

Heritage Statement

The White Hart, 184 New Cross Road, London
Borough of Lewisham

April 2020

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Client
Wellington Pub Company

April 2020

1. Introduction

Purpose of this Report

- 1.1 This Heritage Statement has been prepared by Turley Heritage on behalf of our Client the Wellington Pub Company in order to provide a proportionate understanding of the heritage significance of The White Hart Public House at No.184 New Cross Road (grade II listed) (the Site), together with the surrounding Hatcham Conservation Area, within the London Borough of Lewisham.
- 1.2 Using this understanding of heritage significance, this report also provides relevant information to the local planning authority with regard to the heritage impacts of proposals for the proposed change of use from a hotel to 4no. residential apartments, and associated internal and external alterations to the listed building. This report is provided in support of an application for Listed Building Consent.

Planning History

- 1.3 The recent planning history for this Site is particularly relevant to the consideration of this new application for Listed Building Consent for works of alteration to the listed building.
- 1.4 Listed Building Consent was approved at Planning Committee on 1 August 2019 (LBL reference DC/18/106611), following a recommendation to approve by officers. The Decision Notice was issued on 8 August 2019. The description of proposed works is:

"Listed building consent for alterations in connection with the conversion of the upper floors of No 184 New Cross Road, SE14, into 2 one bedroom, self-contained flats, a two bedroomed self-contained flat and a one bedroomed self-contained maisonette with study, together with the reconfiguration and retention of the existing public house at ground and basement level and the provision of two lantern lights to the flat roof at the rear of the existing public house"
- 1.5 Listed Building Consent was approved with eleven Conditions (including a number of pre-commencement conditions).
- 1.6 In tandem an application for Planning Permission for the related proposed development and works on this Site (LBL reference DC/18/106613) was submitted by our Client. Officers recommended that the Council refuse this application for planning permission. The Planning Committee then considered and confirmed their decision to refuse the application at their public meeting on 1 August 2019, whereby one reason for refusal was given. 'Reason 1' sets out that:

"1. The proposed conversion of the upper floors to residential use, by virtue of the restrictions imposed by the building's statutory listing which limit the maximum noise attenuation that can be achieved, would result in unacceptable living conditions for future residents, in terms of noise and vibration, that cannot be mitigated by conditions as any such conditions would amount to unreasonable restrictions on the use of the pub which is of a unique and intrinsic character that caters to a diverse clientele and

contributes materially to the economic, social and cultural lives of local residents and the late night economy and culture of New Cross, contrary to the NPPF (2019), NPPG, Policies 3.1, 4.6, 4.8 and 7.15 of the London Plan (2016), Policies GG1, HC5, HC6, HC7, D1, D12 and D13 of the draft London Plan (2019), Objective 5 and Policy 19 of the Core Strategy (2011), Policies 20, 26 and 43 of the Development Management Local Plan (2014) and the provisions of the Culture & the Night-Time Economy SPG (2017)."

- 1.7 The Decision Notice was issued on 8 August 2019.
- 1.8 An appeal against the refusal of Planning Permission was made to the Secretary of State (Planning Inspectorate) on the 14 November 2019. A start date subsequently issued by PINS as the 25 November 2019, and then confirmed that a Public Inquiry would be held for this appeal starting from the 17 March 2020. Due to current Governmental restrictions in light of Covid-19 this inquiry has been postponed.
- 1.9 The new application for Listed Building Consent, which is the subject of this Heritage Statement, relates to a revised scheme that is in most part closely comparable to that previously approved. The key differences relate to the introduction of additional physical measures to mitigate noise propagating to the upper floors.
- 1.10 It is important to note in addition that during the period of the determination of the previous Listed Building Consent application revisions were made to the scheme. These included a change to retain and adapt the existing secondary staircase between second and third (attic) floor levels internally. It was as a result of this change to the scheme that Historic England confirmed that they would withdraw their previous objection to the application (HE letter dated 2 October 2018).

Legislation and Policy Context

- 1.11 The requirement for this report stems from section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which places a duty upon the local planning authority in determining applications for development affecting listed buildings to pay special regard to the desirability of preserving the building or its setting. Under section 72, the Act also requires that special attention be given to preserving or enhancing the character or appearance of a conservation area.
- 1.12 The National Planning Policy Framework (NPPF) 2019 provides the Government's national planning policy of the conservation of the historic environment. In respect of information requirements it sets out that:

*"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*¹
- 1.13 Paragraph 190 then sets out that Local Planning Authorities should identify and assess the significance of heritage assets which may be affected by planning proposals,

¹ DCLG, National Planning Policy Framework (Framework) 2019 – paragraph 189

including those affecting the setting of the heritage asset. They must then consider this assessment when reviewing the impact of any proposals, in order to avoid or minimise harm arising from the proposal.

Structure of this Report

- 1.14 In accordance with the legal policy context, **Section 2** of this report firstly identifies the relevant heritage assets on the Site and within its vicinity that may be relevant to the Site's development / works.
- 1.15 **Section 3** then provides an assessment of significance for the listed building on Site, in terms of its special architectural and historic interest and group value, and the relative significance of its different elements to the whole. A statement of significance is also provided for the surrounding conservation area; in terms of its historical development, character and appearance, specifically relevant to the Site. This assessment is based on review of relevant published information, focussed archival research and also on-site inspection and analysis; and has also been drawn directly from our previous Heritage Statement dated March 2018.
- 1.16 **Section 4** undertakes an overview of the revised application proposals and their likely impact on the significance of the listed building and conservation area. These impacts are then assessed overall in light of the relevant statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy contained within the NPPF 2019 and supported by the NPPG, and also regional and local planning policy for change within the historic environment.
- 1.17 **Section 5** draws together a summary of the findings of this report with regard to heritage impacts.
- 1.18 The list entry for The White Hart is reproduced in **Appendix 1**. A map of Hatcham Conservation Area is reproduced in **Appendix 2**. The relevant heritage legislative, policy and guidance context regarding heritage assets is set out **Appendix 3**.

2. The Heritage Assets

Introduction

- 2.1 The National Planning Policy Framework (NPPF) 2019 defines a heritage asset as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.”²

Designated Heritage Assets

- 2.2 Designated heritage assets are those which possess a level of heritage interest that justifies designation and are then subject to particular procedures in planning decisions that involve them.

Grade II Listed Building: The White Hart

- 2.3 The White Hart PH was first included on the statutory list of buildings of special architectural and historic interest in February 1999. The list entry (included in full at Appendix 1) describes:

“Public house. Circa 1870, shown on the 1873 Ordnance Survey Map. Polychrome brickwork with stuccoed dressings, slate roof concealed by parapet and brick chimneystacks. Corner building of three storeys; five windows to New Cross Road elevation and two to Queens Road, including a tripartite window. Elaborate parapet with curved panel to Queens Road, pedimented panel with brackets to New Cross Road and modillion cornice. Corner full-height pilasters and bands between floors. All windows are sashes with vertical glazing bars and horns. Second floor windows are cambered with keystones and two windows have cast iron flower guards. First floor windows have round-headed arches filled with stuccoed decoration with keystones above, roundels between the windows and cast iron flower guards. Bar front has fascia, end pilasters with double brackets and windows with ventilation grilles above divided by pilasters. Interior retains a bar partition and both bars have original panelled wooden counter.”

- 2.4 There are several other listed buildings within the surrounding area; however, the emerging proposals are not considered to have the potential to impact upon their significance. As such, they are not considered further within this report.

Hatcham Conservation Area

- 2.5 The White Hart is located within Hatcham Conservation Area, which was designated in 1990. A map of the conservation area’s boundaries is reproduced in Appendix 2. A Conservation Area Study was published in February 2006, which evaluated the historic development, and positive and negative elements of the townscape, as well as opportunities for enhancement.

² DCLG, National Planning Policy Framework (Framework) 2019 - Annex 2: Glossary

Non-designated Heritage Assets

- 2.6 The Framework identifies that heritage assets include both designated heritage assets and assets identified by the local planning authority (including local listing).³

Local List

- 2.7 The London Borough of Lewisham maintains a Local List (last published February 2014). The White Hart PH is located close to a small group of locally listed buildings at Nos. 397, 397a, 399 & 401 Queen's Road. However, the nature and extent of the proposals means that these buildings will not be affected, and they are not considered further within this report.

³ DCLG, National Planning Policy Framework (Framework) 2012 - Annex 2: Glossary

3. Assessment of Heritage Significance

Introduction

3.1 The NPPF 2019 defines the significance of a heritage asset as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”⁴

3.2 Historic England has published guidance with regard to the preparation of statements of heritage significance, and how the proper analysis of the significance of heritage assets should be used to inform an assessment of impacts on that significance as a result of proposed change / applications.⁵

3.3 The NPPF defines the setting of a heritage asset as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”⁶

3.4 Historic England has published advice in respect of the setting of heritage assets, which sets out general principles for understanding the relative contribution of setting to heritage significance, and also ways to assess the impact of any changes as a result of and proposed development.⁷

3.5 Historic England has also past provided further guidance for their staff (and others) on their approach to making decisions and offering guidance about all aspects of England’s historic environment⁸. This provides advice on how to assess the contribution of elements of a heritage asset, or within its setting, to its significance in terms of its “heritage values”. These include: evidential, historical, aesthetic and communal. This supplements the established definitions of heritage significance and special interest set out in founding legislation and more recent national planning policy and guidance.

Listed Buildings

3.6 Listed buildings are defined as designated heritage assets that hold special architectural or historic interest.

3.7 The principles of selection for listed buildings are published by the Department of Culture Media and Sport,⁹ and supported by Historic England’s Designation Listing

⁴ DCLG, National Planning Policy Framework (NPPF) 2012 - Annex 2: Glossary

⁵ Historic England: Advice Note 12: Statements of Heritage Significance 2019

⁶ DCLG, NPPF, 2012 – Annex 2: Glossary

⁷ Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, 2017 (2nd Edition)

⁸ English Heritage (now Historic England) Conservation Principles: Policies and Guidance, 2008

⁹ DCMS Principles of Selection for Listing Buildings, 2018

Selection Guides for each building type.¹⁰

Conservation Areas

- 3.8 Conservation areas are designated if they are of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.
- 3.9 Historic England has published guidance in respect of conservation areas and this provides a framework for the appraisal and assessment of the special interest and significance of a conservation area, which has informed the preparation of this baseline heritage appraisal.¹¹

Assessment

- 3.10 The following statements of heritage significance are proportionate to the importance of each of the likely affected designated heritage assets, and also provide a sufficient level of description to understand the potential impacts of the application proposals on Site. Assessment is based on a review of published information, focused archival research and on-site visual survey and analysis.

¹⁰ Historic England, Listing Selection Guide: Commerce and Exchange Buildings, 2011

¹¹ Historic England, Advice Note 1: Conservation Area Designation, Appraisal and Management, 2019 (2nd Edition)

Grade II Listed Building: The White Hart PH, No.184 New Cross Road

Historical Development

- 3.11 The existing public house was constructed on the site of an earlier, 18th or early-19th century building, which is seen in historic photographs of the Site (Figure 3.1). The 19th century photographs below reveal the appearance of the earlier building, which comprised a terrace of four shop premises, likely with ancillary office or residential accommodation to the upper floors. This brick-built, Classically-influenced terrace had regularly-spaced sash windows and a deep stucco cornice at parapet level. The photograph dated c.1850 also shows the New Cross toll gate, which was removed in 1865; whilst the right-hand photograph shows the 'stink pipe' – a ventilation pipe which served the public conveniences that were formerly located on an island site at this road junction.



Figure 3.1 – 19th century photographs of the junction of New Cross Road and Queen's Road, showing the building formerly located on the Site of The White Hart. (Left-hand photograph dated c.1850.)

