of the City of London is strongly welcomed in principle.
4. Nevertheless, it is essential that the boundaries of the new Conservation Area are drawn in a way that secures this objective. Regardless of the requirement to consider the setting of conservation areas and the heritage assets within them, the inclusion or exclusion of particular buildings or street blocks is extremely important and will have major implications for what is covered by conservation area policies and what is not. It is also particularly important that the historic significance of the area is carefully considered, not only the architectural merits of the existing buildings.

5. It is commonplace for buildings of neutral or negative value to be included within conservation areas. This is explicitly recognised in Paragraph 207 of the National Planning Policy Framework (NPPF) which states that “Not all elements of a Conservation Area or World Heritage Site will contribute to its significance.” Government advice under *Do Local Authorities Need to Review Conservation Areas?* is also clear: “A Conservation Area Appraisal can be used to help local planning authorities develop appropriate policies for local and neighbourhood plans. 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”.

It is entirely normal that a conservation area can contain negative features.

6. Paragraph 75 of Historic England’s Advice Note 1 (Second Edition) *Conservation Area Designation, Appraisal and Management* considers the issue of conservation area boundaries. It states 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”.

Paragraph 91 specifically deals with gap sites or negative contributors within a conservation area, and how detailed proposals for improvement can be made, again recognising that negative or neutral are to be expected in almost any conservation area.

7. Of the three options for the boundaries of a new Creechurch Conservation Area the Trust and Community are very strongly in favour of Option Three. It is considered that the boundaries proposed in Options One and Two are too small to effectively preserve and enhance the outstanding architectural and historical character and appearance of this part of the City of London.

LONDON'S HISTORIC JEWISH DISTRICT

8. The Trust and Community particularly wish to emphasise the very great historical importance of the area in terms of its pivotal role in the story of the Readmission of Jews to England from 1657, which is set out in detail in the Option Three proposal report. The area covered by Option Three includes three sites of great significance in London's Historic Jewish District. These comprise the site of the First Synagogue (1657 – 1701), the site of the Great Synagogue (1690 – 1941) and the Bevis Marks Synagogue, built in 1701. Combined with the underlying remains of the medieval Holy Trinity Priory and the two thriving Christian faith communities at St Katharine Cree and St Botolph Aldgate the historic and present-day spiritual presence in the area is of very high heritage significance.

9. It must be stressed that Annex 2 of NPPF states that the significance of a heritage asset (such as a designated conservation area) may comprise archaeological, architectural, artistic or historic interest. The fact that the First Synagogue and Great Synagogue, or indeed the Holy Trinity Priory and London Wall, have disappeared does not reduce the archaeological and historic importance of their sites.

NO.31 BURY STREET

10. The Trust and Community have a particularly strong objection to the omission in Option One of Bury House, No.31 Bury Street. The Trust and Community devoted a huge amount of time and resources to resisting proposals made in the planning application ref. 20/00848/FULEIA for a very tall building on this site. This application was refused by Planning Committee, against the advice of the planning officers. The Trust and Community are extremely concerned that the exclusion of No.31 Bury Street in Option One from a new Conservation Area is because City planning officers are already engaged in pre-application discussions with the owner/developer and their consultants for a revised redevelopment scheme. While this might be slightly reduced in height, it is likely nevertheless be potentially highly contentious, and raise the same issues

as were considered previously, including a catastrophic loss of daylight to the Synagogue.

11. The Trust and Community are strongly of the opinion that No.31 Bury Street fully justifies inclusion within a new Conservation Area. This is not only because of the proximity of the site to the Bevis Marks Synagogue, and the potential impact of any redevelopment of the site, but also because of the merits of the existing building at No.31 Bury Street.
12. During the consideration of the planning application for the demolition and replacement of the existing No.31 Bury Street virtually no attention was given to the merits of the existing building. Because it was not within a conservation area and had no designated heritage status, demolition was deemed completely uncontroversial. Everything centred around its replacement and the scale and impact of the proposed very tall tower.
13. It is considered that Bury House, No.31 Bury Street does possess merit in its own right. It was constructed in 1967 as an extension to the offices of Holland House which it immediately adjoins. Holland House, listed Grade II*, is a building of very high heritage significance, built in 1916 to the designs of the extrovert Dutch architect Hendrik Petrus Berlage. When Berlage fell out with his client, the wealthy Kröller-Müller shipping firm, the interior decoration of Holland House was completed by Henri van de Velde, his only work in the UK. Van de Velde was a pioneer of Art Nouveau, Modernism and first director of the Bauhaus, and the interiors of Holland House have no contemporary parallel in England.
14. The *Buildings of England: London 1: The City of London* by Simon Bradley and Nikolaus Pevsner describes No 31 Bury Street as an ‘undistinguished extension: Portland stone uprights carry on Berlage’s’. The architect was Gotch and Partners, a large commercial firm based in Pall Mall with branch offices in Glasgow, Brighton and Cardiff. Within the City of London they also designed No.5 Cheapside in 1971, the free-standing octagonal seven-storey structure near St Paul’s precinct which has recently been retrofitted.

15. While Pevsner's description may be modest and restrained, the Trust and Community disagree with the officer assessment in the Option One report that the architecture of No.31 is 'insipid and bland', or 'cannot lay claim to have any architectural or historic interest'. The verticality of the stone columns and the carefully modelled scale of five storeys plus two set-back floors admirably respect the massing of Holland House and are strongly positive elements. The set-back building line of No.31 on Bury Street provides an important well-proportioned forecourt for the eastern entrance of Holland House and an appropriate setting for the remarkable 'ship's prow' sculpture on the street corner.

16. No.31 Bury Street is clearly part of the historic development of the Holland House site. It is worth noting that the Historic England listing description of Holland House (Nos 1-4 and No.32 Bury Street) specifies "rear of premises rebuilt to greater height". This likely refers to the 1967 extension. The map accompanying the list entry also shows no property boundary between Nos. 31 and 32 Bury Street. There is no doubt that No.31 Bury is integral to the development of Holland House and its present-day setting.

- 17.No.31 Bury Street is also an integral part of a complete street block, all of which is included in Option One except for No.31. Its omission makes no sense. It should also be noted that service access to it from Heneage Lane passes over land that is owned by the Synagogue.

- 18.As well as directly abutting Holland House, No.31 Bury Street is surrounded by buildings of appropriate character and scale that are, or should be, included within the Conservation Area. These include the warehouses on Creechurch Lane and Mitre Street, and the northern elevations of Cunard House.

19. It should also be noted that Bury House is occupied and seemingly in good condition, with no indication that it is either obsolete or incapable of continued use.

20. The eastern elevation of No.31 Bury Street is an important component of the view down Mitre Street (illustrated in Figure 3 on Page 16 of the Option One report).

CUNARD HOUSE

21. On the south side of Bury Street, the Trust and Community consider that Cunard House should be included in the Conservation Area. Its east and north-facing brick elevations fronting Creechurch Lane and Bury Street are sensitively scaled and detailed to respect and reflect the warehouses on the east side of Creechurch Lane and Holland House on the north side of Bury Street. Its elevation to Leadenhall Street is grander and stone clad, but stylistically reflects the fine 1930s Art Deco Cunard Building which previous stood on the site, both in terms of design and materials, reusing some of the motifs and decorations from the previous building. It also carefully retains Cunard Passage which would form a logical boundary for a new Conservation Area. Cunard House is an important component in the setting of St Katharine Cree Church, but also for the Bevis Marks Synagogue.
22. Even more importantly Cunard House occupies the site of the first synagogue built after the Readmission of Jews to England in 1657, commemorated by a plaque on the corner of Creechurch Lane and Bury Street. The site of the Creechurch Lane Synagogue is of very high historic significance, and an important component in telling the story of London's historic Jewish District.
23. It is noted that both Options One and Two propose the inclusion within a new Conservation Area of the historic pump sited on the pavement at the acute junction of Leadenhall Street and Fenchurch Street. This structure is statutorily listed and under the ownership and control of the City Corporation and contributes to the local historic and architectural townscape. The Trust and Community would support its inclusion also within Option Three.

DUKES PLACE AND HOUNDSDITCH

24. The Trust and Community also consider that the collection of buildings on the north side of Bevis Marks, and south side of Houndsditch, between Goring Street and Aldgate Square, are important in terms of protecting the setting of the Synagogue and St Botolph's church. While there is a mixture of architectural designs and styles, all from the 20th century, there is a consistency of scale and grain of comparatively small plot sizes which continue that south of Bevis Marks and contribute a positively to the character and appearance of the area. Some of the buildings have particular merit, notably No.30 Duke's Place (Irongate House), No.40 Duke's Place (Greenly House) No.17 Bevis Marks (Creechurch House), No.24 Bevis Marks on the corner with Goring Street, and Nos 40-41 Houndsditch. Creechurch Lane runs north of Bevis Marks to join Houndsditch, flanked by the good elevations of No.17 Bevis Marks and No.40 Duke's Place. It is logical to include the whole of Creechurch Lane within the new Conservation Area.

25. Furthermore, the course and likely fabric of the Roman Wall runs beneath much of this block, reflected in it being a Scheduled Ancient Monument. This part of the area is of very high historic significance. The Hebrew name for the Bevis Marks Synagogue means 'Gate of Heaven'. This is quite probably a reference to its historic location just inside the City walls and close to the ancient gateway of Aldgate.

26. The Trust and Community consider that the existing scale and grain of the street block bordered by Houndsditch, Duke's Place, Bevis Marks and Goring Street must be conserved, including opportunities for enhancement, in order to protect the setting and context of the Synagogue and St Botolph's Church.

ONE CREECHURCH PLACE

27. It is agreed by all that One Creechurch Place has a very negative architectural and townscape impact on the area. The circumstances of its

comparatively recent approval and development, regardless of what was there before, are disappointing. It is omitted from Options One and Two. However, the site of One Creechurch Place is also important in the story of Anglo-Jewish heritage, as it was the site of the Great Synagogue in Duke's Place which stood from 1690 until its destruction in 1941. A plaque on Duke's Place records this. Option Three rightly includes One Creechurch Place because of its historic importance and its contribution to the London Historic Jewish District. Rather than having a 'hole' within the designated area, it can be made clear within the Conservation Area designation and the subsequent Policy Guidelines for preservation and enhancement that the existing building is a negative feature, alongside identifying opportunities for improvement. Given the pace of change within the City, with buildings only 25-30 years old being replaced, there may be future scope for considerable improvement in the context of appropriate policies for preserving and enhancing the character and appearance of the Conservation Area.

CONCLUSION

28. On a positive note, the Trust and Community very much welcome the general comments in Section 2.3 of the officers' report. This recognises that the three long-established places of worship and faith communities, the school, the residential uses, the pubs and restaurants and the communal open spaces give the area a very different character compared with the concentrated office uses of the nearby commercial cluster. The Trust and Community believe that a new Option Three Conservation Area will help not only to protect this existing character but could serve to promote further mixed uses within the area, including more residential occupation, educational uses and promoting more visitors and leisure activities. The inclusion of the larger area proposed in Option Three will increase the scope for the diversification of uses within the area. There is an opportunity here to nurture and enhance a strong and vibrant local community which will make this a distinct and flourishing quarter within the City of London. The Trust and Community urge the City Corporation to adopt Option Three.

OCTOBER 2023



PROPOSED CREECHURCH CONSERVATION AREA

1. I am Professor of Modern European History at the University of Oxford, with a particular interest in British Jewish history and heritage, and extensive experience working with national and international heritage organisations like Historic England, the National Trust, and the European Association for the Preservation and Promotion of Jewish Culture and Heritage. It is in this capacity that I have been asked to produce a report on the Jewish history and heritage of the proposed Creechurch Conservation Area.
2. Jews, and particularly Sephardi Jews, played a critical part in the history of the City of London and in London's role as a global financial and commercial centre at the heart of the British Empire for 300 years. This history is barely understood nowadays, and occupies no place in public memory or the British national narrative which overwhelmingly associates British Jews with the mass-immigration of eastern European Jews and the influx of refugees from Nazi Germany during the 1930s. It is a lost part of our national narrative, one that this initiative promises to help us preserve –perhaps even recover.
3. Beyond Bevis Marks, there is at present little trace of the historic Jewish presence in the City of London. Jewish cultural activity (the Jewish Museum, the Jewish Cultural Centre, the Ben-Uri Gallery) is located elsewhere, closer to current areas of Jewish residence, but unconnected to the deeper Anglo-Jewish past. Any Jewish heritage activity in the City and Whitechapel focuses on the East End and tells the story of its eastern European Jewish immigrants. But the history of Jews in the City was older and far more diverse than this suggests.
4. The Sephardic story – with its global and diasporic dimensions – has clear resonance today. Highlighting the longstanding presence of this little-known element of the British Jewish community underscores the plural nature of all minority groups: something often absent from the way they figure in public discourse, which tends to elide difference into block categories (British Jews/Muslims/Black British people). In tandem with the new heritage centre at Bevis Marks, this conservation area promises to address both the Jewish heritage deficit in the City of London itself, and its particular Sephardic dimensions. More than simply a line on a map, it defines and protects an area that has an intangible coherent force that is the product of its deep Jewish history and continued importance as a site of Jewish worship.
5. The 2003 English Heritage Outreach Strategy document confirms that reclaiming marginalised narratives, like this one, enhances social cohesion by promoting social and cultural understanding. Preserving this area and its Jewish heritage promises important benefits for social cohesion within the local area, and there is the potential to develop more Jewish heritage activity in this area, for example through Jewish heritage trails. In a time of rising antisemitism, Jewish groups and society in general will benefit. There may also be further social and cultural benefits, not just in relation to the management of Jewish heritage, but to the wider understanding and management of minority or marginalised heritages.
6. The Conservation Area Proposal rightly draws attention to the “*historic interest*” of this area, citing in particular “*enduring presence*” of the Jewish community in the area. (Para 4.10) And 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*” (para 4.12).

