

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 area 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

 $^{^{\}rm 1}$ 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 $18^{\rm th}$ 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.





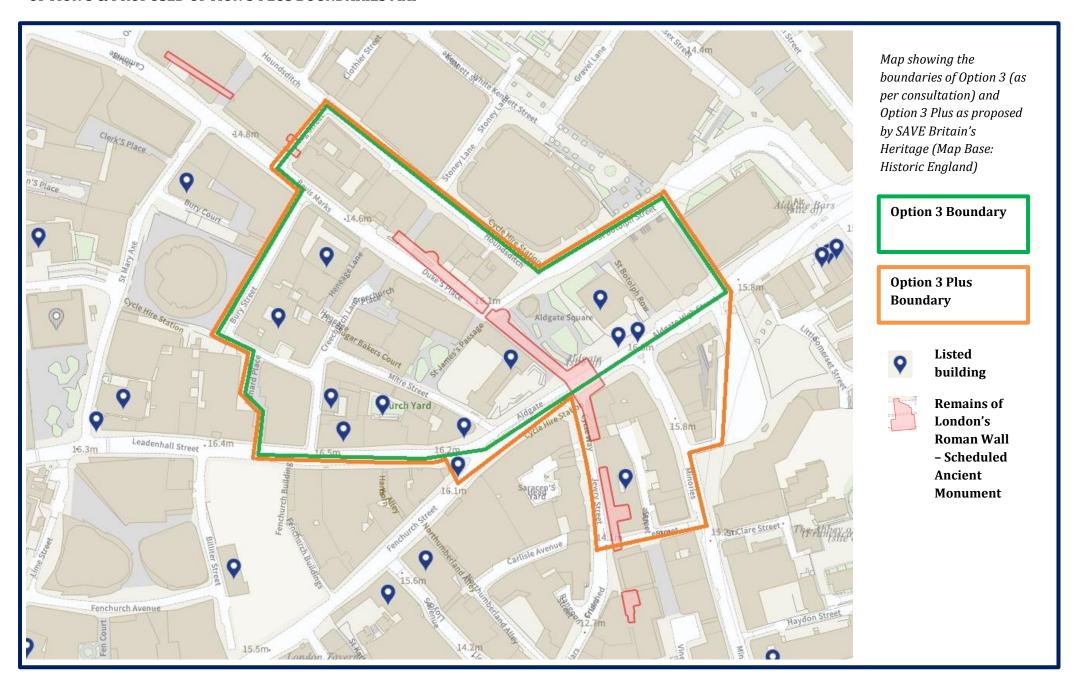
Above: Aldgate Square forms a focal point for the conservation area which creates a visual and practical connection with the historic buildings on both sides of Aldgate High Street (Credit: SAVE Britain's Heritage)

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

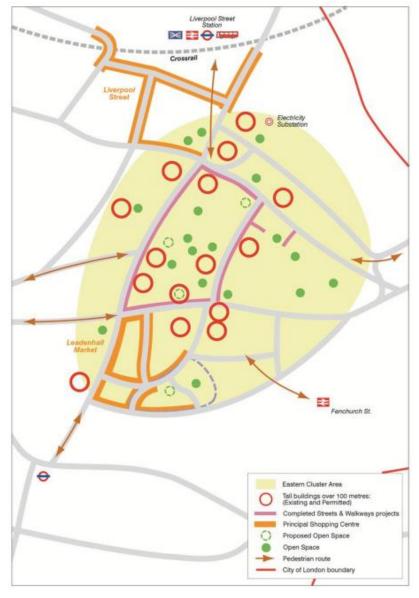


MANAGING DEVELOPMENT PRESSURE POSITIVELY

The Bevis Marks Synagogue is one of the most important historic synagogues in the world, and of international significance. The sensitivity of it 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.

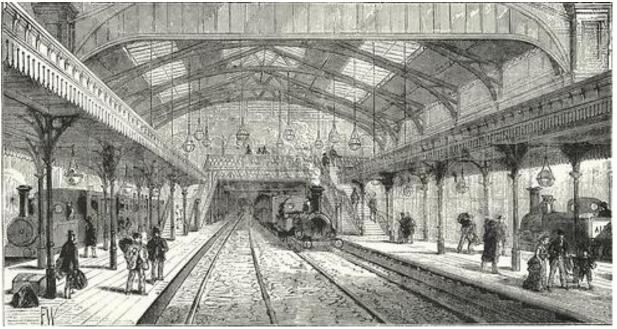
The trainshed and station below retain many features of the original design, including the unusual turquoise and maroon tiling patterns at street level, with decorative ironwork platform canopies, stock brick retaining walls and cast-iron columns supporting these structures from below, with attractive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



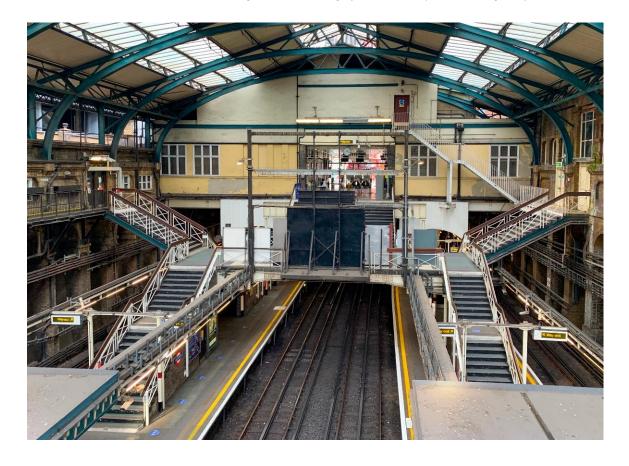
View looking north within the Victorian trainshed of Aldgate Underground Station, completed in 1876, with the cast iron span roof over the four platforms below (Credit: SAVE Britain's Heritage)

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.

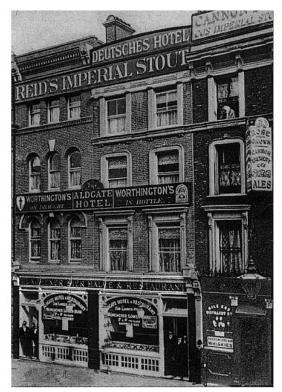
The collective presence and survival of these buildings on the areas medieval street pattern focuses and frames the view north up Minories towards the church tower of St Botolph without Aldgate. Sheet 121 of Goad's Insurance Maps Vol III (copied below with buildings circled in green) shows that 76-78 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 Goad'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 Creechurch 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 consdieration.

A further connection with the conservation area as proposed is the preservation of further fragments of Roman Wall with the basesments 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



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)