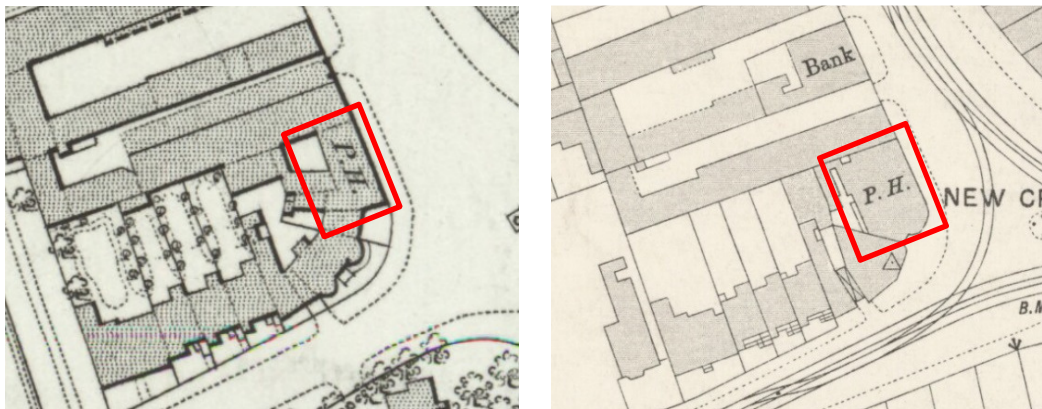


Figure 3.2 – OS maps dated 1873 (L) and 1895 (R), showing The White Hart.

- 3.12 The list entry for The White Hart indicates that the public house was built circa 1870, and the Ordnance Survey (OS) map for 1873 shows that it was extant by this year (Figure 3.2). This map does not depict the distinctive curve of the southern elevation overlooking the road junction; however, this is shown in the later 1895 OS map. Also between 1873 and 1895, the two maps show that the rear of the public house was

extended into the depth of the plot in this period. This extension is likely to be the large seating area at the rear of the premises today.

- 3.13 A late-19th or early-20th century photograph of The White Hart reveals its early appearance (Figure 3.3). At ground floor, decorative pilasters divided large-paned windows, and four entrances: one in the southern-most bay, a second in the curved bay, and two on the elevation overlooking New Cross Road. The pilasters supported a deep fascia, over which hung four substantial, wrought iron lanterns.
- 3.14 To the upper levels, the New Cross Road elevation was arranged over five bays, whilst the curved southern bay had a Venetian window at each level. A further, single bay connected The White Hart to the adjacent building. The windows were decorated with brick arches, mouldings within the arches, stuccoed key stones, elaborate iron flower guards, and roundels. At roof level, a modillion cornice gave way to a flat parapet, broken in two places by projecting pediments which displayed the brewery signage of 'Coombe & Co.'. Finally, the statue of a white hart stood atop the southern pediment, whilst some images also show a flag pole with the Union Flag (Figure 3.4).



Figure 3.3 – An late-19th or early-20th century photograph of The White Hart.



Figure 3.4 – Historic photographs of the public house; undated (L) and c.1910 (R).

3.15 The White Hart sustained some minor blast damage in the Second World War, as shown by its yellow shading in the London County Council bomb damage map (Figure 3.5). This damage may account for the alterations to the building that are seen in a photograph dated 1950 (Figures 3.6 and 3.7). In this photograph, both the flag pole and white hart statue have been removed (possibly as a precaution in war time), whilst both of the roof-level pediments appear to have been reconstructed in different brickwork to the rest of the building. At street level, the large lanterns have been removed, and the decorative pilasters have been replaced with a tiled frontage typical of early-20th century public house treatment. The fascia board also appears to have been renewed. Interestingly, the pub displays signage for the brewing company Watneys, and this reflects that company's acquisition of the former Coombe & Co. in 1898, to form the famous Watney Combe & Reid brewing company.



Figure 3.5 – London County Council bomb damage map, 1941.



Figure 3.6 – Photograph of The White Hart dated 1950.

- 3.16 A plan of the ground floor level of The White Hart, dated 1898, shows the layout of the pub premises at the end of the 19th century (Figure 3.7). This drawing depicts a phase of alteration to the pub which was carried out by the architectural firm Eedle and Meyers, which specialised in pub design from the 1880s to 1946. Unfortunately, the drawing does not include a key to identify the meaning of the different colours used.

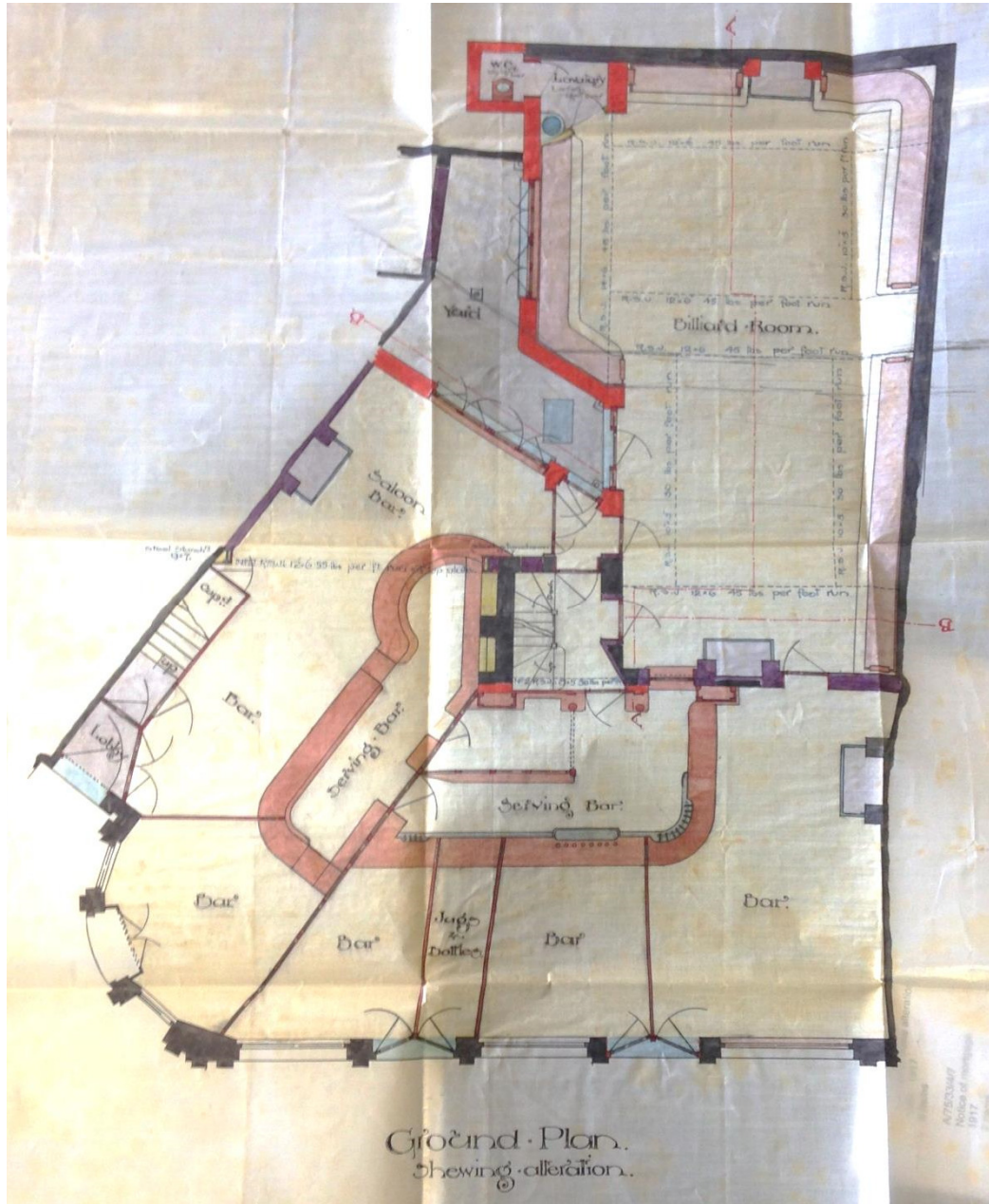


Figure 3.7 – Drawing of the ground floor, dated 1898.

- 3.17 The 1898 drawing above shows the four original door openings into the building from the street; three of which served the public house and the fourth which lead to a staircase providing access to the upper levels. This fourth entrance and staircase indicates that there were public rooms at first floor level. At ground floor in the pub premises, there were two 'serving bars', both with front bars and back bars, whilst the public space was divided by partitions into five distinct bar spaces; two of which had fire

places. At the rear, there was a large billiard room (contained within the 1873-1895 rear extension), and a small yard space. Finally, in the heart of the building, a small stair core provided access to the basement and also the upper levels of the building. This more private, confined staircase would have been for the publican and staff to access the first floor level.

3.18 Investigation of the planning history for the building shows that planning permission and listed building consent were granted in 2005 for the conversion of the upper floors to hotel use; however, no drawings are available online. The local authority has also advised that they were unable to locate any files for the building, and it may be that these were destroyed some years ago when their basement flooded.¹² It has therefore not been possible to establish clearly the extent of alteration to the plan form and fabric of the building in association with these planning approvals.

3.19 In May 2016 listed building consent was granted for external alterations to the front elevation of The White Hart, together with internal alterations to the bar the laying of new floorboards, the re-location of a fireplace, the restoration of original internal features including columns, panelling and lime plaster to internal walls, and the retrospective removal of non-original features at ground floor level.¹³ This phase of alteration to the building indicates that it had previously undergone extensive alteration – as highlighted in the Heritage Statement that accompanied the 2016 application. This stated:

“Internally, the building has been altered and adapted several times, with a number of insensitive modern partitions and other changes to the layout. Some original features have been removed...But in particular the original spatial arrangement of the ground floor bar has been changed beyond recognition.”

3.20 These works have been completed with the approval of local authority officers.

Architectural Interest

External

Front Elevation

3.21 As found today, the relatively large scale, and elaborate decorative frontage of The White Hart PH makes this building a prominent part of the street scene at the wide junction of New Cross Road and Queens Road (Figure 3.8). This prominence is typical of public houses, which benefit from increased visibility within the street scene as a hub of local social activity. Historically, its landmark quality would have been enhanced by the white hart statue and flagpole which previously projected from the pediments at roof level. The prominence of the building within the street scene allows a clear appreciation of its historic use as a public house, and of the attractive frontage of the building.

¹² Application references DC/04/058029/X and DC/04/058030/X.

¹³ Application reference 16/098811.



Figure 3.8 – The White Hart Public House, No.184 New Cross Road.

- 3.22 The special architectural interest of The White Hart is primarily derived from the historic and architectural character of its principal street elevations. Taken together, the tiled street frontage, generous windows, substantial fascia and signage, decorative pilasters and hanging baskets mean that this building is easily-distinguishable as a public house (Figure 3.9). In addition, the Classically-influenced treatment of the upper levels is also typical of this building type, and in particular the carved grapes in the first floor window arches tell of the building's original and continuing function. As well as the detailing of the principal elevations, the scale and decorative roof form of The White Hart help this building to stand out visually in the street scene, thereby reinforcing its role as a landmark within the street and local society.



Figure 3.9 - The detailing of the principal elevations, and the scale and decorative parapet of pub help this building to stand out visually in the street scene.

Rear Elevation

3.23 The rear elevation of The White Hart is of plain stock brick, and the notably more utilitarian character of this side of the building reflects its lower status, relative to the principal elevations overlooking the street. The brickwork of the elevation has been patched with cementitious mortar in several places, whilst a small part of the parapet appears to have been rebuilt at parapet level, around the third floor window. The reason for this is unknown, though it could possibly be attributed to the slight bomb damage the building sustained during the Second World War.

3.24 Two original window openings at first and second floor have been lengthened, to create door openings to terrace roofs; and a small, triangular addition has been made to the rear at first floor level, which contains the pub kitchen. Though the brickwork of this addition is well-matched to the host building, the differing treatment of its window lintels indicates its later origins, when compared to the main elevation (Figure 3.10).