7. In that context, the Conservation Area Proposal highlights three key sites: the site of the Creechurch Lane synagogue (Para 4.12), of the Great Synagogue on Duke's Place (Para 4.13) and Grade 1 listed Bevis Marks (Para 4.14, 4.18). Only Bevis Marks survives, but all three sites are of great historic significance to the British Jewish community. Collectively, they comprise the City of London's Historic Jewish District, and tell the history of that community from the earliest years after the re-settlement to the present day.



8. Of the three Options now under consideration, Bevis Marks (left) is included in Options 1 and 2 but only Option 3 also includes the sites of the Creechurch Lane and Great Synagogues, although the draft Conservation Area Proposal rightly makes reference to all three. To protect Bevis Marks without conserving these other two sites and the historic hinterland they represent makes little sense: only when read together can the Jewish story of the City of London and the broader history of British Jews be properly understood.

9. Cunard House is the historic location of the 'Synagogue of the Resettlement' (1657-1701), otherwise known as Creechurch Lane Synagogue. As the first synagogue established in Britain after the expulsion of Jews from England by Edward I in 1290, this is a site of pre-eminent historical importance in British Jewish history. Here, Jews prayed when they were first permitted to worship openly by Oliver Cromwell in

1656. The synagogue was a three storey brick merchants house converted into synagogue in 1657. It was located at the limits of City of London because Jews as aliens were barred from owning any property or land freehold. Instead, Creechurch Lane properties were leased by the Jews from the church of St Katherine Free. In 1674 the synagogue was enlarged to accommodate 150 men and 80 women, who could assemble in the north and south galleries. It became one of the sights of 17th-century London. Samuel Pepys visited on the festival of Simchat Torah and wrote about it in his diary, in a celebrated passage that has become one of the most iconic descriptions of Jewish worship in early modern Europe. Princess Anne, too, visited before she became Queen. The current building's modest massing fits in comfortably with the rest of the Conservation area (including St Katherine Cree opposite it) making it appropriate for inclusion in it. A City of London Blue Plaque on the exterior of the current building marks the site where the Creechurch Lane Synagogue once stood. It is only included in Boundary Option 3.

10. The worshippers at this Creechurch Lane Synagogue went on to found the synagogues established at the other two key sites in this conservation area: Bevis Marks Synagogue (1701 - Sephardi) and the Great Synagogue (1690 - Ashkenazi). Pews, religious art, and ritual objects from this synagogue comprise part of the furniture and collection of Bevis Marks Synagogue today.
11. Grade 1 listed Bevis Marks Synagogue is the single most important historic site for British Jews. In the heart of the City, close to the Bank of England and the Mansion House, it speaks to their history since readmission, and to their status as the only significant Jewish community in Europe

with a continuous history of this kind. Designed by Joseph Avis, a Protestant architect who had worked for Christopher Wren, its history speaks to the close relations that existed between different faith communities in the City itself, and to the intimate connection of London's Sephardic community with its parent community in Amsterdam, which probably donated the central chandelier. This is now the oldest, continually-functioning synagogue in Europe. It remains a living religious community, which preserves a unique liturgy. It lies at the heart of the Sephardic diaspora, rendering it a site of global as well as local and national importance. It is unique in the way that British Jewish history is unique, because it did not experience the rupture of the Holocaust. Its courtyard-setting reflects the disabilities Jews experienced in this country even after the resettlement. As the only non-Christian religious site in the City of London it speaks powerfully to the historic diversity of the City over centuries. This is a site of exceptional - even unique - historical importance for London, the UK, Europe and the world.

12. 1 Creechurch Place is the historic location of the Great Synagogue, otherwise known as Duke's Place Synagogue, which existed on this spot for nearly three centuries from when it was founded in 1690, until it was destroyed in the Blitz in 1941. This synagogue is just off Creechurch Lane and again just east of City limits, where restrictions on Jewish landowning still prevailed. It was created partly in response to growing numbers of German, Dutch and Polish migrants after Glorious Revolution and accession of George I. In its early years the Great Synagogue enjoyed patronage of Abraham Franks and Benjamin Levy, the only two Ashkenazim of twelve 'Jew Brokers' permitted to trade on London stock exchange. Levy was an original subscriber to the Bank of England (one of six or seven Jews on the 1694 list) and also contributed generously to Bevis Marks. This is a site of great historic importance. The Great Synagogue was the origin-synagogue of the now-dominant Ashkenazi Jewish community, the seat of the Chief Rabbi, and the foundation place of the United Synagogue (the umbrella organization for mainstream Ashkenazi Judaism), and the London Beth Din (Jewish court) was also part of the Great Synagogue complex. It lies at



the heart of the history of diversity, equality and inclusion in Britain, because both Sir David Salomons and Lionel de Rothschild were members of this synagogue. These were the key protagonists in the campaign for Jewish emancipation, which was fought from and with the support of the City of London.

Salomons was the first Jewish Sheriff of the City (1835) and later the first Jewish Lord Mayor (1855, see left), while Rothschild was elected as one of the four MPs for the City of London in 1847 and fought for ten years for the right to take his seat in parliament – which he finally did in 1858. While the synagogue has not survived, some of its collections are now in the Jewish Museum London, which held an important exhibition in 1949 to commemorate this lost building and its community. Today, a commemorative plaque is affixed to the exterior of the current building marking its historic location. It is only included in Boundary Option 3.

13. The history of these three synagogues/sites is interconnected: they share the same origins; their members married each other with growing frequency; and they testify to the existence of an increasingly important Jewish community that lived within, and just outside, the boundaries of the City of London. Only when treated as a unity can this unique history be effectively preserved.

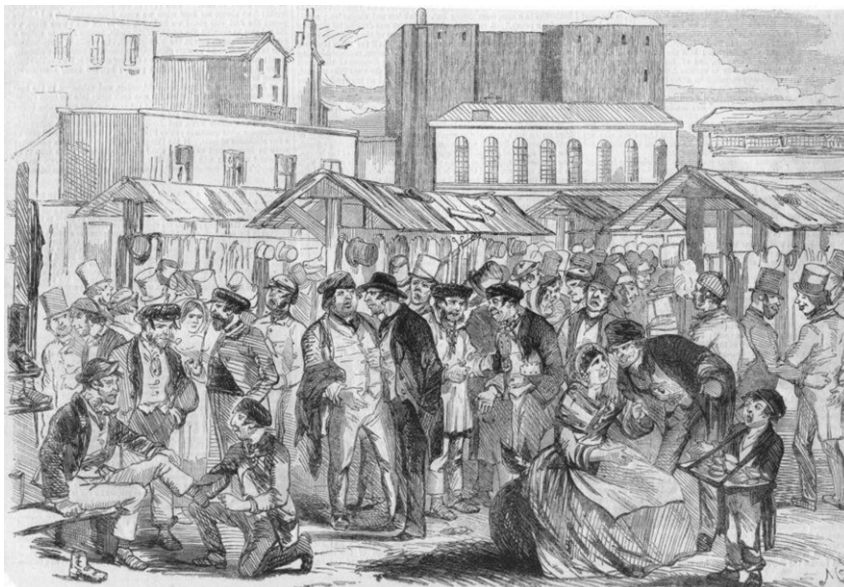
14. Synagogues never exist in isolation, but only ever in places where there is a significant local Jewish community. This reflects the requirement to pray with a group of at least 10 other Jewish men, and the prohibition on travelling except by foot on the Sabbath and other Jewish holy days. The narrow streets between these three sites, once home to Portuguese and Yiddish speakers, consequently speak to the broader history of Jewish lives lived here over centuries, and to what Historic England term its communal value, that is to say the connection of a people or community with this place over time (see *Historic England, Conservation Principles and Practice* 2015). A recently rediscovered map produced in 1876 shows that the area immediately surrounding Bevis Marks included Jewish infant schools, religious libraries for advanced Jewish learning, a kosher shop, a mikveh (ritual bath) and community offices. Name carvings on the exterior brickyard reflect that Jewish children once ran around these courtyards. Even today, as the Conservation Area Proposal notes, “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” (Para 4.17), of which Bevis Marks Synagogue is an important element.

15. There are other tangible traces of Jewish presence in this area. Located right by St. Botolph’s at the edge of the area delineated under Option 3, the Frederick David Mocatta Fountain on Aldgate Street (below) reflects the deep history of Sephardic Jews in this area. The Mocattas were among the very earliest Jewish families to settle in London after the readmission in 1656. This was London’s very first public drinking fountain. Decorated with a Star-of-David motif, it was installed in 1909 to honour the memory of the Jewish financier and communal leader, Frederick David Mocatta. The fountain was a huge benefit to all who lived and worked there.



The Mocattas were among the very earliest Jewish families to settle in London after the readmission in 1656. This was London’s very first public drinking fountain. Decorated with a Star-of-David motif, it was installed in 1909 to honour the memory of the Jewish financier and communal leader, Frederick David Mocatta. The fountain was a huge benefit to all who lived and worked there.

16. The interior of St. Botolphs Church, just inside the boundary of the area outlined in Option 3, also reflects the close relations between Jews and Christians in this area, as well as the important role of Jews in this area and the City of London more generally. From the time of Sir David Salmons onwards, many Jews represented Portsoken ward. Their names are faithfully recorded alongside those of other Portsoken Aldermen on a plaque in the entrance hall. The church itself features stained glass windows bearing the arms of several of London’s Jewish Lord Mayors, notably Marcus Samuel (1st Viscount Bearsted) who served 1902-3, Sir Bernard Waley-Cohen (1960-61), Lord Peter Levene (1998-99) and Sir Michael Bear (2010-2011).



17. The streets around Houndsditch, which forms one of the boundaries of Option 3, were traditionally a place of settlement for foreigners where non-freemen of the City were allowed to trade. The open street markets here (see left: Houndsditch Sunday Fair, 1855, showing the Great Synagogue behind), and in Petticoat Lane, were a vital lifeline for Jewish traders, especially those

active in the “rag trade” and the sale of old clothes, with which Jews were pre-eminently associated.

18. While many original buildings in this historic Jewish district no longer survive, the majority of 20th century buildings on the streets within the proposed conservation area have been “*designed to a height, scale and massing that is sympathetic with their neighbours*” (Conservation Area proposal, para 6.03). In this way, despite their destruction, something of the feel of the City’s historic Jewish quarter remains.
19. 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.*” (Conservation Area proposal, para 6.06). It is hoped that preserving the existing scale of the area will “*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.*” This is a particularly important consideration for Bevis Marks, due to its secluded courtyard location, and the relatively low light levels in the synagogue that have resulted from large-scale post-war development in the area. These pose a threat to the communal value of the synagogue, which is rooted in function as a place of worship and a place of reflection, spirituality and prayer. Importantly, the secluded courtyard, which is protected by law as part of the synagogue’s curtilage, also functions as an extension of the religious use of the synagogue: it too needs protection from further overshadowing and loss of direct light.
20. The building that currently stands at 1 Creechurch Place (former site of the Duke’s Place Synagogue) has already caused substantial harm to morning light levels in Bevis Marks. It is a good example of why the boundary for the Conservation Area needs to be more inclusive. It demonstrates how an inappropriate redevelopment with a tall building can harm the character and function of an entire neighbourhood. In this context, it is worth noting that a sympathetic redevelopment of this building might allow more light into the synagogue.

CONCLUSION

This area represents a unique heritage ensemble, speaking to the intimate connection of religious, civic and commercial institutions in the City of London, and evidence of the Jewish community’s centrality, in spatial terms, to the development of London as a financial capital. The proposed conservation area would be more than a line on a map. It defines an area that has an intangible coherent force that is the product of its deep Jewish history and continued importance as a site of Jewish worship. The proposal represents a very welcome opportunity to preserve, enhance and sustain this heritage, and to write British Jewish history more clearly into the national heritage narrative, something that is especially important at a time of rising antisemitism. If properly drawn by adopting Option 3, the proposed conservation area will also protect Bevis Marks Synagogue from becoming overshadowed, further destroying its historic setting and ability to function both as a communal centre and a place of worship. The Jewish – and specifically Sephardic – dimension of British history and its role in the evolution of the City of London will be better identified, understood, conserved and explained. More people, and a wider range of people, will have an opportunity to engage with Jewish heritage which, as outlined above, promises clear social and cultural benefits.

Abigail Green

Professor of Modern European History, University of Oxford
Tutorial Fellow in History, Brasenose College



Dear Sirs,

Re: Proposed Creechurch Conservation Area and Equalities Law

I am a barrister at Matrix chambers specialising in planning and equalities law. I am instructed by Bevis Marks Synagogue and the Spanish and Portuguese Synagogue to provide a legal opinion on the equalities impacts of the proposed conservation areas under the Equalities Act 2010.

I have reviewed the three options for the proposed Creechurch Conservation Area which are currently being consulted. These would variously affect the Grade I listed, Bevis Marks Synagogue and other sites of historic Jewish importance.

Option 1 is the City's initial assessment. Option 2 covers the same area with the addition of the building at 31 Bury Street. Option 3, which has been put forward by Bevis Marks Synagogue, includes the same area as Option 2 and takes in a wider area with the addition of the buildings to north of Bevis Marks/Duke's Place, 1 Creechurch Lane and Cunard House at 88 Leadenhall Street.

It is clear the proposals would particularly and disproportionately affect the Jewish community of Great Britain which worships at the Synagogue and for whom the Synagogue and surrounding Jewish sites hold incalculable religious and historic value. The City is bound to have due regard to those impacts.

In simple terms the wider the conservation area the greater the level of protection to the Jewish sites, particularly Bevis Marks Synagogue and its wider setting. Therefore, the option with the most positive impact on the Jewish community and its relations with other groups is Option 3.