Figure 3.10 – Rear elevation, and later kitchen extension.

- 3.25 The existing staircase to first floor level is a later insertion, and this is especially prevalent at the rear, where a sloped roof over the staircase has been installed and is visible (Figure 3.11). A terrace has also been created at roof level over the late-19th century, single storey extension, with access via a staircase at the rear of the plot.
- 3.26 Overall, the later extensions and alterations to the rear elevation of The White Hart, as well as unsympathetic additions such as two substantial kitchen flues, have diminished the building's historic character and appearance. The deteriorating condition of the existing terrace also detracts from its architectural quality, so that overall this part of the listed building makes a more limited contribution to its heritage significance.



Figure 3.11 – Rear elevation, and first floor roof terrace.

Internal

- 3.27 The following assessment of heritage significance includes assessment of all floor levels within the listed building, in order to provide an understanding of their relative contributions to the significance of the building as a whole. However, it is important to note that the emerging proposals are confined to the upper levels of the building, which are currently in use as a hotel.

The bedroom numbers referred to in the following appraisal of the upper floors correspond to those on the 'existing' drawings prepared by Kruszelnicki Leech Architects, dated 29th September 2017.

Ground Floor and Basement: The Public House Premises

- 3.28 Internally, the ground floor level has been in continuous use as public house premises since The White Hart was constructed circa 1870. As found today, the small, angular yard space between the original, circa 1870 building and the later rear extension has been in-filled; whilst the interior has lost the historic partitions seen in the 1898 floor plan, as well as the original public staircase to the first floor level.
- 3.29 Nonetheless, the existing space displays some of the fittings which, when brought together, create a distinctive pub premises: mahogany bar counters, shelving, mirrors, signage, deep cornices and embossed ceilings (Figure 3.12). The 2016 phase of refurbishment aimed to *“retain the historic character of the bar, and where possible to*

enhance the original features¹⁴, and the Heritage Statement for this planning approval indicates that the cornicing, embossed ceilings, etched mirrors, bar front and cast iron pillars are original, or at least historic. These features were all revealed and / or refurbished as part of the 2016 permission. The Historic England selection guide for commerce and exchange buildings says of public houses:

“Not all pubs were lavishly decked out but most had some of the fittings that, when brought together, created the iconic ‘gin palace’: partitions, frosted glass windows, decorative tiling, embossed ceilings, occasionally with public rooms upstairs. The high point of pub building was in the decades either side of 1900.”¹⁵



Figure 3.12 – Bar premises at ground floor level, with original panelled bar (but modern mahogany counters), embossed ceilings and cornicing.

- 3.30 The list entry for the public house notes that at the time of designation (1999) the building retained a bar partition, whilst both bars had an original panelled wooden counter. The mahogany bar tops were removed in the late-20th century, but were reinstated as part of the 2016 works. The historic fire surround from the northern chimney breast was also relocated to the southern chimney breast, which is within the public bar area (Figure 3.13).

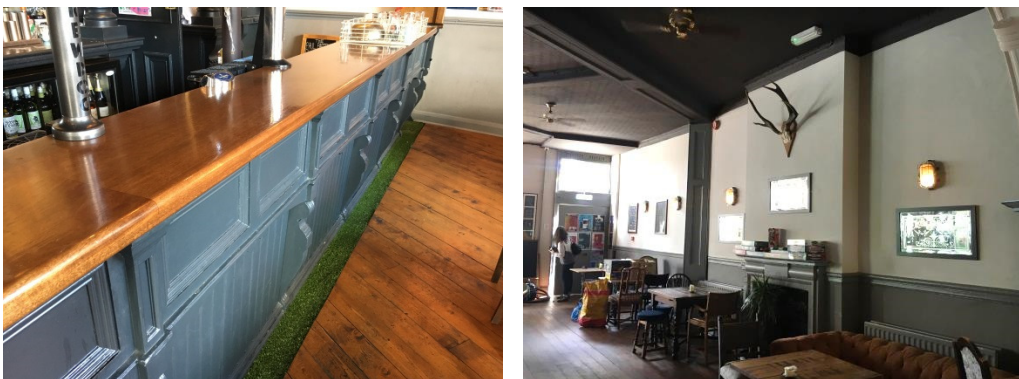


Figure 3.13 - Original bar with reinstated mahogany bar top (L); and historic fire surround relocated to the public bar space (R)

¹⁴ April 2016 Heritage Statement prepared by the Survey and Design Partnership, which accompanied application reference 16/098811.

¹⁵ Historic England, Listing Selection Guide for Commerce and Exchange Buildings. April 2011.

- 3.31 Modern partitions have been inserted at the front of the ground floor within the bar space, to create a narrow corridor which provides access to a flight of stairs and the hotel accommodation above (Figure 3.14). These partitions are set at an awkward angle, and have compromised the original extent of the commercial premises. The narrow sliver left at the northern end of the plan form is also an awkward space to use.



Figure 3.14 – Partitions have been inserted within the original pub space to create an access corridor to the hotel accommodation.

- 3.32 At the rear of the ground floor there is a large seating area, which the 1898 plan identifies as having formerly been a billiards room (Figure 3.15). This part of the pub premises is notably more utilitarian, and this reflects its origins as a later extension to the building. This space has also been partitioned to create bathrooms, with a stairway leading to the roof level of the extension. Overall, the later date, and more modest decorative treatment of this part of the public house means that it makes a limited contribution to the significance of the listed building.



Figure 3.15 – The former billiard room, in the late-19th century, single-storey extension at the rear of the public house.

- 3.33 Finally at ground floor level, in the centre of the floor plan there is a small stair core. As found today, only the straight flight to the basement survives; the narrow upward flight to the first floor, seen in the 1898 drawing, has been curtailed and only a few treads and the newel post survive (Figure 3.16).

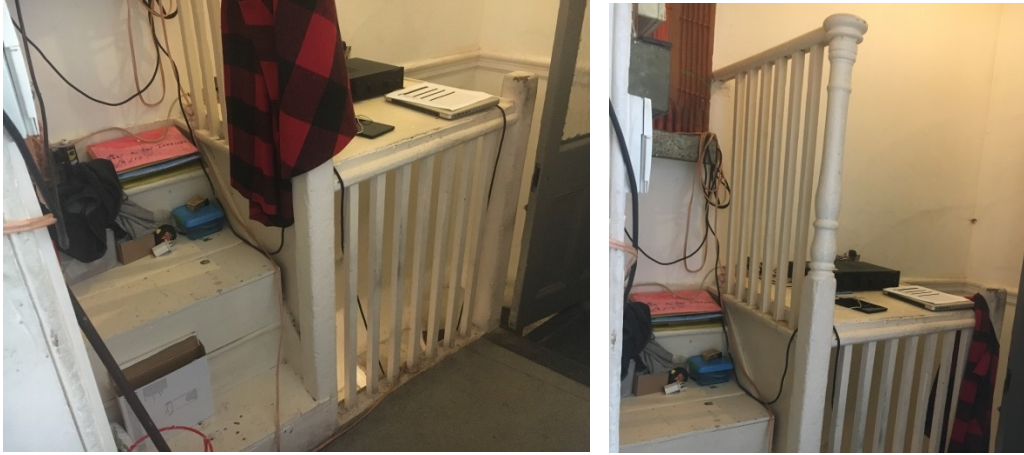


Figure 3.16 – Original stair core between basement, ground and first floors; the basement stair survives, but the flight to the first floor has been curtailed.

- 3.34 Overall, the original layout of the commercial premises at ground floor is no longer easily discernible. Comparison of the existing plan form with that seen in the 1898 drawing (Figure 3.7) shows that considerable alterations have occurred; in particular the loss of the historic bar partitions and staircases. Despite this, the survival and restoration of some traditional, high-quality features at The White Hart accumulate to create a pub premises which is distinctive, and which enhances the special interest of the building as a good example of the building type.



Figure 3.17 – Historic floor and wall surfaces are visible in places

- 3.35 The basement level of the building is thought to retain large elements of its original plan form; comprising a series of rooms leading from the central hallway. In some places, the original brick and stone flooring is visible, though largely there is a layer of concrete covering the historic surface (Figure 3.17). At ceiling level, the floor joists and boards of the ground floor are also visible in several places; which indicates that the carcass of the

listed building has survived. Aside from the plan form, the basement is notably plain and utilitarian, and makes a limited contribution to the significance of the listed building (Figure 3.18).



Figure 3.18 – The basement level of The White Hart is notably plain and utilitarian

Upper Floors: The Hotel Premises

- 3.36 Originally, the first floor level of The White Hart would have been used to some extent for additional public space (as indicated by the public staircase in the 1898 ground floor plan); but likely also comprised part of the residential accommodation of the publican and family. Because it contained the public space and the principal living quarters of the residential accommodation, the first floor would have held high status in the hierarchy of floor levels, and would have been decorated accordingly. Meanwhile, the second floor would have contained more private rooms, including bedrooms; and this level would have held lesser status relative to the principal ground and first floors, and would likely have received more modest decorative treatment accordingly.
- 3.37 In 2005 the upper floor levels were converted to hotel use. Unfortunately, the local authority has been unable to locate the drawings associated with this approval, and has advised that this documentation may have been destroyed in a basement flood some time ago. However, it is thought that the existing plan form of the upper levels is the product of the 2005 phase of conversion.

First Floor

- 3.38 As previously described, partitions have been installed in the pub premises at ground floor, to create an access hallway to a modern flight of stairs. This leads to a landing at first floor level, where the original staircase is located (Figure 3.19). The original staircase previously had flights giving access to the ground floor – as seen in the 1898 drawing; however, the lower flights have since been removed, so that the modern stair is now the only internal access to the upper floors of the listed building. Overall, these alterations have compromised legibility of the original plan form and historic fabric of the listed building, which has in turn diminished legibility of the historic patterns of use and circulation routes.



Figure 3.19 – Modern stair flight, leading to the original staircase, the lowest flights of which have been removed.

- 3.39 The first floor level of The White Hart has been heavily partitioned, to create an apartment for the hotel manager, in addition to four hotel bedrooms and a communal bathroom, as well as the commercial kitchen associated with the pub premises below. The historic plan form at this level is now very difficult to discern due to the extent of alteration; however, some historic features and fabric remain to give a broad indication of the historic plan form
- 3.40 An original chimney breast survives within Bedroom 4, whilst a single cornice and skirting are shared by Bedroom 4, and the hotel office, Bedroom 5, and the lounge (Figure 3.20 and 3.21). This is a strong indication that there was historically a single, large room at the front of the public house, with the fireplace at one end and the distinctive curved wall at the other. The fire surround within Bedroom 4 also matches the historic surround at ground floor within the pub premises; and this indicates that it is also of some age.



Figure 3.20 – The fire place in Bedroom 4, and the cornice that is shared by Bedroom 4 and the rooms in the manager's flat.