Conversely, the alternative options (Options 1 and 2) offer far less protection to the Jewish sites. Indeed, any decision to exclude from the conservation area the sites of the former Creechurch Lane and Great Synagogues and the potential development site of 31 Bury Street would negatively impact the Jewish community. If these things

are not carefully considered and justified then that, in my view, would lead to an unlawful decision.

It is notable that both Options 1 and 2 exclude the sites of neighbouring historic synagogue sites, the Great Synagogue (1690-1941) and the Creechurch Lane synagogue (1657-1701), the first synagogue following the resettlement of the Jews in Britain in the 17th century. These sites have historic value to the Jewish community in and of themselves. Importantly, they also form part of the wider conservation setting of Bevis Marks Synagogue. For the reasons set out by the Synagogue's heritage consultants, only Option 3 offers the full degree of planning protection to the Bevis Marks Synagogue and its setting, as well as to these other Jewish historic sites, that a statutory conservation area entails. If this impact on the Jewish community and wider relations is not considered, that would be breach of the City's duties under the Equality Duty.

These Jewish sites, individually and collectively, are hold incalculable historic and spiritual value. Bevis Marks Synagogue is the oldest functioning synagogue in the UK. Its establishment some 300 years ago reflects the return of Britain's Jews to this country in the 17th century following their expulsion in the medieval period. The Synagogue and its immediate setting is of enormous historic, architectural and religious value not just to the regular worshippers at the Synagogue but to the entirety of Anglo-Jewry. The equalities impacts of any decision to exclude the neighbouring Jewish sites (as set out in Options 1 and 2) and the 31 Bury Street site (Option 1) which form part of Synagogue's setting from the conservation area boundary would affect all, or at least a very large number, of this protected group.

The Synagogue is the only protected non-Christian place of worship within the City. That would make the omission of the sites which form part of Option 3 inappropriate and would lead to differential treatment of these Jewish sites to other Christian sites.

Section 149(1) of the Equality Act 2010 requires a public authority to have due regard not just to the need to (a) eliminate discrimination but also to the need to (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and (c) foster good relations between persons who share a relevant protected characteristics and persons who do not share it.

The potential omission of the Synagogue's wider setting and the neighbouring Jewish historic sites from the proposed conservation areas (i.e. Options 1 and 2) has a poten-



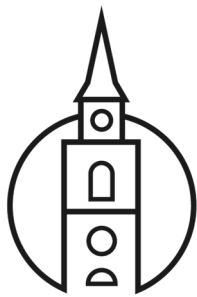
tially discriminatory, differential impact on Jews. Adopting Options 1 or 2 would also fail to take the opportunity to foster good relations between the Jewish community and other communities and residents within the City. If the City is minded to pursue either Option 1 or 2, it will need to justify such a decision having regard to s.149(1)(a) and (c). It is difficult to see what justification there could be for failing to provide these important Jewish sites with equal protection.

The City's Jews and other Jewish visitors to the Bevis Marks Synagogue have made and continue to make a unique cultural contribution to this part of London. As you will be aware, there was an unprecedented response from across the Jewish community (including the Spanish and Portuguese community, the Chief Rabbi of the United Synagogue, former Lord Mayors and other leading Jewish cultural figures) in opposition to the previous commercial office planning applications at 31 Bury Street and Creechurch Lane which were eventually refused or withdrawn. In that context, establishing the right boundary in equalities and planning terms for a conservation area represents a critical opportunity for the City to discharge its legal obligation under s.149(1)(a) and (c) and foster good relations between the Jewish community and other groups.

In conclusion, and in light of the above, I hope the City considers the matter carefully and that it adopts Option 3.

Yours sincerely,

Sarah Sackman



ST BOTOLPH
WITHOUT ALDGATE

From: The Reverend Laura Jørgensen
Rector of St Botolph without Aldgate

4 November 2023

Response to the City of London Corporation Consultation on a Creechurch Conservation Area on behalf of St Botolph without Aldgate

As the Rector, I write on behalf of the Parochial Church Council of St Botolph without Aldgate with Holy Trinity Minorities.

We are grateful to the City of London Corporation for proposing a conservation area that recognises that this area in the eastern part of the City of London has a long and varied history and acknowledges the part the Priory of Holy Trinity played in the medieval streetscape. Acknowledging and conserving the Jewish history of the area, and protecting its current expression is of vital importance.

Though this is framed as the Creechurch Conservation Area, the Jewish history associated with this area is fundamental to its importance. For this conservation area proposal to have significance, it needs to understand and protect the heritage of the Bevis Marks synagogue, being the UK's oldest synagogue, as well as the oldest continually-functioning synagogue in Europe. The architecture is important, but equally so is how the building lives in terms of its light, its worship, its community and its history. Simply drawing lines around buildings fails to understand them beyond cold stone and brick. The light from the spaces in between those demarcations, and the remembrance of what was and what has been lost is key to realising how the building is more than just the physical presence. The present vibrant Jewish community and its history is respected best by Option 3.

We make the following specific comments:

- Paragraph 3.3 of the Creechurch Conservation Area Proposal acknowledges that "Although upstanding remains of [Aldgate Priory] structures are not now visible in the townscape ..., the archaeological potential, placenames, forms and spaces (e.g. Aldgate, Mitre Street and Square, Creechurch Place, St Katherine Cree churchyard) they bequeathed convey a strong sense of special historic interest." This acknowledges that in defining the scope of a conservation area, the historic context of the land of the site (i.e. the area) is an important consideration and not just an individual judgement on the buildings that currently stand within the area. The extension of the area to incorporate spaces such as the Aldgate Pump, the Aldgate Square, and St Botolph's Church without Aldgate, which lie outside of the priory footprint, gives further support to this principle that the context of the area is just as important as current structures.

St Botolph without Aldgate, Aldgate High Street, London, EC3N 1AB

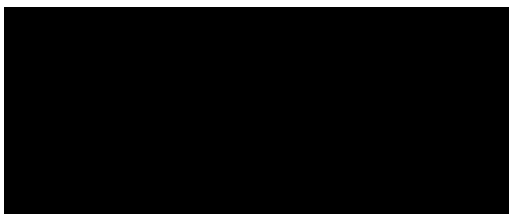
- The exclusion of (1) Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate, (2) No. 31 Bury Street, (3) One Creechurch Place, and (4) Cunard House, from the proposal is made on the basis of the above ground later buildings. However, this ignores the point, made immediately prior to this, that the special historic interest of this area lies in the footprint of the former priory and its environs.

The exclusion of the listed buildings is made more difficult to understand by the inclusion of other modern buildings on Creechurch Lane (No 33), Leadenhall Street (Nos 78-80), and Heneage Lane (No 4).

- The exclusion of the higher modern elevations is justified on the basis that they are unforgiving and not sympathetic in terms of scale and modelling. This impact and juxtaposition will nevertheless continue to exist and to be felt irrespective of whether these properties are included or excluded with the proposed area. As exclusion brings no benefit, these should also be included, justified on the basis (accepted within the proposal) that the site on which they stand is important in terms of defining the historic importance of the area. It is acknowledged that the construction of the current buildings may influence what will be built in their place in the future. However, again this holds true whether they are included or excluded within the proposal, and therefore is not a convincing argument for ignoring their footprint being an integral part of the priory site and part of what makes the area special.
- The exclusion of Cunard House (No 88 Leadenhall Street) should also be reconsidered on the basis of the context of what is being conserved in this proposed area. Page 25 of the proposal acknowledges the importance of this site in the context of the Jewish history of London, being the site of the first synagogue in England following the resettlement of 1656. Section 4.2 of the proposal states the importance in recognising with the proposed area, "Strong and continuing associations with the Jewish community following resettlement in the C17." Additionally, though the current building is modern, it was designed in order to sympathetically retain much of the previous building's Art Deco styling. Favouring the proposal excluding the four named properties may raise questions that the exclusions are based on current and future building plans that would further impact unsympathetically on what is intended to be achieved by this proposal, in terms of scale and modelling.

We are therefore supporting Option 3 of the consultation as the one which encompasses Holy Trinity Priory in its entirety the area around Bevis Marks Synagogue and St Botolph's church.

Yours sincerely,



St Botolph without Aldgate, Aldgate High Street, London, EC3N 1AB

THE VICTORIAN SOCIETY
The champion for Victorian and Edwardian architecture

PlanningPolicyConsultations@cityoflondon.gov.uk

Your reference: N/A
Our reference: 188239

15th November 2023

Dear Planning Team,

RE: Potential new conservation area, known as Creechurch Conservation Area

Thank you for consulting The Victorian Society on the proposal for the creation of a conservation area around Creechurch.

We are pleased that The City of London is considering designating the Creechurch Conservation Area in a part of the City where heritage has historically been under-designated.

We especially support the recognition that the City's report afforded to the contribution made by the warehouses at Creechurch Lane/Mitre Street to the general character of this area. However, while the tea warehouses on Creechurch Lane are Grade II listed, the distinctive Cree House, a former fruit dealer's premises distinguished by terracotta friezes and stone carvings of exotic fruits and flowers, currently has no protections. The designation of a conservation area would help to preserve unlisted commercial buildings like Cree House that augment the setting of heritage assets and bear witness to the commerce that was a major part of the area in the 19th century.

We also support the identification of the Bevis Marks synagogue and area around it as worthy of the protection a conservation area brings. While the fabric of the Bevis Marks' synagogue primarily dates to the late 17th and 18th centuries and is therefore outside of the Victorian Society's area of concern, the façade of the synagogue, its red brick and terracotta vestry and the iron lampposts visible on Heneage Lane date from the 19th century. Altogether, they make Heneage Lane into a charming passageway that gives a sense of the different phases of the synagogue and of its setting away from the main streets.

As England's oldest synagogue, Bevis Marks can also be said to derive significance from its associations with important figures across several centuries, including the

Patron
HHH The Duke of Gloucester KG, GCVO
President
Griff Rhys Jones
Chair
Professor Hilary Grainger

Vice Presidents
Sir David Cannadine
The Lord Howarth of Newport CBE
Sir Simon Jenkins

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19th; Bevis Marks was the place of worship of the family of Benjamin Disraeli, and was connected to Isaac D'Israeli's break with Judaism, meaning it is strongly connected to one of the most historically important figures in Victorian England. The synagogue also has clear communal value owing to its importance to London and England's Jewish community, both historically and in the present day.

As The City of London Corporation's proposal and the report of Esther Robinson Wild and Alex Forshaw has already identified and expounded the significance of several more 19th-century warehouses, houses, and Aldgate School, we will refrain from repeating the material here, but wish to express our full support for the inclusion of these buildings in Creechurch conservation area.

It has already been noted in other responses that Creechurch and its surrounds retain a low-rise character in comparison to the neighbouring areas of Whitechapel and Bishopsgate. The creation of the proposed conservation area would provide a buffer around the Creechurch area, ensuring that future development respects the historic character of the area and enhances the setting of the buildings discussed above.

In addition to approving of the designation of a new conservation area, we also wish to express a strong preference for the Option 3+ extension put forward by SAVE Britain's Heritage. There are a number of buildings in this extension that we consider worthy of inclusion in the conservation area, as they share characteristics with the buildings already identified in the City's own report and are also in a low-rise area. As the Option 3+ extension contains several Victorian and Edwardian buildings, we would like to offer the following comments on their significance and their complementary relationship to the buildings in the existing Creechurch Conservation Area proposals for your consideration.

The Significance of buildings within the Option 3+ Extension Aldgate Station

This station was first opened in 1876 as an extension of the Metropolitan Line, which was the world's first underground railway. It retains its 1876 trainshed, which has many original features such as its iron roof, arched brick walls and cast-iron columns with decorative spandrels. As such, this part of the station is a testament to the engineering achievements of the Victorian age and is of historical significance on this basis. The station's distinctive cream faience façade with Roman lettering dates from 1925-26, and has clear aesthetic value.

Aldgate Station shares many similarities with Farringdon, Paddington and Willesden Green Underground stations, in that all are Victorian stations that were rebuilt in a similar style by Charles W Clark. However, while these three stations are Grade II listed, Aldgate Station is not, and consequently has no protections.

Its inclusion in the Creechurch Conservation Area would broaden the type of buildings represented, and would also be a complimentary addition to many of the late 19th-century commercial buildings currently covered by the proposals.

73-78 Aldgate High Street

This terrace of mid-Victorian properties is rare survival in the Eastern part of the City. The buildings retain many original features and show a range of mid-Victorian styles. Nos. 73-75 have a handsome classical front of pilasters and a grand central pediment. No. 77 is particularly noteworthy for the stone detailing, its original arched sash windows and colourful painted band of guilloche decoration. No. 78 has likewise kept its original sash windows.

As such, they collectively have architectural interest and make a positive contribution to the streetscape. The fact that the terrace's 19th-century use was as shops and a pub means that these buildings would compliment the 19th-century warehouses identified in the existing proposals through providing a broader selection of 19th-century commercial buildings.

87-89 Aldgate High Street

87-89 Aldgate High Street sits one junction across from No. 1 Minories in the same position in relation to the street corner and it mirrors the curved form of No. 1, which makes a coherent and pleasing grouping. It is probably of a similar date to 73-78 Aldgate High Street, as Pevsner identifies it with a tender of 1860 issued by Moses & Sons Clothiers and names D.A. Cobbett as the likely architect.

The building is Italianate in style, and has many elaborate features such as the shell-shaped tympanums, ionic columns, Corinthian pilasters and ornately carved entablature separating the ground and first floor.

The grandeur of the building and the way in which No. 1 Minories responds to it adds interest to the streetscape. Its similar scale and date to the terrace at 73-78 Aldgate High Street also creates a positive visual relationship between the buildings.

Nos. 6-12 Minories

These buildings comprise of a row of adjoining late 19th-century buildings, all with identical facades. While the ground floor fronts have been completely replaced with modern shop fronts, the upper floors retain their intricate carvings, so that the row makes a positive contribution to the surrounding area.

These buildings are also unlisted, so inclusion in the conservation area would help retain the visual relationship between this and the terrace on Aldgate High Street/No.1 Minories.

The Former Sir John Cass Institute

The former technical institute was built 1898-1901 to the designs of A.W Cooksey. It is Grade II listed and is executed in a neo-Wren style. It would make an excellent addition to the conservation area, not only for its striking tower and impressive appearance, but also on account of the fact the same architect designed part of the Aldgate School in the same style as this building.

Aldgate and Jewry Street Pump

We support identification of the Grade II listed water pump as a suitable boundary for the conservation area. While this landmark has sadly lost its original 19th-century fixtures, it has been enhanced by the recent restoration work carried out by The City of London and Heritage of London Trust, which has seen the replacement of the iron pediment, handle, and brass wolf-headed tap, and installation of a plaque detailing the pump's history. Its association with a cholera outbreak in 1876 means it offers an insight into living conditions in the East End at this time and the background to later public health reforms.

As such, it anchors the modern surroundings in the history of the area and creates a relationship between this part of Aldgate and the historic buildings further along Aldgate High Street, making it an ideal gateway into the conservation area.

Conclusions

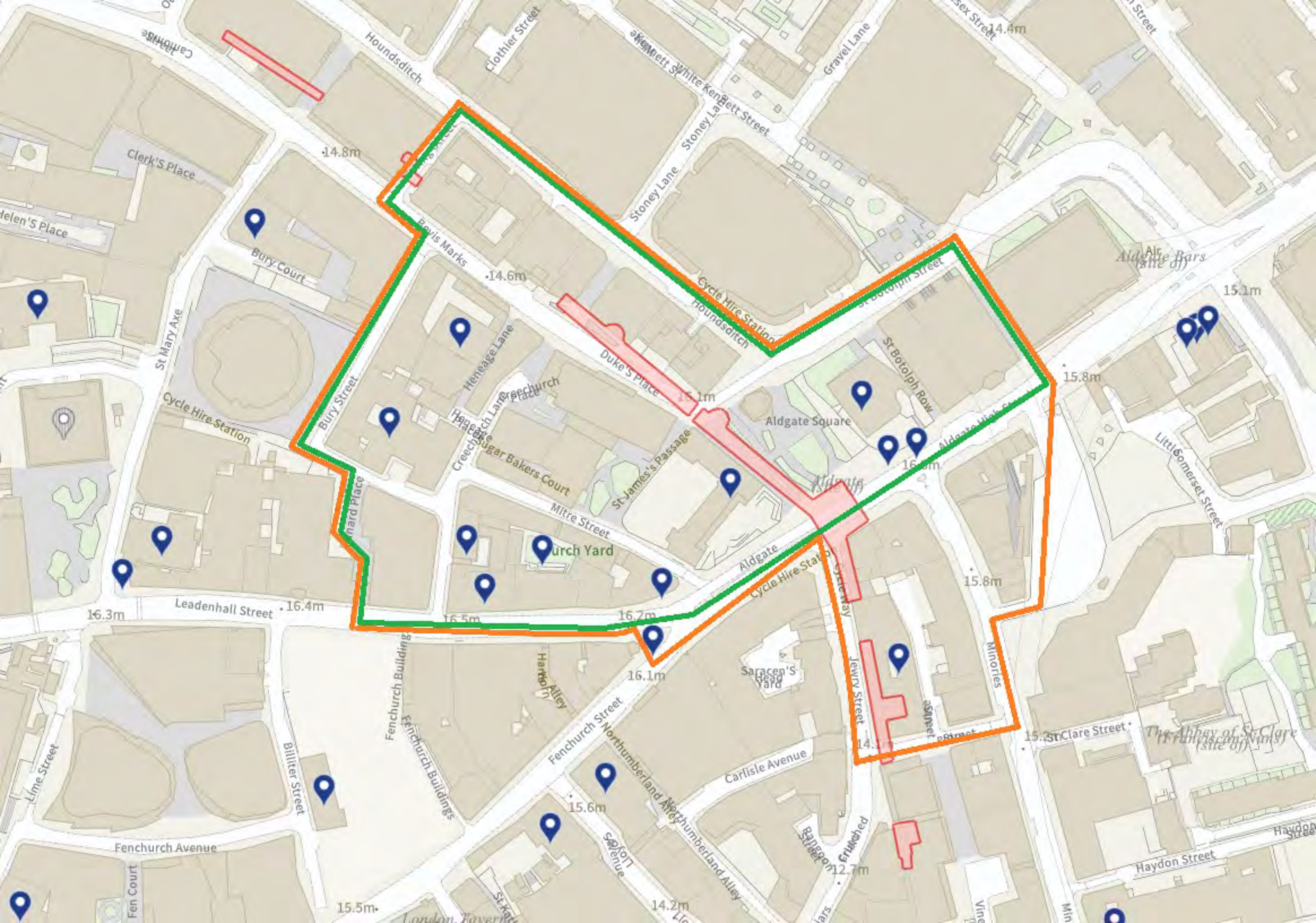
1. The Victorian Society completely supports the creation of the Creechurch Conservation area and the recognition of Bevis Marks synagogue and the 19th-century commercial warehouses as at the heart of this new area.
2. The designation of Creechurch Conservation area is important in ensuring this area retains its historic low-rise character, and would play a crucial role in guiding future development to ensure this character is respected and enhanced.
3. We strongly support the Option 3+ Extension put forward by SAVE Britain's Heritage. The proposed extension would see the inclusion of an important landmark in the form of Aldgate Pump, as well as several significant Victorian and Edwardian buildings that have both aesthetic value and further illustrate the communal and economic history of the area.
4. As many of these buildings are unlisted and therefore unprotected, we would like to advocate for the extension of the conservation area to ensure their historic and aesthetic character is retained. Several of the buildings in Option 3+ evidently compliment those within Options 1, 2 and 3, through their shared commercial character, low-rise nature, and, in one instance, even shared architect. We therefore think that Option 3+ would make a natural and positive addition to the conservation area.

I would be grateful if you could inform the Victorian Society of your decision in due course.

Yours sincerely,

Guy Newton

Conservation Adviser



Canton

Houndsditch

Clothier Street

Stoney Lane

White Kennett Street

Gravel Lane

14.4m

Clerk's Place

14.8m

14.6m

Stoney Lane

Stoney Lane

14.4m

Melen's Place

Bury Court

Boy's Marks

Stoney Lane

White Kennett Street

14.4m

Aldgate Bars (site of)

15.1m

St Mary Axe

Bury Street

Boy's Marks

Duke's Place

Cycle Hire Station

15.1m

15.8m

Cycle Hire Station

Bury Street

Heneage Lane

Duke's Place

Cycle Hire Station

15.1m

15.8m

St Mary Axe

Bury Street

Heneage Lane

Duke's Place

Cycle Hire Station

15.1m

15.8m

Cycle Hire Station

Bury Street

Heneage Lane

Duke's Place

Cycle Hire Station

15.1m

15.8m

St Mary Axe

Bury Street

Heneage Lane

Duke's Place

Cycle Hire Station

15.1m

15.8m

16.3m

Leadenhall Street

16.5m

16.7m

16.2m

16.5m

15.8m

16.4m

Leadenhall Street

16.5m

16.7m

16.2m

16.5m

15.8m

16.3m

Leadenhall Street

16.5m

16.7m

16.2m

16.5m

15.8m

16.4m

Leadenhall Street

16.5m

16.7m

16.2m

16.5m

15.8m

16.3m

Leadenhall Street

16.5m

16.7m

16.2m

16.5m

15.8m

16.4m

Leadenhall Street

16.5m

16.7m

16.2m

16.5m

15.8m

The proposed designation of the Creechurch Conservation Area

Consultation representations on behalf of WELPUT

6th November 2023

1.0 Introduction

- 1.1 These Representations are prepared by The Townscape Consultancy on behalf of WELPUT and have been made in response to the consultation on the proposed designation of the Creechurch Conservation Area. The Local Planning Authority (LPA) in this case is the City of London Corporation (hereby referred to as 'CoLC'). CoLC is currently consulting on boundary options for the Creechurch Conservation Area; Options 1, 2 and 3 or potentially Option 4, being a further boundary that consultees may propose.
- 1.2 WELPUT are the owners of two freeholds and one long leasehold in Option 1 and one additional freehold in Options 2 and 3. WELPUT is seeking to bring forward a new mixed-use development at 1-4 Bury Street (Holland House), 31 Bury Street (Bury House), and 33-34 Bury Street (Renown House), hereinafter called the 'Site'.
- 1.3 In principle, we are supportive of the overarching objectives of CoLC to formally designate a new conservation area in the Creechurch locality, based on the findings of the Creechurch Conservation Area Proposal prepared by CoLC in July 2023 in respect of Option 1, which provides an overarching summary of the area's special interest:

(i) Strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory, visible in the modern street pattern;

(ii) A characterful group of late C19/early C20 warehouses on Creechurch Lane/Mitre Street that are fine examples of their kind and survivors of a type now rare in the City;

(iii) Three places of worship of (in a City context) unusually diverse origins and of outstanding architectural and historic interest: Bevis Marks Synagogue (first purpose-built since resettlement and now oldest in UK), St Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church);

(iv) A proliferation of historic open spaces of diverse scales, functionality and appearance; and

(v) Strong and continuing associations with the Jewish community following resettlement in the C17.

- 1.4 We have carefully considered the potential boundary options presented as part of the consultation. Our conclusion is firmly in line with the proposal prepared by the CoLC, supporting Option 1.. The methodology and assessment conducted by CoLC officers aligns with due process and the conclusion is robust. The purpose of any thorough consultation is of course to consider all views to ensure that the best end result is obtained, but in this scenario we do not consider that Options 2 and 3 can be justified based on legitimate conservation requirements. Further detail is included within these Representations to explain our rationale behind this position.



2.0 Legislation, policy, and guidance on conservation areas

The LPA's statutory duty in respect of conservation area designation

Statutory provision

- 2.1 As defined in s69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the '1990 Act'), a conservation area is an area which has been designated because of its '*special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.*'
- 2.2 In discharging its powers under Section 69 of the Act, the LPA is bound to exercise its discretion reasonably, and to have due regard to the legislation, relevant policy and guidance.
- 2.3 The quality and interest of the whole area, as opposed to the individual buildings, should be the prime consideration in identifying conservation areas. The object, therefore, should not be to protect individual buildings or spaces which are not of demonstrable interest, nor if they do not contribute to the particular character of the conservation area.
- 2.4 For the purposes of these Representations we have not sought to provide commentary on the relative merit of the individual buildings proposed to be covered by the conservation area designation, except for the existing buildings at 1-4 Bury Street (Holland House), 31 Bury Street (Bury House), and 33-34 Bury Street (Renown House) which fall within the ownership of WELPUT and are the subject of emerging development proposals. While Holland House (Grade II listed) clearly contributes to the historic and architectural interest of the proposed Creechurch Conservation Area and Renown House has sufficient architectural merit to be included, 31 Bury Street is of no architectural or historic interest and blocks the historical Heneage Lane's access to Bury Street. 31 Bury Street is identified as a negative contributor even in the report supporting Option 3.

National policy and guidance on conservation areas

- 2.5 The National Planning Policy Framework (2023) sets out at paragraph 191 that:

When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest (our emphasis).

- 2.6 The policy is supported by the National Planning Policy Guidance ('PPG'). The PPG includes a section on the 'Historic Environment' which was last updated in July 2019.



2.7 At paragraph 024, the PPG states that:

Local planning authorities need to ensure that the area has sufficient special architectural or historic interest to justify its designation as a conservation area. Undertaking a conservation area appraisal may help a local planning authority to make this judgment.

Supplementary guidance prepared by Historic England

2.1 Historic England provides supplementary guidance on the purpose and methods of designating and assessing historic areas in its Advice Note on *Understanding Place: Historic Area Assessments* (April 2017). The guidance note sets out how Historic Area Assessments (HAAs) should be undertaken to understand and explain the heritage interest of an area. The note sets out that methods of HAA closely align with methods of Conservation Area Appraisal.

2.2 Under the 'Key Issues' to be considered the guidance states that '*appropriate boundaries*' should be established to keep Historic Area Assessments '*focused and manageable*' and that the relevance of such boundaries should be examined critically.

2.3 Historic England has prepared separate guidance in relation to conservation areas in *Advice Note 1: Conservation Area Designation, Appraisal and Management* (2nd Edition, February 2019).

2.4 At paragraph 11 the Advice Note sets out that the purpose of appraising an area for designation is to consider:

a) whether there is sufficient architectural or historic interest for the area to be considered 'special'?

b) whether this is experienced through its character or appearance?; and

c) whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help to solve.

Suitability for Designation

2.5 At paragraph 72, Advice Note 1 provides examples of the different types of special architectural and historic interest which could justify conservation area designation, including:

- areas with a high number of nationally or locally designated heritage assets and a variety of architectural styles and historic associations;

- *those linked to a particular individual, industry, custom or pastime with a particular local interest;*
- *where an earlier, historically significant, layout is visible in the modern street pattern;*
- *where a particular style of architecture or traditional building materials predominate; and*
- *areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest.*

Assessment of Special Interest

- 2.6 At paragraph 34 the guidance in Advice Note 1 sets out a number of key elements that may assist in defining the special interest of an area, including *‘the still-visible effects/impact of the area’s historic development on its plan form, townscape, character and architectural style and social/ historic associations and the importance of that history’.*
- 2.7 The guidance goes on to state at paragraph 43 that conservation area appraisals *‘should focus on setting out what makes the area special and the impact of its history on its current character and appearance.’*

Summary of policy and guidance

- 2.8 The purpose of designating or extending conservation areas is to preserve or enhance areas of *‘special architectural or historic interest’.* Therefore the designation or extension of a conservation area which is motivated principally by a desire to protect specific buildings would not ordinarily meet the statutory test.