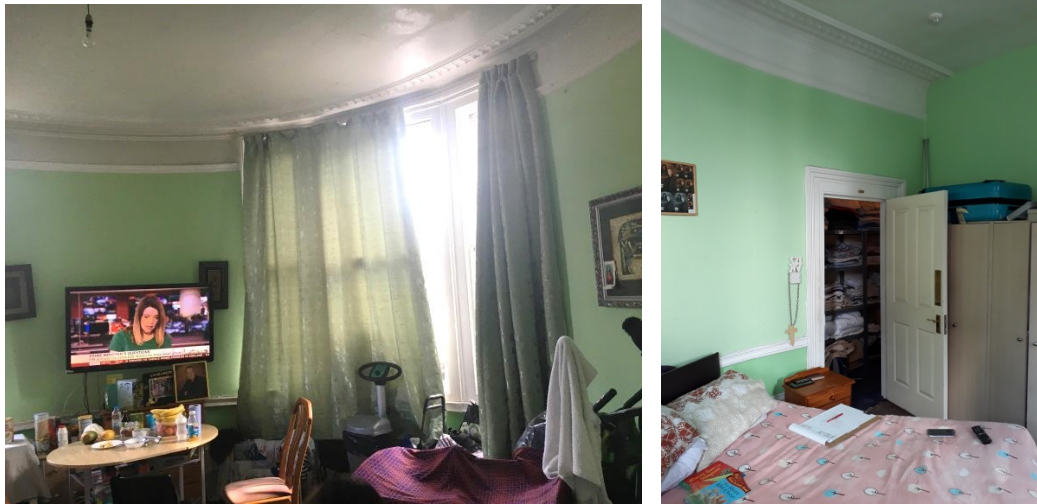


Figure 3.21 – The curved room in the managers flat, at the south end of the building.

- 3.41 The public staircase from street level to the first floor was originally located against the southern envelope wall, in the position of the existing kitchen’s storage cupboard (Figure 3.22). It is therefore likely that the rear of the listed building also comprised a public room; which may have been divided from the principal room at the front of the building by a central corridor, such as is found on site today. Initial inspection has revealed that historic floorboards have survived in several places.



Figure 3.22 – The kitchen store cupboard, in the location of the original public stair access.

- 3.42 The existing kitchen is thought to occupy the rear of the original building, together with a later, triangular rear extension (Figure 3.23). The later provenance of this extension is indicated by the different treatment of the brick window lintels, compared with the rest of the rear elevation. A substantial down-stand across the kitchen ceiling also indicates the location of the original rear elevation. As found today, no historic features or fabric remain at surface level within this commercial kitchen, and it is difficult to discern its original use or appearance. As such, its contribution to the significance of the listed pub overall is diminished.



Figure 3.23 – Pub kitchen at the rear of the first floor level, which occupies the rear of the original listed building, together with a small later extension.

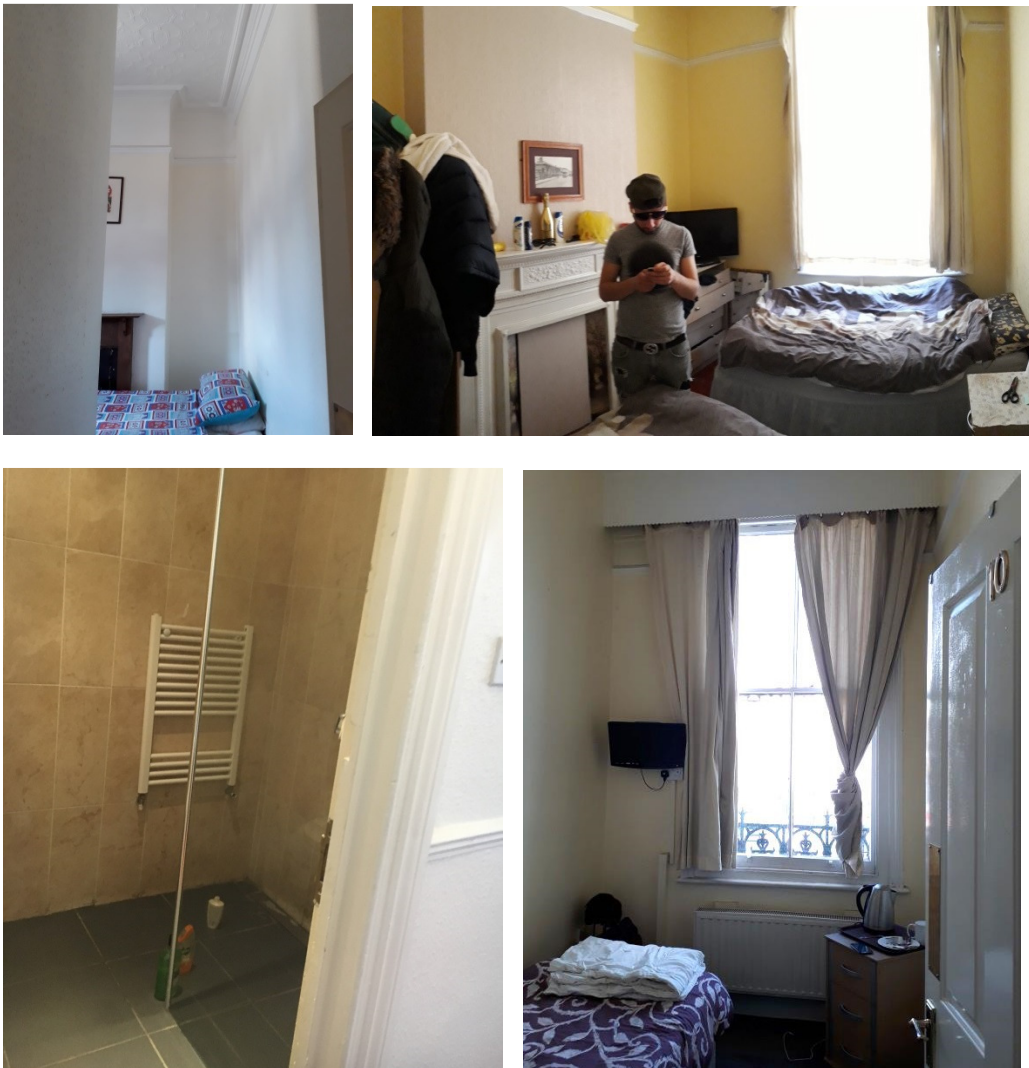


Figure 3.24 – Two historic rooms have been subdivided to create three bedrooms, a hallway and a wet room.

3.43 At the northern end of the building, a further two chimney breasts remain to indicate an arrangement of two rooms in this location (Figure 3.25). Today, these have been

subdivided by modern partitions, to create three bedrooms and a communal wet room; and this has severely compromised legibility of the historic plan form, as well as cutting through an historic ceiling rose within Bedroom 2 (Figure 3.26). The partition wall between Bedrooms 1 and 2 is in the location of an historic partition (as indicated by its location between two chimney breasts), though the fabric itself is thought to be more recent.

3.44 Both Bedrooms 1 and 2 have embossed ceilings and fragmentary cornices (Figure 3.25); whilst Bedroom 9 retains a ceiling rose which has been split by a modern partition between Bedrooms 2 and 3 (Figure 3.26). As at ground floor, this historic fabric is typical of public house decoration in the late-19th century, and its presence here suggests that all of the first floor was historically given over to public use, rather than for residential accommodation.

3.45 As well as remaining historic cornices, skirting, embossed ceilings and floorboards, the doors and architraves to the lounge and office within the manager's apartment also appear to be historic; whilst others are modern but have attempted to replicate a traditional four-panel design.

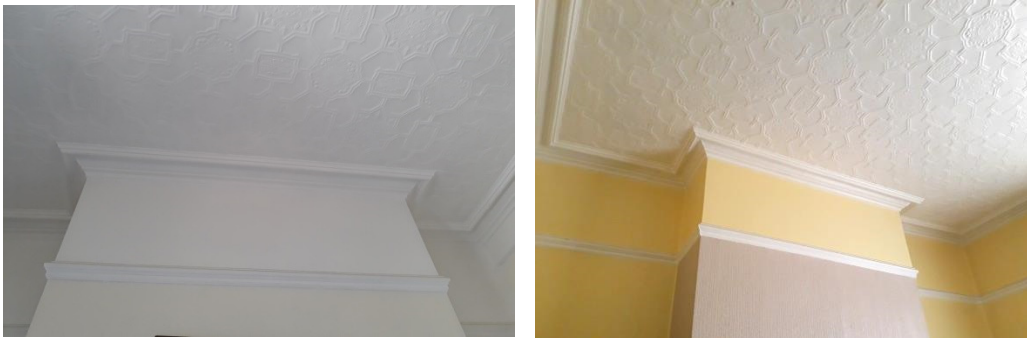


Figure 3.25 – Chimney breasts, cornicing and embossed ceilings within Bedrooms 8 and 9



Figure 3.26 – Ceiling rose within Bedroom 2, split by a modern partition between Bedrooms 2 and 3.

3.46 In summary, some fragmentary historic elements of the first floor have survived, including chimney breasts, cornices and skirting, and embossed ceilings. These elements contribute to the special interest of the listed building, where they provide some evidence of the historic plan form and public function of this floor level as part of the

public house. However, modern interventions as part of the 2005 conversion to hotel use have compromised the historic plan form and architectural character of the first floor, so that today, overall, the internal layout and fabric at this level now makes a more limited contribution to the heritage significance of the listed building.

Second Floor

- 3.47 The second floor is accessed via the original staircase in the heart of the floor plan (Figure 3.27). This level would have been used as residential accommodation for the publican and family, and would necessarily have been more heavily partitioned for this purpose. As a result, it is thought likely that the second floor has lent itself more easily to use as hotel bedrooms, and has been less comprehensively altered than the first floor.



Figure 3.27 – Staircase to second floor level (L), where a central hallway provides access to several bedrooms.

- 3.48 As at first floor level, at the northern end of the floor plan the chimney breasts in Bedrooms 7 and 8 indicate that there were historically two rooms in this location; however, their proportions have now been compromised in order to create Bedroom 9, a hallway and a communal bathroom (Figure 3.28 and 3.29). Again, the partition wall between Bedrooms 7 and 8 is likely to be historic.

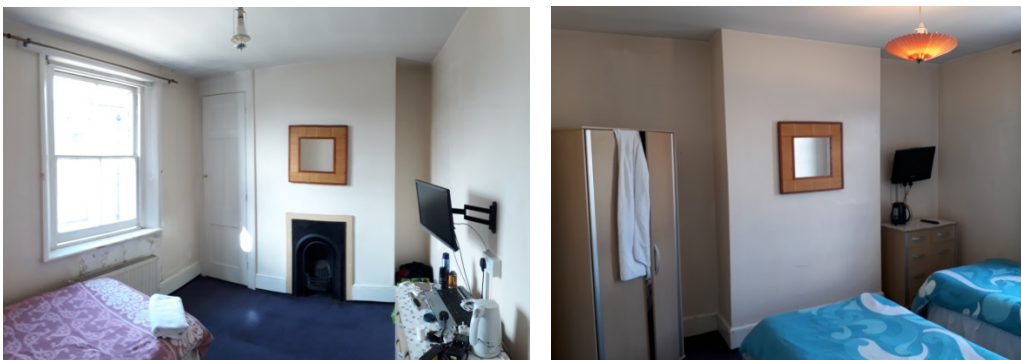


Figure 3.28 – Bedrooms 1 and 2 at second floor.



Figure 3.29 – The historic plan form has been altered at the northern end of the second floor, to create three bedrooms, a hallway and bathroom.

3.49 A central hallway leads to the southern end of the building, and provides access to four bedrooms (Nos.10, 11, 12 and 13), as well as a communal bathroom. Both Bedrooms 10 and 11 have chimney breasts, which suggest that these two spaces were part of the historic floor plan (Figure 3.30). Fire surrounds also survive in these rooms, the design of which is considered to be appropriate to the age of this building, and also the relatively modest status of the second floor level.



Figure 3.30 – Bedroom 10 (L) and 11 (R), each with chimney breasts which indicate that these rooms are part of the historic layout of the second floor.

3.50 Bedroom 10 retains a modest historic cornice and cupboards to either side of the chimney breast, and these features reinforce the likelihood that this room is part of the early second floor layout. Except for Bedroom 10, there is no cornicing at the second

floor. This is in keeping with the lower status of the second floor in the traditional hierarchy through the building; and may indicate that Bedroom 10 comprised the principal living space of the publican's accommodation historically.

- 3.51 Within Bedroom 13, there is a thick portion of wall between the bedroom and the stairwell. This corresponds to a chimney on the rear elevation, and therefore may also be a chimney breast (Figure 3.31).



Figure 3.31 - Chimney corresponding to thick portion of wall within Bedroom 5.

- 3.52 The historic plan form at the southern end of the building is very difficult to discern. The angles of the envelope walls means that the room proportions in this location are somewhat awkward, and so this space could have been used for the more utilitarian, functional role of a kitchen, rather than as a principal living space or bedroom. As found today, modern partitions have been inserted to create an ensuite bathroom for Bedroom 12, and a communal bathroom for the other hotel bedrooms (Figure 3.32).



Figure 3.32 – Bedroom 12 and ensuite bathroom (L), and communal bathroom (R).

- 3.53 Overall, the second floor level of The White Hart is thought to have retained a considerable proportion of its internal plan form; and whilst modern partitions have compromised some of the original rooms, the surviving chimney breasts preserve to

some extent the legibility of these spaces. Some modest decorative fabric has also survived, including cupboards, cornicing, and fire surrounds. The skirting moulding at this level is consistent throughout, but is thought to be a modern replacement given the way that it skirts the proportions of recently-created spaces, such as Bedrooms 7-9.

- 3.54 The surviving layout and traditional, decorative features contribute positively to the historic architectural character of the building, whilst their modest design also highlights the traditional hierarchy of status for floor levels within many buildings, as expressed through the relative levels of decoration. However, in an assessment of the building as a whole, it is nonetheless considered that the plan form and features at second floor level make a more limited contribution to the special interest of the public house, relative to the elaborate front elevation and distinctive pub premises at ground floor level.

Third Floor (Attic)

- 3.55 The attic of The White Hart is accessed via a secondary flight of stairs, which is separate from the historic principal staircase (Figure 3.33). The design of this fixture is appropriate to the age and style of the house, and also the relatively lower status of the attic floor level. This stair provides access to a single attic room, which is extremely plain and unadorned, and makes at best a limited contribution to the significance of the listed building.



Figure 3.33 – The secondary stair to the single room at attic level.

Historic Interest

- 3.56 The White Hart is of special historic interest as a good example of a late-19th century public house, of a type which emerged across London (and England more widely) during this period. It is also an example of the surviving historic, traditional building stock of New Cross, a great deal of which survives in the local area, and around the historic junction of New Cross Road and Queen's Road.
- 3.57 The White Hart is also of historic interest as one example of a great many pubs run by the brewing company Watney, Combe and Reid (and formerly Coombe & Co, prior to being acquired by Watney in 1898, thus forming Watney Combe & Reid). The pub also enjoys some limited association with the architectural firm Eedle and Meyers, which specialised in pub design from the 1880s to 1946. According to a drawing dated 1898,

Eedle and Meyers carried out a phase of alteration to the ground floor of the building at this time. Finally, the pub also enjoys a reasonable level of historic interest through its historic and continuing status as a social landmark within a community, which is often attributed to buildings of this type.

Group Value

- 3.58 By its nature, The White Hart PH stands as an individual building within the townscape, and is conspicuous in the surrounding built form in terms of its use and elaborate decorative design which is easily-recognisable as a public house.
- 3.59 At the same time, the pub forms part of a group of high-quality, mid- to late-19th century commercial buildings that are set around the junction of New Cross Road and Queen's Road, including the chemist, Barclay's Bank and another former bank building to the north of The White Hart (Figure 3.34). These share a richer, more elaborate decorative style and greater scale and massing than other houses and commercial properties within the street scene, and serve to highlight the importance of this location as an historic junction.



Figure 3.34 – The White Hart is one of a group of larger-scale commercial properties set around the road junction

Summary of Significance

- 3.60 The White Hart is of special architectural and historic interest as a high-quality example of a late-19th century public house, of a type which emerged across London (and England more widely) during this period. The pub is also an example of the surviving historic, traditional building stock of New Cross, and forms part of a group of high-quality, mid- to late-19th century commercial buildings that are set around the junction of New Cross

Road and Queen's Road, including the chemist, Barclay's Bank and another former bank building to the north of The White Hart.

- 3.61 The special architectural interest of The White Hart is primarily derived from the historic and architectural character of its principal street elevations, which have undergone some alteration – particularly at ground floor and at parapet level – but are generally well-preserved. Overall, the commercial frontage and upper street elevations are typical of this building type, and display high-quality materials and attractive detailing which help this building to stand out visually in the street scene, thereby reinforcing its role as a landmark within the street and local society. The pub also enjoys historic interest and communal value through its historic and continuing status as a social landmark within a community, which is often attributed to buildings of this type. Its continued use at ground floor as a pub is also of importance, although the upper floors were understood to have been originally predominantly in residential and not hotel use.
- 3.62 The rear elevation of the building is largely concealed from view due to the location of the building plot, and the close proximity of other built form along New Cross Road and Queen's Road. This elevation is of far lower status relative to the principal street frontages, which is reflected in its simpler design and use of materials. It has also been more compromised by later additions and alterations, and consequently makes a more limited contribution to the significance of the listed building, relative to the street frontage. An unauthorised terrace has been constructed at first floor roof level which appears to have been used as a smoking area for patrons of the pub. I am advised that the owners have requested that the tenant removes this and there is an outstanding enforcement investigation in this regard.
- 3.63 The pub at ground floor level makes an important contribution to the special interest of the listed building, where it retains its original use and contributes to the local community as a social venue for leisure and entertainment. The layout at this level is much-altered; however, the survival and restoration of some traditional, high-quality features at The White Hart accumulate to create a pub premises which is distinctive, and which enhances the special interest of the building as a good example of the building type.
- 3.64 The extent of modern intervention to the plan form at first floor level means that as found today, the internal layout now makes a more limited contribution to the heritage significance of the listed building. Some fragmentary historic elements of key features and decorative fabric have survived, and these elements contribute to the special interest of the listed building, where they provide some indication of the historic plan form and public function of this floor level as part of the public house. However, these are patchy and incomplete, and consequently are of lesser interest, relative to the principal elevations and pub premises.
- 3.65 The second floor level of The White Hart is thought to have retained a considerable proportion of its internal plan form, and a scheme of selective opening up works (as proposed) to the existing walls at this level may reveal whether any historic sub-structure remains to clarify / confirm the historic layout. Some decorative fabric has survived, and whilst these contribute to the historic character of the building, they are considered to be fairly modest and ordinary. In an overall assessment of the building, the plan form and features at second floor level are therefore considered to make a more

limited contribution to the special interest of the public house, relative to the elaborate front elevation and distinctive pub premises at ground floor level.

- 3.66 The single attic room is extremely plain and unadorned, and makes at best a limited contribution to the significance of the listed building.

Hatcham Conservation Area

Historical Development

- 3.67 The area of New Cross was historically the manor of Hatcham, and was largely rural in character until developments in infrastructure in the early-19th century led to its rapid development as a suburb of London. It takes its name from the crossroads of the principal east-west route to Camberwell, and other roads between Kent and London.¹⁶
- 3.68 The early history of the conservation area is as part of the manor of Hatcham; a small hamlet with a manor house and a handful of small holdings, which was bought by the Worshipful Company of Haberdashers in 1614.¹⁷ The Haberdasher's Map of 1619 shows that by this early date, the key routes of New Cross Road and Queen's Road had already been established, and that the surrounding landscape was rural, with a mixture of agricultural use and woodland (Figure 3.35).



Figure 3.35 – Haberdasher's Map showing the manor of Hatcham, 1619.¹⁸

- 3.69 Rocque's Map of London dated 1746 that Five Bells Lane (now Hatcham Park Road) was added to the street pattern of the conservation area by this time. The manor house associated with the hamlet had been rebuilt by Joseph Hardcastle in the late-18th century, and was known as Hatcham House. Rocque's map also shows that new built form had also become concentrated around the junction of New Cross Road and Queen's Road, and this indicates the growing importance of this route for trade and transport between London and the west (Figure 3.36).
- 3.70 Indeed, in 1718 a toll gate was built on New Cross Road at the junction with Lewisham Way, which collected tolls from passing travellers to fund the upkeep of the road. The

¹⁶ 'Parishes: Hatcham (Parish of Deptford St Paul)', in *A History of the County of Surrey: Volume 4*, ed. H E Malden (London, 1912), pp. 42-44.

¹⁷ London Borough of Lewisham, *Hatcham Conservation Area Character Appraisal*. 2006.

¹⁸ Ian W. Archer, *The History of the Haberdashers' Company*. 1991.

toll gate was later relocated to the junction with Queen's Road, and this area subsequently became a focal point of the local area (Figure 3.37). Inns such as The White Hart and The Five Bells were built to take advantage of both local residents, and passing tradesmen and travellers, and these buildings became distinctive focal points of active life in the area over subsequent decades.



Figure 3.36 – First series OS Map, 1805, which shows Five Bells Lane, and clusters of small buildings along New Cross Road.



Figure 3.37 – 19th century photograph showing the toll gate on New Cross Road, outside the site of The White Hart PH, at the junction with Queen's Road.

3.71 Aside from this concentration of built form along the principal roads, Hatcham largely remained a rural hamlet, dominated by a market garden industry, well into the 19th century. In 1809, the Croydon Canal was opened between Croydon, and the Grand Surrey Canal at New Cross. Its success was short lived, however, and it was closed in 1839, with much of its cutting re-used by the London & Croydon Railway Company for part of the railway between London Bridge and West Croydon station (Figure 3.38). The advent of railway infrastructure through New Cross catalysed the rapid growth of the area as a suburb of London in the mid-19th century.



Figure 3.38 – Maps of 1820 (L) and 1851 (R) showing the Croydon Canal, later converted for use as part of the railway between London Bridge and West Croydon station.

3.72 London’s population as a whole grew substantially in the 19th century, and railway infrastructure meant that working people could travel easily between the city and surrounding areas, such as Hatcham. The Worshipful Company of Haberdashers, which had owned the manor of Hatcham since the early-17th century, took advantage of this opportunity and began a programme of speculative development on their land. From the 1840s, as leases expired plots of land between the railway and New Cross Road began to be developed as a series of streets with modest terraced housing.¹⁹

3.73 This speculative residential development was focussed along New Cross Road in the first instance, with a mixture of three-storey residential terraces raised over basement, and commercial buildings. Houses quickly followed along Five Bells Lane (renamed at that time to Hatcham Park Road) and Harts Lane, which was newly laid out in the 1860s (Figure 3.39). Between 1873 and 1896, Hatcham House was demolished, and its site and the remainder of the Habadashers’ estate was built up with streets and terraces. The OS map for 1893-6 shows Hatcham Conservation Area largely as it is found today (Figure 3.40).

¹⁹ Ian W. Archer, *The History of the Haberdashers’ Company*. 1991.



Figure 3.39 – 1873 OS map showing the gradual spread of residential streets and terraces on the Haberdashers’ estate between New Cross Road and the railway.



Figure 3.40 – 1893-6 OS map showing Hatcham Conservation Area developed for modest terraced housing.

- 3.74 The streets of the conservation area remained largely unchanged in the early-20th century, and though several terraced rows sustained general blast damage during the Second World War (with some instances of more severe damage or destruction), the area has retained a large proportion of its 19th century residential properties. The boundary of the conservation area has been tightly-drawn to exclude modern development, and its 19th century residential streets and terraces have survived largely unaltered by modern redevelopment.