The guidance in the NPPF and PPG emphasises the importance of ensuring that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. This is supported in the guidance produced by Historic England, in particular within Advice Note 1.

- 2.9 On account of the policy and guidance above, we consider that there must be some physical evidence, experienced visually and experientially through the character and appearance of the area’s buildings and spaces, to give rise to an area’s special architectural or historic interest. While there is

archaeological interest identified within the CoLC's appraisal (at Section 3.3) we consider that this in itself would not warrant the designation of a larger boundary where there is no visual or experiential association with the built form above. Equally, in instances where a City Corporation blue plaque is affixed to an unremarkable building to mark the former use of a particular site, this alone is not sufficient to demonstrate the level of special interest required to warrant its inclusion within a conservation area boundary.

- 2.10 It follows that the historic interest of a specific site or group of buildings is not sufficient if they do not contribute to the character and appearance of an area which is worth preserving and enhancing. Conservation areas therefore should not be designated with the purpose of creating a buffer for listed buildings (which already have statutory protection through the consideration of their setting and its contribution to heritage significance), nor to prevent redevelopment of buildings, as this runs contrary to legislation, policy and guidance.
- 2.11 Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 sets out that the LPA has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in exercising their planning functions. Conservation areas do not preclude development and there are many examples of new developments that come forward within conservation area boundaries that preserve or enhance their character and appearance.

3.0 Summary and significance of the Draft Creechurch Conservation Area

- 3.1 We have reviewed the Creechurch Conservation Area Proposal prepared by CoLC in July 2023, and the Proposed Bevis Marks/Creechurch Conservation Area document prepared by consultants for the Bevis Marks Synagogue (May 2022). The CoLC's Creechurch Conservation Area Proposal notes at 'Section 3.3 – Eligibility for Conservation Area Status' that:

'[...] the Creechurch locality is found to be richly historic, with a multi-layered sense of place stemming from the ancient delineation of the Roman and medieval City wall and Aldgate and the layout of the Holy Trinity Priory, foremost amongst the medieval City's monastic foundations, both of which have perceptibly influenced the modern street plan. Although upstanding remains of these structures are not now visible in the townscape (with the exception of the Grade II listed archway to the rear of nos. 39 and 40 Mitre Street), the archaeological potential, placenames, forms and spaces (e.g. Aldgate, Mitre Street and Square, Creechurch Place, St Katherine Cree churchyard) they bequeathed convey a strong sense of special historic interest.

Above ground, there is significant architectural interest in the streets and buildings subsequently developed from the early modern period onwards: the two City churches and Bevis Marks Synagogue offer outstanding examples of their types; Holland House strikes a pleasingly eclectic note; the Creechurch/Mitre Street warehouses are a rare and fine group of their kind. The locality is found to possess a varied, characterful and interesting group of historic buildings studded with highly significant historic places of worship and interspersed with more neutral modern buildings that help to create a consistent sense of townscape and distinctive sense of place.'

- 3.2 We consider that the significance of the listed buildings, individually and as a group, is considerable and along with the 19th century warehouse buildings and the historic remains of the Holy Trinity Priory at 77 Leadenhall Street, they should form the core of the new Creechurch Conservation Area. As such we agree that the area has sufficient architectural or historic interest to be considered 'special' and thus would warrant designation as a conservation area.
- 3.3 In particular, we agree with CoLC's own assessment of the significance of Holland House and Renown House, both of which are identified as making a positive contribution to the proposed conservation area.

4.0 The draft Creechurch Conservation Area and the City Cluster

- 4.1 The Creechurch Conservation Area Proposal notes at section 2.1 that the proposed conservation area is located in part of the City Cluster of tall buildings and as such *'It is notable, like the Leadenhall Market and St Helen's Conservation Areas, for being in amidst the high-rise modernity of the Cluster [...].'* It therefore follows that the taller immediate setting of the Creechurch Conservation Area plays a role in informing its heritage significance and this should be recognised as a characteristic of its special interest.
- 4.2 As with other conservation areas located in the City Cluster of tall buildings, the immediate and wider setting of the conservation area is extremely varied in terms of scale, form, and architectural character. Existing and emerging tall buildings such as 30 St Mary Axe and 100 Leadenhall Street are situated in close proximity to the proposed conservation area boundary.
- 4.3 At section 2.1, the Creechurch Conservation Area Proposal notes that *'[...] there is a strong defining juxtaposition between the area's historic buildings and the tall modern buildings.'*
- 4.4 We have carried out a full review of the conservation areas within the City of London, and in the City Cluster in particular. The Leadenhall Market Conservation Area Character Summary & Management Strategy SPD (2017) is a recent example of a conservation area appraisal which assesses the character of a conservation area, located within the City Cluster. The appraisal considers that presence of contrasting scales in the immediate setting of the conservation area results in *'[...] dramatic townscape views'* (CoLC's Leadenhall Market Conservation Area Character Summary & Management Strategy SPD, 2017, p.8), which are unique to this location. The taller immediate setting of the conservation area is therefore acknowledged as reflective of the continuous evolution of the City of London and, to some extent, is considered to highlight the conservation area's heritage importance by way of the clear contrast in scale between the historic and modern built form.
- 4.5 The St Helen's Place Conservation Area to the west of 30 St Mary Axe is also notable for its location in the City Cluster, albeit the published Character Summary precedes the development of many of the surrounding tall buildings. The St Helen's Conservation Area is tightly defined and, in similarity to the proposed Creechurch Conservation Area derives significance from its medieval layout of streets and alleyways and inclusion of nationally significant religious historic buildings. The immediate setting of the St Helen's Conservation Area comprises of existing and emerging tall buildings which provide a dramatic juxtaposition in scale and style to the historic buildings. Nowhere within the conservation area are tall buildings not perceptible to some degree, and as such they form an intrinsic element of the conservation area's character and a readily appreciable element of its setting.
- 4.6 Likewise, the setting of the Bank Conservation Area and the Bishopsgate Conservation Area, respectively, are highly varied, reflecting the overarching character of the City. Both conservation areas

border onto the City Cluster and as such they are characterised by a backdrop of tall buildings, which provide a strong contrast between old and new. In the case of the Bishopsgate Conservation Area, a tall building within its boundaries, One Bishopsgate Plaza at 80 Houndsditch, was recently completed in 2021.

4.7 In similarity to the conservation areas referred to above, we contend that the juxtaposition between the finer grain historic buildings and modern tall buildings is an underlying characteristic of the Creechurch locality and should be recognised as part of its special interest. There are a number of existing tall modern buildings and those under construction that form an appreciable element of the surrounding townscape including 70 St Mary Axe, 6 Bevis Marks, St Botolph Building, St Helen's Tower, 40 Leadenhall Street, 122 Leadenhall Street, One Creechurch Place and 30 St Mary Axe. In addition, there are other tall buildings within the vicinity of the proposed Creechurch Conservation Area that have been granted planning consent, including 100 Leadenhall Street and 24 Bevis Marks. Together the existing and emerging context of tall buildings forms part of the prevailing character of the area and informs its special interest.

4.8 The development of larger buildings in the vicinity of the Grade I listed Bevis Marks Synagogue has led to a change in the environment within which the listed building is appreciated. The Bevis Marks Synagogue clearly forms a legible enclave of highly significant historic buildings situated within a multi-layered and hyper-modern wider context of contrasting scales. Fundamentally, the contrast between old and new, insofar as it has not resulted in the loss of the historic network of alleyways and intimate spaces, has not harmed the setting of the Grade I listed Bevis Marks Synagogue, the contribution of which is principally derived from the intimacy of its courtyard from where the Synagogue building can be experienced beyond its façade on Heneage Lane.

5.0 Proposed boundaries for consultation

5.1 In this section we set out our review of the proposed boundary options for the Creechurch Conservation Area in line with Historic England's guidance and the statutory requirement at s69 of the 1990 Act.

5.2 CoLC is currently consulting on boundary options for the Creechurch Conservation Area. The boundary options are as follows:

- Option 1: CoLC's officers' preferred option, based on expert evidence and subject to an appraisal, dated July 2023;
- Option 2: Alternative option by CoLC proposed as a result of members' input into the suggested conservation area consultation. The proposed boundaries are the same as Option 1, with the addition of 31 Bury Street;
- Option 3: Alternative option proposed by Bevis Marks Synagogue. This option includes the same area as Option 2 with the addition of the buildings to the north of Bevis Marks/Duke's Place, 1 Creechurch Lane, and Cunard House at 88 Leadenhall Street; and
- Option 4: Any further alternative boundary as may be proposed by consultees.

Commentary on Option 1

5.3 Option 1 comprises CoLC's preferred option and is accompanied by the CoLC's Creechurch Conservation Area Proposal of July 2023. There are a number of listed buildings that are proposed to fall within the boundary, including;

- The Bevis Marks Synagogue (Grade I);
- The Church of St Botolph (Grade I) and associated iron gateway to the church yard (Grade II);
- The Church of St Katherine Cree (Grade I) and associated gateway in church yard (Grade II);
- Holland House (Grade II*);
- Sir John Cass School (Grade II*);
- Archway between numbers 39 and 40 Mitre Street and at rear of numbers 72 and 73 Leadenhall Street (Grade II); and
- 2-6 Creechurch Lane (Grade II)

5.4 The suggested boundary excludes a number of streets and individual buildings that are considered to depart from the qualities of the conservation area, including:

- Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate;
- Bury House, 31 Bury Street;
- One Creechurch Place, 26 Creechurch Lane and 1 Mitre Square; and



- Cunard House, 88 Leadenhall Street.

- 5.5 With regards to 31 Bury Street, the accompanying Creechurch Conservation Area Proposal appraisal notes at section 3.2 (p. 19) that the building *'[...] was a 1960s extension to Holland House which obliterated the historic James' Court immediately to the west and extinguished the southernmost section of Heneage Lane, which originally ran all the way from Bevis Marks to Bury Street. Of insipid and bland design, the building cannot lay claim to any architectural or historic interest; nor can it be said to be a good visual neighbour to its surroundings because of the way it crashes into the historic street pattern. Accordingly, the building is not considered to meet the criteria for inclusion in a conservation area.'*
- 5.6 In the same section, the appraisal also includes an assessment of the contribution of Holland House and Renown House to the conservation area's special interest. Holland House is described as the most prominent building on Bury Street, with *'[...] a very high quality of detailing and execution'*. Renown House is described as *'[...] a characterful survival of a small-scale early 20th century office building, once a common type in the City.'* Within the Proposed Conservation Area Appraisal, Renown House is considered to make a positive contribution to the conservation area.
- 5.7 We agree with CoLC's assessment of the relative significance of Holland House and Renown House and conclude, in agreement with CoLC, that there are no evident reasons for the inclusion of 31 Bury Street within the conservation area boundary. It is as it is of no architectural or historic interest and blocks the historical Heneage Lane's access to Bury Street and clearly does not meet the criteria for inclusion, in accordance with the requirements of statute and accompanying policy and guidance.
- 5.8 We note that the draft Creechurch Conservation Area Proposal document prepared by CoLC includes a Proposed Boundary Map for Option 1 at Figure 4.1. We contend that the proposed boundary as drawn does not appropriately reflect WELPUT's legal ownership for 31 Bury Street and, if it were to be adopted, it should be amended as shown in **Appendix 1** to these Representations.

Commentary on Option 2

- 5.9 Option 2 presents the same boundary as Option 1, with the inclusion of 31 Bury Street. We strongly contend that the inclusion of 31 Bury Street within the conservation area boundary is not supported with reasoned evidence within CoLC's own Conservation Area Proposal document. There is no contrary argument to suggest that the building is of any architectural or historic interest, nor does it contribute meaningfully to the special interest of the conservation area, as evidenced by CoLC's own assessment, which identifies the building as a negative contributor. Accordingly, the inclusion of 31 Bury Street would only serve to devalue the special architectural and historic interest of the neighbouring historic buildings arranged upon the medieval street plan, which is itself a principal characteristic supporting

the conservation area's designation, and was diminished when 31 Bury Street was built closing off Heneage Lane's access to Bury Street.

The inclusion of 31 Bury Street within the Creechurch Conservation Area would therefore not be supported by the eligibility criteria and would run contrary to paragraph 191 of the NPPF (2023), with CoLC failing in its duty to *'[...] ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'* If its inclusion is principally motivated by a desire to restrain the future development of the Site, this would be: (i) entirely inappropriate when considering the statutory criteria for conservation area designation; and (ii) ill-informed -

Commentary on Option 3

5.10 Option 3 is the boundary option proposed by Bevis Marks Synagogue. This option includes the same area as Option 2, with the addition of the buildings to the north of Bevis Marks/Duke's Place, 1 Creechurch Lane, and Cunard House at 88 Leadenhall Street. The Proposed Bevis Marks/Creechurch Conservation Area document, prepared on behalf of the Bevis Marks Synagogue, states at paragraph 1.02 that:

'[...] 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.'

5.11 We contend that the above is factually inaccurate, as the larger conservation area boundary proposed by the Bevis Marks Synagogue includes a number of existing and consented tall modern developments that, if designated, would form a defining characteristic of the conservation area's character and appearance.

5.12 The proposed boundary would include the existing 19-storey office development at One Creechurch Place. However, the Bevis Mark Synagogue's own appraisal notes that its *'[...] 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.'* Additionally, the conservation area boundary for Option 3 also includes the consented 19-storey building at 24 Bevis Marks (Bevis Marks House) which has been implemented. Together, the inclusion of these developments within the conservation area boundary proposed by the Bevis Marks Synagogue is unsubstantiated and appears to contradict the apparent low-rise scale of the Creechurch area referred to in the appraisal document.

5.13 It follows therefore that the Option 3 boundary is not intuitive and proposes to include existing and consented built form that does not contribute in a meaningful way to an appreciation and understanding of the proposed conservation area's special interest. The logic of including larger scale, or architecturally undistinguished buildings within the proposed boundary has not been identified within the accompanying appraisal document, and there is not sufficient evidence put forward to justify the designation of a larger boundary as the additional areas identified do not align with the area's special interest as set out in section 4.2 of the CoLC's appraisal.

5.14 In respect of townscape and views, the appraisal report states at paragraph 6.06 that:

'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.'

5.15 The listed buildings referred to above are highly graded, which affords them and their setting a high degree of protection as set out within legislation and the NPPF. Any development proposal that has the potential to impact the significance of the listed buildings and their settings would need to be duly considered as part of the planning process. We therefore strongly contend that the idea of including buildings with no architectural or historic interest within the boundary of the new conservation area with the purpose of creating a buffer against the City Cluster runs contrary to legislation, policy and guidance for the designation of conservation areas.

5.16 Notwithstanding the above, the Development Plan policies put forward by the City of London in its adopted Local Plan provide the principal planning consideration by which the CoL exercises its planning functions. In particular, there are a number of proposed new policies that relate to the Bevis Marks Synagogue in the version of the draft City Plan 2040 presented to the Local Plan sub-committee (October 2023).

5.17 Emerging Strategic Policy S21: City Cluster sets out that *'The City Cluster Key Area of Change will accommodate a significant growth in office floorspace and employment, including through the construction of new tall buildings, together with complementary land uses, transport, public realm and security enhancements, by;*

[...] 6. Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue. Developments should form a positive relationship with the Synagogue without dominating or detracting from its architectural and historic value; and ensuring that the historic elements of the Synagogue's setting are preserved and enhanced.'

- 5.18 Emerging Policy HE1: Managing Change to the Historic Environment sets out a number of criteria which, if adopted, would need to be met where development proposals affect heritage assets or their settings. The policy states at part 8 that:

'Development in the immediate setting of historic places of worship, including Bevis Marks Synagogue and St Paul's Cathedral, should conserve and enhance the elements that contribute to the significance of their setting.'

- 5.19 Once adopted, these Development Plan policies would need to be met as part of any planning application coming forward for determination.

- 5.20 We note that the appraisal prepared on behalf of the Bevis Marks Synagogue refers to 31 Bury Street as *'architecturally undistinguished but an appropriate scale for its highly significant neighbours.'* This implies that its scale provides the primary justification for its inclusion within the conservation area boundary, contrary to the purpose of the legislation and associated guidance. Our thorough review of other conservation areas within the City of London has determined that there is an established precedent within the City of designating conservation areas with tightly defined boundaries that, in many cases, exclude specific buildings within the wider urban block. This includes the Bank Conservation Area where 20 Gracechurch Street is excluded, and the Leadenhall Market Conservation Area where 70 Gracechurch Street is excluded.

6.0 Conclusions

- 6.1 This report has been prepared on behalf of WELPUT in response to the consultation on the proposed designation of the Creechurch Conservation Area by the City of London.
- 6.2 Overall, we are supportive in principle of the proposed designation of the Creechurch Conservation Area. This is on the basis that its location within the City Cluster, and the resulting juxtaposition of scales and architectural styles, is acknowledged as making an integral contribution to the area's special interest and should be recognised as such in any supporting documentation.
- 6.3 We reiterate that the proposed designation of any conservation area must be assessed against the statutory criteria. The quality and interest of the area as a whole, as opposed to individual buildings, should be the primary consideration in identifying conservation areas. While Holland House (Grade II listed) clearly contributes to the historic and architectural interest of the proposed Creechurch Conservation Area and Renown House has sufficient architectural merit to be included, 31 Bury Street is of no architectural or historic interest and blocks the historical Heneage Lane's access to Bury Street. 31 Bury Street is identified as a negative contributor even in the report supporting Option 3. On this basis, it is clear that 31 Bury Street would not meet the criteria for inclusion within the Creechurch Conservation Area boundary.
- 6.4 We submit that the proposed boundary Options 2 and 3 put forward as an alternative by CoLC members and the Bevis Marks Synagogue respectively would be inconsistent with the purpose of the legislation and would not substantiate a claim for '*special architectural or historic interest*' as required for designation under s69 of the 1990 Act.
- 6.5 It is our view that the City's preferred boundary as presented in Option 1 demonstrates the special interest required for the purposes of designation of the Creechurch Conservation Area. The designation of the conservation area on this basis is supported, subject to a minor adjustment to the boundary in relation to the freehold of 31 Bury Street, as explained in Appendix 1 to this Representations.

Appendix 1: Proposed revised boundary for Option 1 in relation to 31 Bury Street

1. The green line in Figure 1 shows the required reduction of the Option 1 boundary to omit the appropriate extent of WELPUT's freehold title NGL424600 for 31 Bury Street, for the purposes of the conservation area boundary.
2. Figure 2 is an amended map for the boundary of Option 1, reflecting the minor modification needed to address the abovementioned reduction in connection to the freehold of 31 Bury Street.



Figure 1: Option 1 boundary (outlined in blue) and extent of the area which relates to the freehold of 31 Bury Street (area bound by the green and blue lines). This area should be excluded from the conservation area boundary.

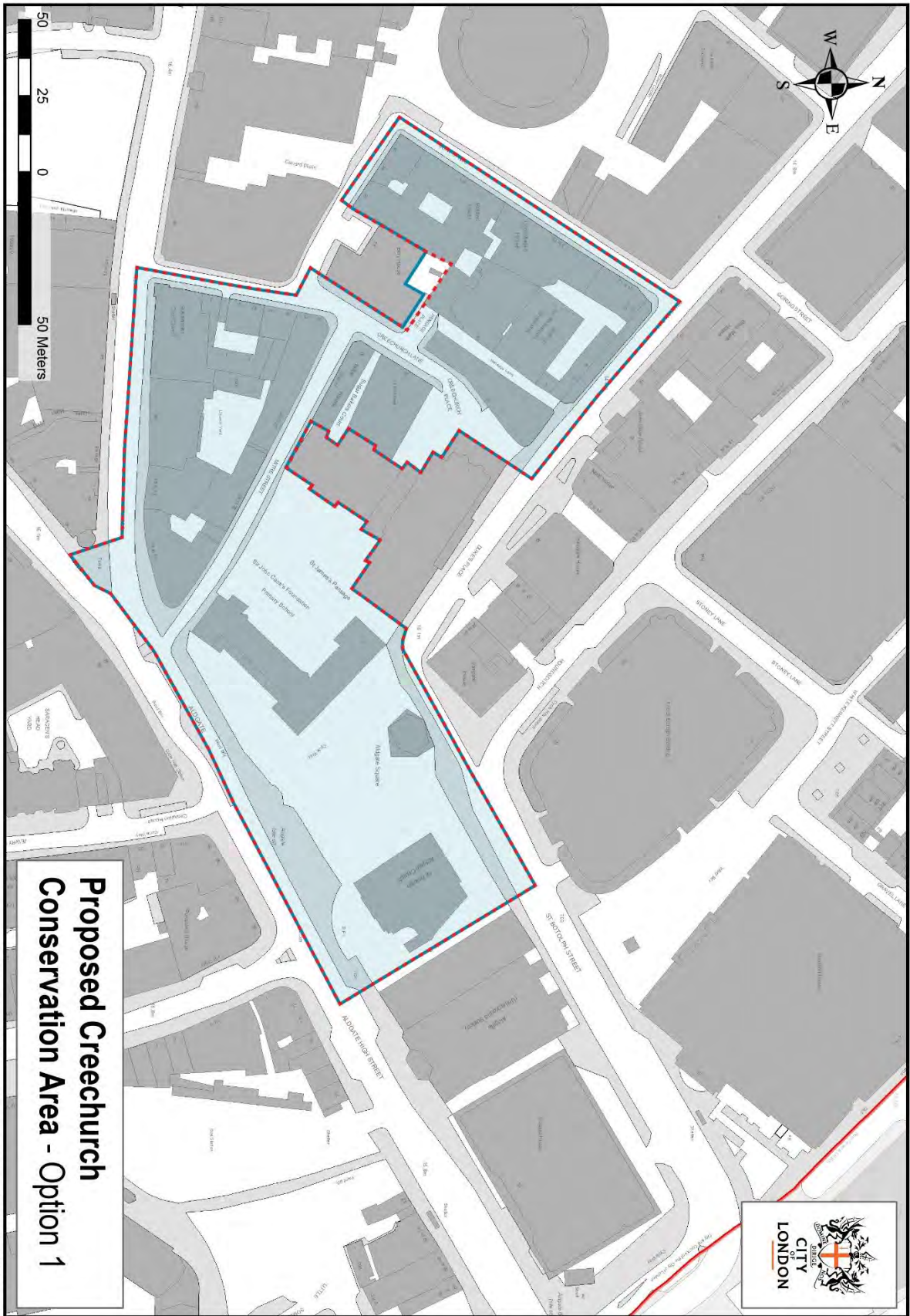


Figure 2: Proposed amended boundary for Option 1, with a minor reduction to account for WELPUT’s legal ownership of the freehold of 31 Bury Street.

Koukouthaki, Katerina

From: Peter Twemlow [REDACTED]
Sent: 06 November 2023 10:08
To: Koukouthaki, Katerina; Nancollas, Tom; McNicol, Rob
Cc: [REDACTED]
Subject: [REDACTED]

THIS IS AN EXTERNAL EMAIL

Dear all,

On behalf of our client, WELPUT, I am writing to confirm that we are due to submit representations to the Creechurch Conservation Area consultation today.

This will comprise DP9 providing responses to the 8 questions via the Commonplace platform, and The Townscape Consultancy (TTC) providing a more detailed representations document by email.

The DP9 answers are repeated below, as the online survey does not clearly provide an opportunity to set out who are they written on behalf of.

TTC will reply to this email later today, attaching the detailed representation.

1. **Do you agree that the Creechurch area should be designated as a conservation area?**

Yes.

2. **Which is your preferred option? If you don't like any of them you can offer an Option 4.**

Option 1 is supported, but with a minor change in the boundary around 31 Bury Street, as explained at Appendix 1 of the standalone Representations document submitted by email with this response.

3. **If you choose Option 4, please describe your preferred boundary.**

N/A

4. **Why do you think your selected area is of special architectural or historic interest?**

Please see the standalone Representations document submitted by email with this response.

5. **Please share any additional general information and facts about the area to support your choice.**

Please see the standalone Representations document submitted by email with this response.

6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? [Explanation of the Equality Act - Section 149 \(external link\)](#)

There will of course be people with various protected characteristics that live, work and/or worship within the area of the City that may become designated as a conservation area, but we do not consider that the boundary location (and whether certain buildings fall in or outside) should impact people with certain protected characteristics more or less than others. Development proposals within the Creechurch area (whether within, or outside, but in the setting of, a future conservation area) will need to be assessed in accordance with the development plan and the City of London will at that stage need to consider again its duty under the Equality Act 2010. Everyone has had equal access to the consultation materials and the ability to express their views for consideration, including in person events within the local area.

7. Please explain your answer to Question 6.

See answer to question 6.

8. Is there anything that could be done to mitigate any impacts identified?

N/A

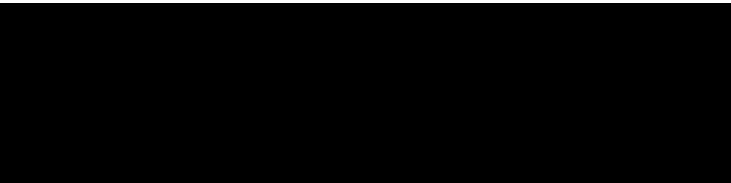
Kind regards,

Peter

Peter Twemlow



DP9 Ltd



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Koukouthaki, Katerina

From: Nancollas, Tom
Sent: 13 November 2023 18:36
To: Koukouthaki, Katerina; McNicol, Rob
Subject: FW: Re Creechurch Conservation Area

Importance: High

fyi



Tom Nancollas | Interim Assistant Director (Design)
Environment Department | City of London | Guildhall | London EC2V 7HH

www.cityoflondon.gov.uk

From: [REDACTED]
Sent: Monday, November 13, 2023 5:13 PM
To: Nancollas, Tom [REDACTED]
Cc: [REDACTED]
Subject: Re Creechurch Conservation Area
Importance: High

THIS IS AN EXTERNAL EMAIL

Dear Tom,

Our apologies if this has not come through. Please ignore my earlier e-mail - it went before I had finished it. Set out below are the questions asked of all CAAC Members and their responses:-

1. Do you agree that the Creechurch area should be designated as a conservation area? **Yes**
2. Which is your preferred option? If you don't like any of them you can offer an Option 4. **Option 3**
3. If you choose Option 4, please describe your preferred boundary. **N/A**
4. Why do you think your selected area is of special architectural or historic interest? **It contains a number of listed buildings, including three places of worship of the greatest importance and high quality commercial and public buildings of the late 19th and early 20th centuries. The area has a rich history set out in the assessment and benefits from open spaces, including the recently created Aldgate Square.**
5. Please share any additional general information and facts about the area to support your choice. **We believe that the more extensive area proposed in Option 3 includes some buildings of interest and will offer better protection to the buildings which form the core of the area in the light of the advice in the National Planning Policy Framework about the setting of historic assets.**
6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? Explanation of the Equality Act - Section 149. **Yes**
7. Please explain your answer to Question 6. **We believe that the proposal will show and enhance the City's respect for diversity, albeit in some cases (eg. the former Sir John Cass school) with appropriate explanation.**
8. Is there anything that could be done to mitigate any impacts identified? **A well-prepared Conservation Character Study and Management Strategy.**

Kind regards

Julie

Koukouthaki, Katerina

From: Harte, John
Sent: 29 September 2023 11:06
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area consultation

FYI

Kind regards



John Harte
Planning Officer | Policy & Strategy
City of London | Environment Department | Guildhall | London | EC2V 7HH

[REDACTED] | www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

From: John Schofield <[REDACTED]>
Sent: Friday, September 29, 2023 8:48 AM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
[REDACTED]
Subject: Creechurch Conservation Area consultation

THIS IS AN EXTERNAL EMAIL

Sir/madam

I am pleased to send you comments on the proposal for a Creechurch Conservation Area, put out for consultation.