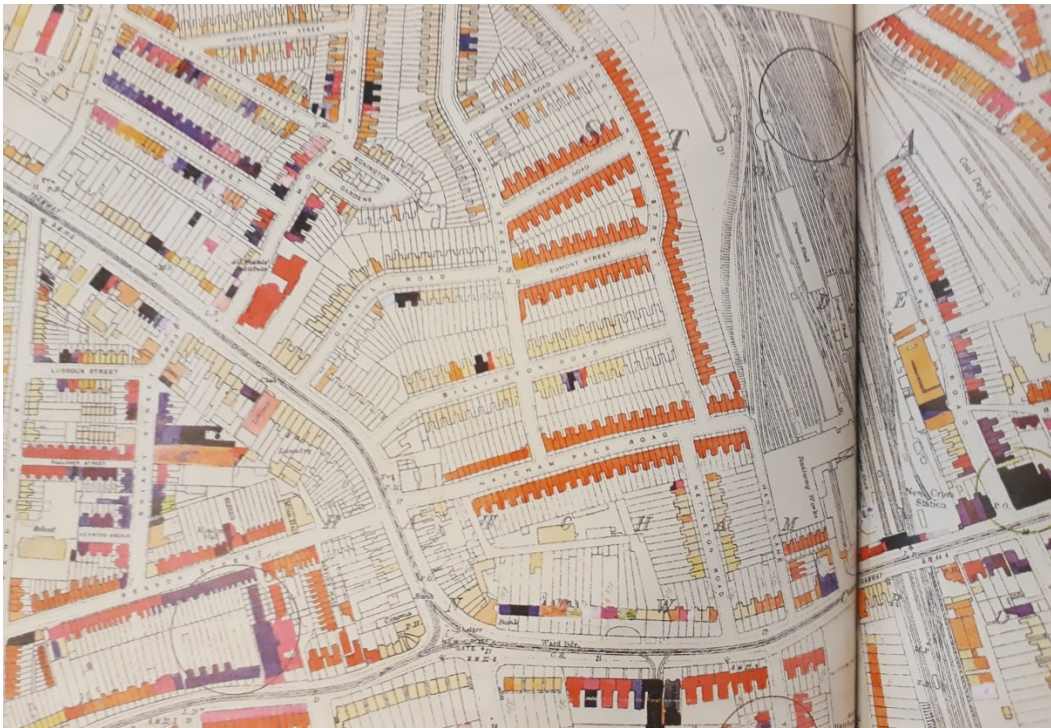


Figure 3.41 – Wartime bomb damage map, showing blast damage to several terraces, and some localised instances of more severe damage or destruction. The White Hart sustained only minor blast damage.

Character and Appearance

- 3.75 The character and appearance of Hatcham Conservation Area is described in detail in the Council's Appraisal document, published in 2006. As the Appraisal identifies, the conservation area can be described in terms of the street scape of New Cross Road and Queen's Road; and of the 19th century residential streets to the north-east of these key routes.

New Cross Road and Queen's Road

- 3.76 New Cross Road and Queen's Road are two of the oldest streets in New Cross. Today, these historic roads today remain the primary traffic routes and contain the bulk of the commercial activity in the area. Some terraced townhouses remain on the north side of New Cross Road, and these grade II listed, Classically-designed buildings represent some of the earliest residential development of the Haberdasher's estate (Nos.209-241 New Cross Road, Figure 3.42). These houses are of a larger scale and more elaborate decorative style than the more modest scale on the network of streets immediately to the north; this, together with their prominent location on a principal thoroughfare, indicates that they were originally intended for higher status occupants.



Figure 3.42 – Victorian townhouses front the north side of New Cross Road.

3.77 The character the conservation area quickly becomes commercial when moving eastwards towards the junction of New Cross Road and Queen’s Road. This was the site of the former toll gate, and is the key focal point within the conservation area, as expressed by a group of large-scale commercial buildings including the chemist, The White Hart PH, Barclay’s Bank and another former bank building (Figure 3.43 and 3.44).



Figure 3.43 – The junction of New Cross Road and Queen’s Road



Figure 3.44 – The key focal point of the conservation area has a frenetic, commercial character.

3.78 Around these important, large-scale High Victorian buildings at the road junction, the built form of Queen's Road and New Cross Road in the conservation area is characterised by 19th century terraced properties, with commercial premises at ground floor and either further commercial or residential accommodation above (Figure 3.45). Some of these were built as houses, and were later extended to the front elevation with commercial premises at the ground floor. The predominance of commercial uses along these roads reflects their long history as principal thoroughfares into the city, where businesses have clustered to take advantage of passing travellers and tradesmen.



Figure 3.45 – Commercial uses line the principal routes of New Cross Road and Queen's Road.

3.79 Aside from the numerous small scale commercial premises, some key buildings include the Five Bells public house on the corner of New Cross Road and Hatcham Park Road; the former library building, as well as All Saint's Church, on New Cross Road close to Casella Road (Figure 3.46).

3.80 The built form in this part of the conservation area is predominantly between three and four storeys, and this height reflects the importance of the principal thoroughfares relative to the more modest scale of development in the surrounding streets. There is a predominant material palette of brick with stucco dressings, and architectural design employs a mixture of Classically-inspired motifs and proportions. The roof scape is

varied, and incorporates many flat parapets, together with more elaborate gables, cornices and pediments to the key, higher-status buildings such as The White Hart PH.



Figure 3.46 – The Five Bells, the former library, and All Saints Church

Nineteenth Century Residential Streets

- 3.81 The residential streets between New Cross Road and the railway to the east of the conservation area were developed over a handful of decades in the mid- to late-19th century, following improvements to railway infrastructure between Croydon and central London (Figure 3.47). The character of this part of the conservation area is overwhelmingly residential, and there is a distinct contrast between the commercial and frenetic character of New Cross Road, and the quiet environment within the domestic streets.
- 3.82 The terraced houses which predominate are modest in their scale, being generally arranged over two or three storeys, with a roofscape largely comprised of flat parapets and some pitches. Of the residential buildings in the conservation area, a considerable proportion has retained the original roof forms (Figure 3.48).



Figure 3.47– This part of the conservation area is characterised by domestic streets and modest terraced houses, and overall the atmosphere is much more calm and quiet than the frenetic nature of New Cross Road.



Figure 3.48 – The residential terraces are generally arranged over two storeys, with a brick materiality and Classically-inspired proportions and detailing.

3.83 Generally, the buildings share a consistent building line, with a repeating rhythm of frontages, set back from the street behind gardens, with brick walls, railings or fences defining the boundary. There is a strong consistency in the overall style of residential building within the conservation area. This cohesive character is achieved through the predominate terraced typology of housing, together with the grid-like layout of streets, the widespread use of stock brick and stucco render, and of Classical architectural features (Figure 3.49). Within this overall of uniformity, differences in the detailed design of the terraces also create a great deal of visual interest within the townscape. The decorative features of the houses demonstrate the Victorian enthusiasm for the lavish use of materials and detailing – even for more modest-status housing.



Figure 3.49 - There is a strong consistency in the overall style of housing within the conservation area; but variety is introduced through the design of individual terraces.

3.84 As well as numerous well-kept garden areas, the conservation area is characterised by a high proportion of street trees, which soften the streetscene and contribute to a verdant suburban environment, particularly when in leaf (Figure 3.50). However, the volume of vehicular parking on the residential streets creates a cluttered appearance to the conservation area, which is detrimental to its character.



Figure 3.50 - The conservation area is characterised by a high proportion of greenery.

Summary of Significance

- 3.85 Hatcham Conservation Area is significant as the core of the historic hamlet of Hatcham, originally a rural village located outside of London. New Cross Road and Queen's Road are key elements of the settlement, where they form part of principal routes between London and the south / west, and have historically been the focal point for building development. The variety of 18th and 19th century buildings along these roads reflects the constant change that has occurred in the conservation area over a long period of time.
- 3.86 The residential streets of the conservation area are also significant as an example of a mid- to late-19th century suburban estate, which was developed following the expansion of the railway network into London. The network of residential streets and terraces illustrates the ambition of the Worshipful Company of Haberdashers, and its speculative builders and designers, in creating the new residential area for the middle or professional classes. They also reflect the expansion and prosperity of mid-19th century Lewisham (and London more widely), as well as the development of new trends in residential planning and changing tastes in domestic architectural styles and use of materials in this period. Significance is derived from the legibility of the original street pattern, as well as the surviving built fabric.

Contribution of The White Hart PH

- 3.87 The White Hart PH is a prominent part of the street scene at the junction of New Cross Road and Queen's Road, due to its relatively large scale, and elaborate decorative frontage (Figure 3.51). The attention to detail in the design of the principal elevations lends the building inherent architectural quality, and contributes to the historic character of the area. The public house forms part of a collection of historic commercial buildings around the junction of New Cross Road and Queen's Road, and historically has acted as a focal point of social activity, thereby contributing positively to the distinctive sense of place in this part of Lewisham.



Figure 3.51 – The White Hart PH is a prominent part of the street scene at the junction of New Cross Road and Queens Road

4. Application Proposals and Heritage Impact Assessment

Introduction

- 4.1 The designated heritage assets which would be affected by the application proposals (listed building and conservation area) have been properly identified and their heritage significance described as part of this report, in **Sections 2-3**.
- 4.2 The relevant heritage legislation, policy and guidance are also set out in full in **Appendix 3**. This includes the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF 2019 and supported by the NPPG, and other relevant local policy and guidance for change within the historic environment.
- 4.3 Together, these sections and appendices provide the appropriate context for the consideration of these newly revised application proposals by the local planning authority.

Planning History and Application Proposals

- 4.4 The recent planning history for this Site is particularly relevant to the consideration of this new application for works of alteration to the listed building.
- 4.5 Listed Building Consent was approved at Planning Committee on 1 August 2019 (LBL reference DC/18/106611), following a recommendation to approve by officers. The Decision Notice was issued on 8 August 2019. The description of proposed works is:

"Listed building consent for alterations in connection with the conversion of the upper floors of No 184 New Cross Road, SE14, into 2 one bedroom, self-contained flats, a two bedroomed self-contained flat and a one bedroomed self-contained maisonette with study, together with the reconfiguration and retention of the existing public house at ground and basement level and the provision of two lantern lights to the flat roof at the rear of the existing public house"

- 4.6 In tandem an application for Planning Permission for the related proposed development and works on this Site (LBL reference DC/18/106613) was submitted by our Client. Officers recommended that the Council refuse this application for planning permission. The Planning Committee then considered and confirmed their decision to refuse the application at their public meeting on 1 August 2019, whereby one reason for refusal was given. 'Reason 1' sets out that:

"1. The proposed conversion of the upper floors to residential use, by virtue of the restrictions imposed by the building's statutory listing which limit the maximum noise attenuation that can be achieved, would result in unacceptable living conditions for future residents, in terms of noise and vibration, that cannot be mitigated by conditions as any such conditions would amount to unreasonable restrictions on the use of the pub which is of a unique and intrinsic character that caters to a diverse clientele and contributes materially to the economic, social and cultural lives of local residents and

the late night economy and culture of New Cross, contrary to the NPPF (2019), NPPG, Policies 3.1, 4.6, 4.8 and 7.15 of the London Plan (2016), Policies GG1, HC5, HC6, HC7, D1, D12 and D13 of the draft London Plan (2019), Objective 5 and Policy 19 of the Core Strategy (2011), Policies 20, 26 and 43 of the Development Management Local Plan (2014) and the provisions of the Culture & the Night-Time Economy SPG (2017)."

- 4.7 An appeal against the refusal of Planning Permission was made to the Secretary of State (Planning Inspectorate) on the 14 November 2019.
- 4.8 The new application for Listed Building Consent relates to a revised scheme that is in most part closely comparable to that previously approved. In summary, these proposals comprise the conversion of the upper levels of the public house to residential use (4no. self-contained apartments), together with associated internal and external alterations to the plan form and later extensions. The existing pub at ground and basement level will be retained. As a consequence of the residential conversion to the upper floors, the pub's kitchen will be relocated to basement level, with some associated, minor plan form alterations. At the ground floor level, the application proposals include the creation of a residential entrance; the replacement of the modern bathroom facilities at the rear of the public house; and the installation of a new pillar and chimney breast.
- 4.9 The key differences between these schemes relate to the introduction of additional physical measures to mitigate noise propagating to the upper floors.
- 4.10 It is also important to note that during the period of the determination of the previous Listed Building Consent application revisions were made to the scheme. These included a change to retain and adapt the existing secondary staircase between second and third (attic) floor levels internally.
- 4.11 The new scheme proposals are detailed in full in the drawings package (and previously submitted Design & Access Statement) prepared by the scheme architects Kruszelnicki Leech. In addition, this Heritage Statement should also be read in conjunction with the new Planning Cover Letter (and previously submitted Planning Statement) prepared by Boyer.