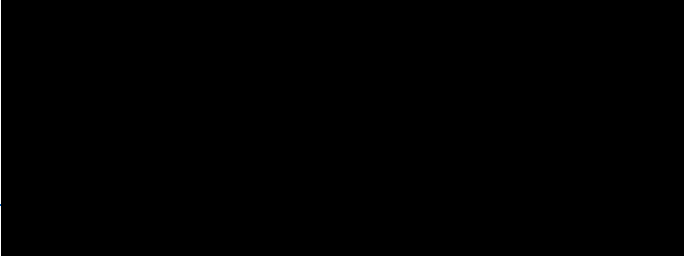
These are the views of the City of London Archaeological Trust (CoLAT: www.colat.org.uk).

We support Option 3 for the boundary of the proposed Area.

The text of the proposal document is missing some important elements. The authors do not appear to have consulted the major report on archaeological investigations of the entire area, J Schofield & R Lea *Holy Trinity Priory, Aldgate, City of London: an archaeological reconstruction and history* (MoLAS Monograph 24, 2005). This includes reporting on excavations ahead of the present building at 71 Leadenhall Street, which contains the medieval arch. The Listing does not include (perhaps because it was from 1972) another larger piece of medieval work: the lower walls of most of a chapel on the south transept of the priory church near the surviving arch. This had to be moved a short distance by crane in 1985 as it was on the site of the future lift shaft. This operation is described in the 2005 volume, pages 204-7, with photographs. Such a movement of a piece of a medieval building would be far less acceptable today. The chapel fragment was enclosed in a store room and access to it is difficult; it is not open to the public like the arch which is in a foyer. But the future of the chapel should be protected just like the arch. There may be other useful information about the heritage of the priory and its buildings in the monograph.

We look forward to the establishment of the Conservation Area.

Sincerely
John Schofield
Secretary, CoLAT



Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 10:24
To: Koukouthaki, Katerina
Subject: FW: Conservation area

FYI

Michelle

From: [REDACTED] <[REDACTED]>
Sent: Saturday, November 4, 2023 4:45 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Conservation area

THIS IS AN EXTERNAL EMAIL

Good Afternoon,
I was delighted to see this message from SAVE.
London is precious and unique. And so much has been lost forever. We must hang on to what is left.
Careful consultation has gone into this, it is thoroughly welcome news, and I hope other areas will follow.
Sincerely
[REDACTED]

NICKIE AIKEN MP
CITIES OF LONDON AND WESTMINSTER



HOUSE OF COMMONS
LONDON SW1A 0AA

Chris Hayward
Policy Chairman
City of London Corporation
Guildhall
London
EC2P 2EJ

30th October 2023

Dear Chris,

Creechurch Conservation Area Consultation

I welcome the decision by the City of London Corporation to create the Creechurch Conservation Area. I also welcome the opportunity for the public to have their say on the proposals through the consultation you have launched.

After discussions with Rabbi Shalom Morris of Bevis Marks, I am fully supportive of Option 3 outlined in the Corporation's consultation document. Option 3 would fully encompass Bevis Marks and the historic grade listed buildings surrounding the synagogue firmly within the conservation area, which includes a church and the only state school in the City of London.

I do not consider Option 1, which the City Corporation has recommended, as appropriate at all as it compromises the ability of the conservation area to fully protect the historic cultural assets in this area.

I would be delighted to meet with yourself and Rabbi Shalom Morris to discuss the proposed conservation area.

Yours sincerely,



Nickie Aiken MP
Cities of London and Westminster

Koukouthaki, Katerina

From: Pln - CC - Development Dc
Sent: 13 November 2023 11:13
To: Koukouthaki, Katerina
Subject: FW: '*Creechurch Conservation Area' (Incorporating Bevis Marks Synagogue).

Hi Kat,

Please see the email below regarding the proposed Creechurch Conservation Area.

Kind regards,

Davis

-----Original Message-----

From: [REDACTED]
Sent: Sunday, November 5, 2023 4:50 PM
To: Pln - CC - Development Dc [REDACTED]
Subject: '*Creechurch Conservation Area' (Incorporating Bevis Marks Synagogue).

THIS IS AN EXTERNAL EMAIL

Planning Department,
City of London Corporation.

Dear Sirs,

Following extensive research, it has come to my notice that the Corporation is consulting on a potential NEW Conservation Area.

You will know the history of not only the previous absurd planning application(s) to build a *tower block some c.3m to the east of Bevis Marks Synagogue but also which would have impinged upon what had been an existing conservation area incorporating *33 Creechurch Lane, London EC3A 5EB. The Synagogue would have been 'swamped'.

Furthermore, in May, 2022, there was STRONG objection to this *planning application and to another DETERMINING planning application for Bury House, 31 Bury Street, London EC3A 5AR for *33 Creechurch Lane, London EC3A 5EB.

You do not have to be reminded of the history attached to this location and to that of the City of London generally.

I read of a wonderful report drawn up for the Corporation outlining the incredible story of the City of London. This report was terribly interesting and showed the unique way in which the different original buildings had evolved.

Returning to the history of the actual Bevis Marks Synagogue, you will no doubt remember the IMPORTANCE to the Jewish Sephardi Community of this building. You do not have to be reminded that this is the oldest Sephardi (branch of Judaism) Synagogue in the United Kingdom but also the longest-serving regular serving services Synagogue in Europe.

I do hope the City of London Corporation will carry on with yet another new potential Con- servation area for *Creechurch Conservation Area.

Assuring you of my best interest(s) at all times, I remain

Yours faithfully,

[Redacted]

[Redacted]

Koukouthaki, Katerina

From: Harte, John
Sent: 02 October 2023 09:52
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area

FYI

Kind regards



John Harte
Planning Officer | Policy & Strategy
City of London | Environment Department | Guildhall | London | EC2V 7HH

[Redacted] | www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

From: [Redacted]
Sent: Friday, September 29, 2023 2:05 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Creechurch Conservation Area

THIS IS AN EXTERNAL EMAIL

1. Do you agree that the Creechurch area should be designated as a conservation area?
No, I do not believe that it is necessary to designate this area as a conservation area. The current rules and consultations in place are already sufficient to assess new planning applications. The planning process is already restrictive enough without imposing even more restrictions.
2. Which is your preferred option? If you don't like any of them you can offer an Option 4.
Preferred option is 1.
3. If you choose Option 4, please describe your preferred boundary.
N/A
4. Why do you think your selected area is of special architectural or historic interest?
There are buildings of interest in the area, but it is not a museum and should be open to change. This area is right by the Gherkin and other tall buildings in the Eastern cluster. Being a business centre is the main function of the area.
5. Please share any additional general information and facts about the area to support your choice.
Option 1 strikes the right balance between preserving buildings of interest and being open to progress.
6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? [Explanation of the Equality Act - Section 149 \(external link\)](#)
No

7. Please explain your answer to Question 6. N/a
8. Is there anything that could be done to mitigate any impacts identified? No

Best regards,

██████████

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 02 November 2023 13:52
To: Koukouthaki, Katerina
Cc: Planning Policy Consultations
Subject: FW: SAVE support

Sending over for your records.

Michelle

-----Original Message-----

From: [REDACTED]
Sent: Thursday, November 2, 2023 10:58 AM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: SAVE support

THIS IS AN EXTERNAL EMAIL

Dear sir,

I write to support the work of SAVE , and the heritage zone around the city of London. Please include Aldgate high street and the underground station.

Thank you,

[REDACTED]

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 02 November 2023 13:52
To: Koukouthaki, Katerina
Cc: Planning Policy Consultations
Subject: FW: SAVE support

Sending over for your records.

Michelle

-----Original Message-----

From: [REDACTED]
Sent: Thursday, November 2, 2023 10:58 AM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: SAVE support

THIS IS AN EXTERNAL EMAIL

Dear sir,

I write to support the work of SAVE , and the heritage zone around the city of London. Please include Aldgate high street and the underground station.

Thank you,

[REDACTED]

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 23:16
To: Koukouthaki, Katerina
Subject: FW: Creedchurch Conservation Area consultation

From: J <[REDACTED]>
Sent: Monday, November 6, 2023 4:32 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Creedchurch Conservation Area consultation

THIS IS AN EXTERNAL EMAIL

I would like to comment on the above.

I would like to support the plan described in option 3 (that put together by Bevis Marks)

The reason for my choice is that it provides the greatest protection and wider area covering. I feel of special interest at the listed Tea warehouses and the Synagogue.

Thank you.

[REDACTED]

[REDACTED]

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 23:15
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area consultation

From: [REDACTED]
Sent: Monday, November 6, 2023 8:53 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Creechurch Conservation Area consultation

THIS IS AN EXTERNAL EMAIL

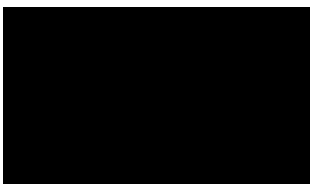
Dear Planning Policy team

I'm a resident of The City in Tower Ward. I'm commenting on the proposed Creechurch Conservation Area

To answer your questions:

1. Do you agree that the Creechurch area should be designated as a conservation area? **Yes, definitely**
2. Which is your preferred option? If you don't like any of them you can offer an Option 4. **Option 3**
3. If you choose Option 4, please describe your preferred boundary.
4. Why do you think your selected area is of special architectural or historic interest? **It's a beautiful old part of The City, full of nooks and crannies, with gorgeous warehouses and other buildings. Once it's gone, it's gone for ever, yet it is these buildings that attract visitors and residents into The City. Importantly, option 3 affords the greatest protection to the tea warehouses and synagogue.**
5. Please share any additional general information and facts about the area to support your choice.
6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? [Explanation of the Equality Act - Section 149 \(external link\)](#) **No A daft question**
7. Please explain your answer to Question 6.
8. Is there anything that could be done to mitigate any impacts identified? **No**

Many thanks and best wishes



Koukouthaki, Katerina

From: Harte, John
Sent: 05 October 2023 11:07
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area Consultation

FYI

Kind regards



John Harte
Planning Officer | Policy & Strategy
City of London | Environment Department | Guildhall | London | EC2V 7HH

[Redacted] | www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

From: [Redacted]
Sent: Wednesday, October 4, 2023 3:45 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Cc: [Redacted]
Subject: Creechurch Conservation Area Consultation

THIS IS AN EXTERNAL EMAIL



**Historic
Buildings**

London and Middlesex Archaeological Society

Sir,

I write as representative for the London and Middlesex Archaeological Trust Historic Buildings Committee who have reviewed the proposed options for the creation of a new Creechurch conservation area.

It is important that the City of London Corporation should ensure that all possible steps are taken to safeguard the protection of heritage assets in the City of London. In a response to planning application No. 20/00848/FULEIA for the rebuilding of Bury House at 31 Bury Street, Historic England advised that the construction of new tall buildings in the proposed conservation area "will cause considerable harm to the setting and significance of the Grade I listed Bevis Marks Synagogue and as such, they do not meet the planning requirements". The adoption of option 3 is the only option that would provide full protection to this important national heritage asset. Option 3 would also ensure the protection of a key section of the Roman wall, a scheduled monument, a number of Grade I, II* and II statutorily listed buildings which are of outstanding and exceptional heritage significance, and also important non-designated heritage assets for which at present there is no special protection.

The LAMAS HBCC therefore consider that the only way to provide full protection to this important area of the City of London is the establishment of a conservation area as outlined in option 3

Kind Regards
Stephen Gill

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 07 November 2023 13:48
To: Koukouthaki, Katerina
Subject: FW:

One more...

From: [REDACTED]
Sent: Tuesday, November 7, 2023 12:53 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject:

THIS IS AN EXTERNAL EMAIL

Hi There, Apologies I'm a day late. I've only just seen the online docs for the Creechurch Conservation Area Consultation. I'd like to support Option 3 if I may. My details, are as follows

Marcos Duroe

[REDACTED]

(We are on the corner of minories and portsoken street, so may be in the Corporations systems a [REDACTED]
[REDACTED] - It's the same address)

Many thanks,

[REDACTED]

[REDACTED]

[REDACTED]

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 23:16
To: Koukouthaki, Katerina
Subject: FW: Creechurch Lane Conservation Area: Option 3

-----Original Message-----

From: Sharman Kadish [REDACTED]
Sent: Monday, November 6, 2023 12:22 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Cc: [REDACTED]
Subject: Creechurch Lane Conservation Area: Option 3

THIS IS AN EXTERNAL EMAIL

To Whom it May Concern

I am writing in support of the proposed CA Option 3, as proposed by the Georgian Group.

The siting of Bevis Marks Synagogue (Joseph Avis 1699-1701, Grade I Listed) has been threatened all too often in recent years by high rise development in the vicinity. Houndsditch and Aldgate were the heartland of British Jewry since the 'Resettlement' under Oliver Cromwell from 1656. Bevis Marks is the oldest synagogue in the country and one of only three Grade I Listed synagogues in England. It has links back, both architecturally and culturally, to the Esnoga, the Portuguese Great Synagogue of Amsterdam (1675) and itself became the 'mother' synagogue of other Jewish communities in the Western Sephardi world: in the West Indies, the Caribbean, South America - and Sha'ar HaShamayim (rebuilt 1812) in Gibraltar. Thus, the building at Bevis Marks and its immediate neighbourhood are of national and international importance.