Heritage Impact Assessment

- 4.12 These proposals will have a direct impact on the significance of the grade II listed building, and also the surrounding conservation area. This section below sets out a review of the proposed works, including how they would likely affect the significance of both of these heritage assets in terms of their architectural and historic interest, or character and appearance.
- 4.13 Drawing this analysis together, the proposals are then assessed in terms of their compliance with the relevant statutory duties of the Planning Act 1990, national policy within the NPPF 2019 and supporting NPPG, and regional and local planning policy and guidance for change within the historic environment.

Change of Use

- 4.14 This application again supports a return of the upper levels of the listed building from the current use as a hotel, back to residential use. This change will reinstate the original

use by which the upper levels were predominantly occupied in the 19th century (as accommodation for the Publican and family; though some of the rooms at first floor level were also in use for the public as part of the commercial premises). Meanwhile, the public house at ground floor and basement level will be retained as a viable premises.

- 4.15 It is generally accepted that in the majority of cases the most appropriate use for a listed building is its original use. The proposed change of use will accord with the historic domestic use of the upper levels of the listed building, and represents a heritage benefit that will enhance and better reveal its significance.
- 4.16 The proposed adaptive changes to the building's exterior and internal spaces, flow from the proposed reinstatement of its original residential use, and will create four high-quality apartments; whilst also retaining or reinstating historic plan form or features within the building wherever possible.

External Alterations

Front Elevation

- 4.17 The existing entrance to the hotel is in the location of an original doorway into the public house, but now comprises a modern, poor quality door and surround which do not reflect the architectural character and quality of the building. Meanwhile, the adjacent door opening is set back from the elevation where there was historically a large window, and is also of limited quality. The application proposals seek to remedy these past, unsympathetic alterations to the door openings on the front elevation overlooking New Cross Road (Figure 4.1).



Figure 4.1 – Proposed front elevation, with relevant entrance doors highlighted

- 4.18 A double-leaf door will be installed in the location of the original door opening, of a design to match the surviving historic doors along the rest of the ground floor frontage. This will reinstate an historic feature of the building, and revert it closer to its original design and appearance. The adjacent doorway will be brought forwards to sit flush with the rest of the elevation, and a simple, high-quality door with side lights will be installed, to be used as the entrance for the residential units at the upper floor levels. The side lights have been measured to correspond to the bottom of the surviving windows in this elevation, in reference to the window which was previously in this location.

- 4.19 This aspect of the proposals will return the principal elevation of the listed building closer to its original appearance, and will improve its appearance in key views from the wide junction of New Cross Road and Queens Road; thereby enhancing both the significance of the building itself, and its contribution to the character and appearance of the surrounding Hatcham Conservation Area. This is a heritage benefit.

Rear Elevation

- 4.20 At the rear of the building, the proposed scheme seeks the opportunity to rationalise the existing clutter of ventilation flues; and also to implement alterations to the fenestration to reinstate historic openings, and install window frames of a design more appropriate to the age and style of the building (Figure 4.2).



Figure 4.2 – Proposed rear elevation, with an improved flue arrangement, and sympathetic window alterations

- 4.21 There are two metal flues attached to the rear of the public house, which serve the pub's kitchen that is currently located in the rear extension at first floor level. The kitchen will be relocated to basement level as part of these proposals, and accordingly there is now no need to retain the flues, which will be removed. Simultaneously, it is proposed to install a new, smaller flue on the northern side of the elevation, to serve the relocated kitchen (discussed again as part of the internal alterations below). This will be a narrow, straight flue which will not extend above the existing chimney at roof level. Overall, these alterations will rationalise the services on the rear elevation, so that the expanse of historic brickwork is not interrupted by modern, utilitarian interventions. This is a heritage benefit.
- 4.22 With regard to the fenestration pattern on the rear elevation, three modern door openings at first and second floor level will be reduced in size to form windows, which will match the proportion of other existing, historic openings. In addition, timber sash-and-case windows will be installed to several windows (including the former-door openings), in order to remedy existing, poor-quality timber and uPVC installations. These alterations to the windows in the rear elevation are sympathetic to the character of the building, and will return it closer to its original appearance.
- 4.23 Works to the rear of the building also include the removal of a small window in the pitched stair extension; a second small window in the side of the later rear extension; and finally, a small, sloped roof light above the first floor rear extension. Each of these

elements is part of either a later or modern addition to the listed building, which make no contribution to its special architectural and historic interest. As such, these proposals will have no impact on the overall significance of the building.

- 4.24 Finally, permission is sought to widen an existing access door to the roof at third floor level in the northern elevation, to create a set of French doors, and provide access to a small terrace. In views of the rear elevation and from roof level, it is clear from the new brickwork and modern asphalt covering that this element of the building has been reconstructed in recent years; possibly following the bomb damage the building sustained during the Second World War. As a result, this alteration would not affect any historic fabric. Meanwhile, the high-level elevation is concealed in views of the listed building, and the new doors will not affect its architectural interest, or its contribution to the character and appearance of the surrounding conservation area.

Internal Alterations

Basement

- 4.25 As previously mentioned, approval is again sought to relocate the pub's kitchen from the rear extension at first floor level, to the basement. This will facilitate the conversion of the upper levels to residential use (Figure 4.3). As part of the revised scheme the working kitchen spaces have been reconfigured again to improve and expand these facilities in support of the continuing public house use at ground floor.



Figure 4.3 – Existing (L) and proposed (R) basement floor plans

- 4.26 Some relatively minor plan form alterations are proposed at this level within the existing office and storage areas. Partitioning will be removed at basement level, to create two larger rooms that would then be interconnected by the removal of sections of the existing dividing brick wall; all to enable the installation of a sufficiently large working kitchen. The inner partition between the office or storage rooms is not considered to be historic or of any particular interest in heritage terms, and so this removal will not affect the significance of the listed building. The main lateral division between these two

spaces would be retained in the most part and where new openings created in the brickwork the use of nibs, a pillar and downstands would ensure the previous plan form layout remains clearly legible. Again the impact of this change on the particular significance of the building as a whole would be limited.

- 4.27 The small section of wall between the stair hall and the large storage room would be removed, and replaced with new partitions to create a larger hallway and circulation space at the foot of the stairs. Whilst these works would include the removal of small sections of historic brickwork, this is considered to be very minor. As a result, these modest alterations would not impact the particular significance of the listed building adversely.
- 4.28 Internally, the kitchen would also require the installation of a flue through the floor structure between ground and first floor level, and subsequently through the roof form of the rear addition. As established in **Section 3**, this part of the building is a late-19th century addition which makes a more modest contribution to its heritage significance; whilst the required removal of fabric would be minimal. Given this understanding of the building and its historical development, this aspect of the proposals would not affect its significance overall.

Ground Floor

- 4.29 As established in **Section 3**, modern partitions have been inserted within the pub premises at ground floor, to create an entrance lobby and a narrow corridor, which provide access to the hotel accommodation at first floor level. These partitions are set at an awkward angle, and have compromised the original extent of the pub premises. The narrow sliver of space left at the northern end of the plan form is also put to poor use. At the rear of the premises, there is a modern staircase leading to the existing roof terrace.

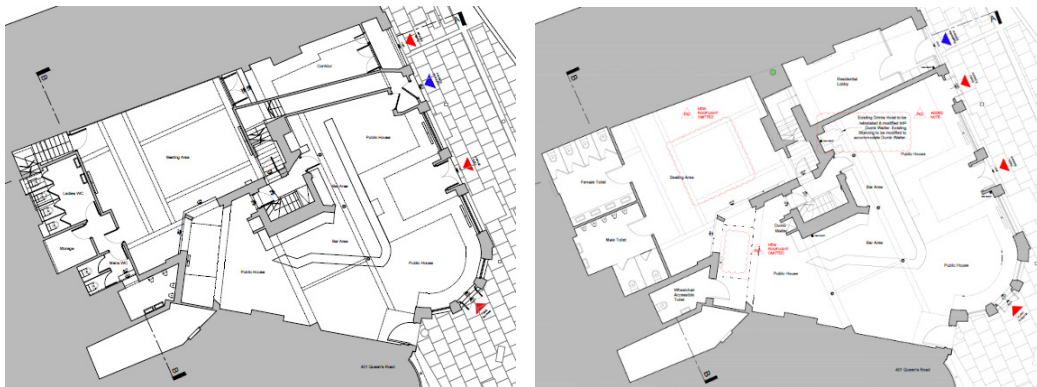


Figure 4.4 - Existing (L) and proposed (R) ground floor plans with relevant areas outlined in red

- 4.30 As part of this application, again the existing entrance lobby and corridor partitions will be removed, and a new partition inserted to create a residential entrance on the northern side of the building (Figure 4.4). This revised layout represents a considerable improvement to the existing, inefficient and poor-quality arrangement; as well as that which was proposed at pre-application stage, in which the incorporation of cycle and bin storage for the proposed flats encroached further on the commercial premises.

- 4.31 Instead, the finalised design will have the effect of returning floor space to the commercial premises; and this will correspond with the reinstatement of a traditional pub door to the external elevation (described previously as part of the external alterations). The narrow sliver of floor space will be incorporated as a meaningful space for the residential entrance. A fire surround will also be reinstated to the surviving chimney breast within this entrance, to a design which will be appropriate to the age, style and use of the building at this level. The awkward angle of the existing wall adjacent to the bar will be remedied.
- 4.32 The application proposals also seek to remove the modern staircase at the rear of the property (in tandem with the cessation of the roof's use as a public terrace), and the existing, modern partitions of the pub's bathrooms. New bathrooms will be installed in this location, of a higher quality and improved layout. This will not impact on any historic fabric or any element which contributes to the significance of the listed building, which will therefore be preserved.
- 4.33 Proposals also include the reinstatement of a chimney breast (non-functional) within the rear room, which would be set against the staircase partition, as close as possible to the location of an historic fireplace shown in the 1898 ground floor plan. In this way, the proposals will deliver a heritage benefit by returning an historic feature to the traditional public house, and returning the plan form at this level closer to its original layout. A new pillar would also be installed in the bar area, of a design that will match the existing bar pillars, in sympathy to the character of the pub interior.
- 4.34 As part of this revised scheme, approval is no longer being sought for the installation of two rooflights within the roof of the later rear extension. This change is linked to additional physical mitigation measures to control noise transmission.
- 4.35 In summary, the alterations to the plan form at ground floor level will enable a more efficient use of the floor space; and will allow for the continued viable functioning of the commercial premises, as well as the creation of a better quality residential entrance, and bathroom facilities. Overall, the significance of the listed building would be enhanced by a number of beneficial alterations that are proposed.

First Floor

- 4.36 In seeking to preserve those elements of historic plan form and features which survive at first floor level, this application scheme again presents a considerable revision to the design proposed earlier at pre-application stage. In principle these proposals will return the first floor closer to its original 19th century plan form, and which will better reveal the surviving historic features at this level. This is a heritage benefit.
- 4.37 As found today, the original staircase between ground and first floors has been removed, so that the modern stair is now the only internal access to the upper floors of the listed building. The first floor is in use as hotel rooms and a communal bathroom, together with the hotel manager's apartment, and the pub's kitchen. This level has been heavily partitioned to accommodate these functions, and the historic plan form is now difficult to discern due to the extent of alteration; however, some historic features and fabric remain to give a broad indication of the historic plan form.