Yours sincerely,

Sharman Kadish DPhil (Oxon), FRHistSoc, FSA

Author of 'The Synagogues of Britain and Ireland, (Yale 2011) and companion guidebooks to 'Jewish Heritage in Britain and Ireland' and 'Jewish Heritage in Gibraltar' (2006, 2007, 2015)

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.sharmankadish.com%2F&data=05%7C01%7CKaterina.Koukouthaki%40cityoflondon.gov.uk%7Cdf4e7baf145489da66c08dbdf1e60c0%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638349093775590960%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=YnKOA%2FLpTpOdnC%2F7065xAvuSKXd6SXPxERb8JAw%2B7eA%3D&reserved=0>

She/her

London, Manchester and Jerusalem

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 23:15
To: Koukouthaki, Katerina
Subject: FW: proposed Creechurch Conservation area

From: Christina Emerson [REDACTED]
Sent: Monday, November 6, 2023 10:59 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Re: proposed Creechurch Conservation area

THIS IS AN EXTERNAL EMAIL

Dear Planning Team,

We write in response to your consultation on the designation of a new conservation area in the City of London in the area occupied by Creechurch, Bevis Marks and Aldgate.

The Society for the Protection of Ancient Buildings (SPAB) is the oldest amenity society in the country, founded by William Morris in 1877. Today, we have a statutory role in the secular and ecclesiastical planning systems, with a focus on buildings with fabric dating from 1720 or earlier.

We have reviewed the options and accompanying reports put forward by the City Corporation and Bevis Marks Synagogue. We have also had sight of the alternative proposal formulated by SAVE Britain's Heritage and supported by the Georgian Group. We attended the public consultation held on 20th October and conducted a site visit to assess the area and its buildings in detail.

In responding, we do not propose to assess in detail the significance of the designated and undesignated heritage assets in the area under examination, as this has been done exhaustively by others and we generally concur with the assessments, with the exception of the specific point raised below.

We very much welcome the decision by the City Corporation to consider a new conservation area. We do however have considerable concerns in relation to the conclusion drawn by the accompanying report that Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate, No. 31 Bury Street, and Cunard House should be excluded from the area. You will be aware that the Society objected to a planning application for a very tall building at 31 Bury Street, which was refused planning permission on 5th October 2021, against officer advice. This clearly evidenced the threat to the Bevis Marks Synagogue from ill-conceived development on the adjacent site. Excluding this and the other sites mentioned above from the conservation area would perpetuate the threat to the synagogue from inappropriate development and (in the case of Cunard House) a similar threat to the exceptional Grade I listed St Katherine Cree.

The rationale presented by the report for this decision is that these buildings are not of special architectural or historic interest and therefore do not meet the criteria set out by Historic England for inclusion in a conservation area (Historic England's Conservation Area Appraisal, Designation and Management Second Edition, Advice Note 1). In our view, this constitutes an overly narrow interpretation of the guidance, which does not require that all buildings in a conservation area meet this threshold, rather the area as a whole must meet the requisite tests. The guidance does however state 'conservation area designation is undertaken to recognise the historic character of an area and/or in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest' (P.5 para 10): the inclusion of buildings of neutral significance with the express purpose of

creating a buffer zone to counter the threat of development is therefore clearly sanctioned by the guidance.

In addition, we do not agree with the Corporation's assessment of these buildings as being entirely without significance. Although of varying architectural merit, they are of similar height, mass and scale to their more important neighbours and so contribute to their setting. Their inclusion in the conservation area will be key to ensuring the ongoing protection of that setting and a conservation management plan will be an essential tool in ensuring any change is respectful.

The additional sites proposed for inclusion by SAVE Britain's Heritage are outwith our date remit so we defer detailed comment to others. Nevertheless, a robust and convincing argument has been made for their inclusion in terms of historic and architectural interest and commonality of scale: we support the SAVE proposal as meeting the criteria set out in the Historic England guidance for conservation area designation.

Best wishes

Christina Emerson

Head of Casework



The Society for the Protection of Ancient Buildings
37 Spital Square, London E1 6DY

[Support the SPAB, become a member | spab.org.uk](https://spab.org.uk)
[Facebook](#) | [Twitter](#) | [Instagram](#) | [LinkedIn](#) | [YouTube](#)



Charity no: 111 3753 Scottish charity no: SC 039244 Registered in Ireland 20158736 Company no: 5743962

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 03 November 2023 06:50
To: Koukouthaki, Katerina
Subject: FW: Planning consultation

Sending over.

Lisa

-----Original Message-----

From: [REDACTED]
Sent: Thursday, November 2, 2023 8:41 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Planning consultation

THIS IS AN EXTERNAL EMAIL

Hi,

I choose & prefer Option 3.

[REDACTED]

Koukouthaki, Katerina

From: Harte, John
Sent: 02 October 2023 09:52
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area Consultation
Attachments: Proposed Creechurch Conservation Area Response FR.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

FYI. [REDACTED]

Kind regards



John Harte
Planning Officer | Policy & Strategy
City of London | Environment Department | Guildhall | London | EC2V 7HH

[REDACTED]
[REDACTED] | www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

From: [REDACTED]
Sent: Saturday, September 30, 2023 8:48 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Creechurch Conservation Area Consultation

THIS IS AN EXTERNAL EMAIL

Hi,

My response to the consultation attached. Please acknowledge receipt.

I note that there is reference to buildings being of “special architectural or historic significance” but this is the test for listing, not for inclusion in a conservation area. Please explain the use of these words.

Best regards,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

RESPONSE TO PROPOSED CREECHURCH CONSERVATION AREA CONSULTATION

Below is the text of my unanswered email to Ben Eley, Assistant Director Design, Planning and Development Division of 17 July 2023. The current consultation offers alternative boundaries for the area but none is as extensive as that proposed in my email. To clarify, this should be St Mary Axe, Bevis Marks, St Botolph Street, Aldgate Underground Station, Aldgate High Street and Leadenhall Street.

Dear Ben,

Although I appreciate that, if approved by PT&C on Tuesday, there will be a subsequent public consultation on the proposed CA but my second reaction from reading Appendix 2 was surprise. I'll deal with my first reaction later. Firstly though:

1. Why has Aldgate underground station not been included? I appreciate it's separated from St Botolph Without Aldgate by Dorsett City Hotel:

The building's design is deliberately restrained to ensure an appropriately contextual neighbour to St Alphage Aldgate Church which is the principal focal point in the townscape. [Paragraph 33 (Detailed Design) officer's report to committee, 05 November 2013 re 13/00590/FULMAJ]

suggests a contextual relationship with the Church that would justify the station's inclusion in the CA. In any event the eastern boundary of the CA, along St Botolph Row, includes the new Aldgate Centre, due for completion later this year but seemingly missed by you - your plan is out of date here. Although development may be needed to provide step-free access at the station, the protection of being in a CA, rather than being a narrow block away from one, would give some comfort to the community when that day arrives.

https://en.wikipedia.org/wiki/Aldgate_tube_station

2. I can understand the exclusion of 31 Bury Street because:

The existing character and appearance of the area, together with the setting of several highly graded statutorily listed buildings, such as the Synagogue of 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.[Paragraph 1.03, Draft of XX May 2022]

Further I understand from Alex Morris, that a revised proposal is planned and I presume it has already been subject to pre-application discussions. However, isn't there a conflict of interest here in your Division?

Certainly, it would seem appropriate to let the response to public consultation to determine the inclusion or otherwise of 31 Bury Street. Although, as Rabi Morris suggests, P&TC could agree to add this property on Tuesday.

3. The exclusion of Bevis Marks/Duke's Place (north side) should be from Goring Street to St Botolph's Street and not Aldgate, unless you mean Aldgate Square. As the block between Goring Street and Camomile Street/Houndsditch isn't included, this "exclusion" is irrelevant anyway.

4. There is an obvious payback in that you propose the exclusion of One Creechurch Place. This is primarily as a result of planning permissions which have been approved by City Corporation over the years on the recommendations of successive chief planning officers. That:

It has a wholly negative relationship with the Creechurch locality, and harmed the street pattern, architectural quality and materials to the buildings immediately neighbouring and surrounding, it establishes hard visual and physical barriers between them, save for a link between Creechurch Place and Mitre Square that reorientates a historic connection and creates an unforgiving visual setting for much of the buildings in the locality.

sums up City Corporation's planning regime admirably. However, this block is so positioned that any significant change to it will seriously impact on the CA, so its exclusion makes no logical sense.

5. Cunard House - actually 88 Leadenhall Street - built in 1999 is said to have retained much of the Art Deco styling of the actual Cunard House, which was built on the site in 1930. Although may be outside a natural boundary, it appears to be no higher than many buildings within the CA.

However, it may well be worth reconsidering the CA's southern boundary as Aldgate High Street/Leadenhall Street and its eastern as St Mary Axe. This would enable the inclusion of 30 St Mary Axe as well as the Grade I listed St Andrew's Undershaft and the Grade II listed 38 St Mary Axe.

Then, of course, there is the notable, and, especially for both The Barbican Association (BA) and Golden Lane Estate Residents' Association (GLERA), insulting, difference between the presentation of the Creechurch CA and the presentation of the response to the proposed BA/GLERA Barbican and Golden Lane CA in November 2017. I appreciate there may be both a new Department and a new "regime" but that doesn't excuse the mendacious hatchet job with its arbitrary five zones, produced as a "sop" to residents:

<https://democracy.cityoflondon.gov.uk/documents/s86817/BARBICAN%20AND%20GOLDEN%20LANE%20CONSERVATION%20AREA%20FINAL%20COMMITTEE%20REPORT.pdf>

Worse, though, is the different approach used in 2017 to that used in 2023. For instance existing complete pre-WW2, and earlier, road patterns north of Beech Street in Zone 2 were

ignored in 2017 but not in Creechurch in 2023. As a result, an important section of this area, comprising 45 Beech Street, Bridgewater House, The Cobalt Building, Tudor Rose Court, Eglwys Jewin, Clarendon Court and 1 Golden Lane, unreasonably lost a level of protection, notwithstanding the latter's status failing to protect it from the ongoing assault on its listed eastern facade.

Other approaches adopted in 2017, although shown to have been interpreted subjectively and mostly incorrectly, led to the exclusion of virtually all of Zones 4 and 5. Also strips of land on the north of Golden Lane Estate were excluded with no explanation offered.

The majority of responses to the subsequent public consultation supported the inclusion of all five zones but were ignored. This meant that virtually all of both Zones 2 and 4 and the whole of Zone 5, were excluded, despite the latter including the Brewery CA! If there is justification for proposing the creation of the Creechurch CA, then there is more than enough justification for revising the Barbican and Golden Lane CA in line with that proposed by BA and GLERA. Please confirm that this will be implemented.

Best regards,

■

30 September 2023

■
■
■

1. Do you agree that the Creechurch area should be designated as a conservation area?

- Yes No I don't know

(Please select only one answer)

2. Which is your preferred option? If you don't like any of them you can offer an Option 4.

- Option 1 Option 2 Option 3 Option 4

3. If you chose Option 4, please describe your preferred boundary.

4. Why do you think your selected area is of special architectural or historic interest?

A natural addition to the City's CAs
It is surprising that St. Katharine Cree & St.
Bolph Aldgate have not been so recognised
before now. It helps knit together the place names
and neighbourhood identity

5. Please share any additional general information and facts about the area to support your choice.

The area linkages in place names - Henage -
bubble up in Whitechapel - Henage, Finch, Osborn
Chicklands & Old Montague St. ~ the Osborn
family estate interests in King Charles Nursery Gdns
for 12 generations (Chicklands Bedfordshire)

Conservation Area Support documentation could pick up
on place name and ownership of estates.

Pick up on popular culture ~ Oranges & Lemons verses
forgotten "Bells of St. Katharine" "Old Father Bald Pate" (Aldgate
Jewish community seems well covered. Anything from literature?)

Daniel Deanda! George Elst.

6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

7. Please explain your answer to Question 6.

8. Is there anything that could be done to mitigate any impacts identified?

Please tell us your name and association with the proposed conservation area.

LESTER HILLMAN
Farrington Within of W. Ward Member (Life)
Born in the City.
Member of City Conservation Area Advisory Committee

> 10 years. Adviser to Friends of Chickensands Priory Bedfordshire
Member RTP1 (retd)

If you wish to receive updates about this consultation, please tell us your email address.

1. Do you agree that the Creechurch area should be designated as a conservation area?

- Yes No I don't know

(Please select only one answer)

2. Which is your preferred option? If you don't like any of them you can offer an Option 4.

- Option 1 Option 2 Option 3 Option 4

3. If you chose Option 4, please describe your preferred boundary.

4. Why do you think your selected area is of special architectural or historic interest?

These are non-listed buildings that
~~are~~ an excellent example should be preserved
for the general 'ambiance' of the area.

5. Please share any additional general information and facts about the area to support your choice.

6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

NOT RELEVANT.

7. Please explain your answer to Question 6.

8. Is there anything that could be done to mitigate any impacts identified?

Please tell us your name and association with the proposed conservation area.

ACTIVE MEMBER OF BEVIS PARK SYDNEY GROUP.

If you wish to receive updates about this consultation, please tell us your email address.

1. Do you agree that the Creechurch area should be designated as a conservation area?

- Yes No I don't know

(Please select only one answer)

2. Which is your preferred option? If you don't like any of them you can offer an Option 4.

- Option 1 Option 2 Option 3 Option 4

3. If you chose Option 4, please describe your preferred boundary.

4. Why do you think your selected area is of special architectural or historic interest?

Because of the Central Position of
of Bevis Marks Synagogue, opened 1701,
which is a listed Building.

5. Please share any additional general information and facts about the area to support your choice.

6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

7. Please explain your answer to Question 6.

8. Is there anything that could be done to mitigate any impacts identified?

Please tell us your name and association with the proposed conservation area.

If you wish to receive updates about this consultation, please tell us your email address.