- 4.38 The principal motivation for the proposed alterations is the conversion of the upper floor levels of the building to residential use. At first floor, there will be 1no. 1 bed apartment, and 1no. 2 bed apartment. These application proposals have been refined and revised since pre-application, using an understanding of the building's historical development and architectural interest, to deliver a high-standard of residential accommodation, and also to retain or reveal as much historic plan form and features as reasonably possible (Figure 4.5).

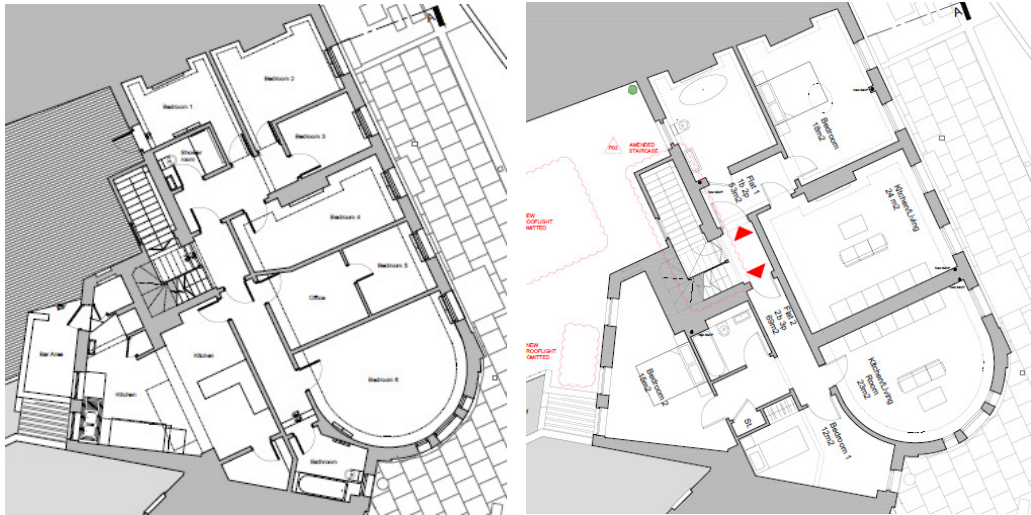


Figure 4.5 - Existing (L) and proposed (R) first floor plans, showing the return of this floor level closer to its original layout, with more significant alterations concentrated at the already much-altered and compromised rear

- 4.39 Flat 1 will be accessed via an existing door opening. The modern partitions of the existing shower room will be removed, and this will open up the plan form of Bedroom 1 to bring the proportions of this space closer to the original layout. Similarly, the partitions forming Bedroom 3 will be removed, to reinstate the original proportions of the adjacent room. In short, these changes will improve the legibility of the historic layout of two rooms at the northern end of the building, which represents an enhancement to the architectural character of the listed building, and a heritage benefit.
- 4.40 In addition, the embossed ceilings in these rooms, which are so evocative of the building's original use, will be retained and made-good. The two halves of the surviving ceiling rose (currently bisected by a modern partition) will also be reunited as a single feature within the flat's bedroom.
- 4.41 Flat 2 will also be accessed via an existing doorway, leading to the central hallway which will be preserved as part of the layout of this apartment. Permission is sought to remove the small section of wall from between the existing bathroom and kitchen store cupboard, to create a single bedroom. New partitions would also be inserted at the rear of the building, to create a bathroom and store cupboard, and a hallway leading to the double bedroom at the back of the building. As established in **Section 3**, the historic plan for at the rear of the building at first floor level has been compromised by past alterations, so that its original layout is no longer discernible. Given the level of change, this part of the floor plan now makes a limited contribution to the significance of the listed building. Using this understanding, alterations are focussed in this less-sensitive

area of the floor plan; thereby enabling the delivery of enhancements elsewhere, where fragments of the historic floor plan and features survive.

- 4.42 A partition will also be inserted to separate the new bathroom and single bedroom from the double bedroom within the later rear extension. This will be located in the position of an existing down-stand across the kitchen ceiling, which indicates the location of the original rear elevation. Construction of a wall in this location will reinstate some legibility of the original extent of the listed building internally, which is a heritage benefit.
- 4.43 Modern walls have fragmented the original large room at the front of the building at first floor level. These application proposals seek to remove these unsympathetic partitions, and insert a single wall to divide the space into two combined kitchen / living rooms; one for each apartment. Each space will be accessed via existing door openings. The replacement of numerous modern partitions with a single dividing wall will rationalise the proportions of this space; return the first floor closer to its original layout; and, overall, will better reveal the significance of the listed building, and the role of this space as a single room for public use as part of the commercial premises below.
- 4.44 A cornice survives at first floor level, outlining the original layout of the single, large room at the front of the building. This historic feature will be repaired and made-good where it has been damaged by the installation of modern partitions. Meanwhile, the new dividing wall has been designed so that it will skim the retained cornice rather than cutting through it; to ensure that this alteration will be reversible in the future. In addition, the new wall will incorporate a shadow gap at the junctions with the outer walls and ceiling. These discreet gaps will give the subtle impression that the partition falls short of the full extent and proportions of the room. Though the proposals continue to divide the original large room, this attention to detail in the design of the new partition seeks an honest approach to change, to ensure that the new wall appears clearly differentiable as a later installation within a once-larger space.
- 4.45 We now turn to consideration of acoustic attenuation measures proposed in relation to the new mix of uses on Site (public house at ground floor and residential above). It is noted that as part of the previous application submission a Noise Impact Assessment (NIA) (second version) was prepared by KP Acoustics in January 2019, which included an assessment of both external noise break-in and internal noise transference. With regard to acoustic attenuation measures this NIA made the following recommendations:
- Installation of sound insulation beneath the floorboards between the first floor and ground floor, to enable the retention of the existing floorboards;
 - The installation of secondary glazing to be installed a minimum of 80mm away from the existing windows to achieve a maximum internal noise level of 45dB(A); and
 - Not to create the proposed rooflights in the flat roof at the rear for which listed building consent has been granted.
- 4.46 In response to the refusal of Planning Permission for the related development for the conversion scheme, KP Acoustics were asked to consider what measures could be introduced which would enable the pub to continue to operate after 11pm which would

be consistent with the current and the proposed use of the upper floors. These further investigations inform the design of further physical and management measures within the building to maximise acoustic insulation and noise attenuation. This work has also been guided by inputs from architectural and structural / engineering professionals as part of the design team. The related omission of the previously proposed rooflights to the rear area is noted to be a matter of indifference in heritage terms.

4.47 A Technical Note was prepared by KP Acoustics dated 24 January 2020, which has been shared with the LPA and Planning Inspectorate as part of the pending appeal process. Three alternative Options, or mitigation measures, in addition to the original proposals were put forward representing varying degrees of noise attenuation, and also each presenting different physical impacts on the significance of the listed building. Following that study, a variation of Option 2 is now presented as the preferred option, and so as part of this revised application submission.

4.48 As advised by KP Acoustics, the physical measures allied to the preferred approach, and variation to the previous Option 2, comprise:

- Temporary removal of the existing floorboards to allow the joist void to be cleared of debris and the installation of 150mm mineral wool insulation (density 60kg/m³);
- Reinstallation of the existing floorboards direct to the joists;
- Installation of 2x20mm cementitious boards on top of the floorboards;
- Installation of a new batten/cradle system, or resilient timber battens, to create a void of approx. 65mm, with 50mm mineral wool insulation (density 60kg/m³) installed within the void; and
- Installation of 2x20mm cementitious boards fixed to the new batten/cradle system, which would accommodate any new walking surface within the first floor.

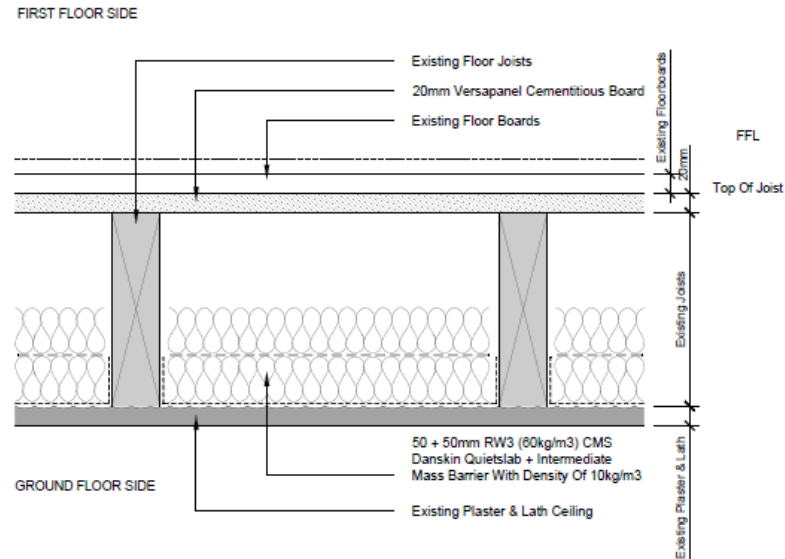
4.49 Also to clarify, the design changes to the previously proposed Option 2 for this scheme at application are as follows:

- Retention of the original floorboards (after the temporary removal to allow the joist void to be cleared of debris and the installation of 150mm mineral wool insulation). These will be re-fixed to the joists and new boards laid atop to preserve that existing in situ;
- Reduction of the timber batten system from 85mm to 65mm to allow the reinstallation of the floorboards with no change in overall build up (assuming that the floorboards are approx. 20mm); and
- Reduction of the mineral wool proposed between the timber battens from 75mm to 50mm.

4.50 Strengthening of the existing first floor structure may also be required to support these physical acoustic attenuation measures.

- 4.51 In addition, the management measures that would also be introduced into the operation of the pub are of no consequence in heritage terms.
- 4.52 It should be noted that this option focuses on measures to the first floor level only and avoids change to the more historically important pub ceiling at ground floor level below. This demonstrates a properly informed, well-considered and sensitive approach to change to this historic building, whilst reconciling the management of the pub use alongside new residential accommodation to the upper floors.
- 4.53 Section 3, has established that internally it is at ground floor level that the special interest of this building can best be understood and appreciated, with regard to the past and continuing use as a pub and some associated traditional features within this public area. Although later extended to the rear and also substantially altered within the main bar area, remnants of the historic layout and design remain to maintain a distinctive traditional pub character at this level. This includes some historic, or more modern but still traditional, decorative features at ceiling level such as fragmentary coricing, panelled beams, capitals to supporting columns behind the bar etc. Alternative proposals to introduce a new layer / suspended ceiling below the existing ceiling treatment within the ground floor pub area, or alternatively to remove and replace that ceiling as existing, would have a markedly greater and adverse impact on the particular significance of this listed building.
- 4.54 As further context, at first floor level above there is evidence of even more substantial past alteration to the historic plan form and decorative treatment, and also the legibility of the function of this level in association with the public area below has been greatly diminished. The contribution of the elements / area of the first floor level of the listed building to its overall significance is therefore more limited relative to the ground floor and main bar area below. And also much lesser again in terms of heritage significance relative to the more historically and architecturally important and intact exteriors to the street.
- 4.55 Overall it is our assessment that the physical measures proposed for this scheme would in isolation result in a degree of harm to the significance of the listed building as a result of the alteration to and or part obscuring of some existing historic fabric and features, and also a change to the character and proportions of rooms and spaces, at first floor level. Such harm to the significance of the listed building as a whole would overall be relatively minor, and at the lower end of the scale of less than substantial as defined by the NPPF (paragraph 196).
- 4.56 These measures would introduce a greater height in the build-up of the first floor level over that existing (160mm above the existing joists, albeit also including replacing / reinstating the existing floor build up) – **Figure 4.7**. This intervention would have a visual and experiential impact on the proportions of rooms and spaces at this level, and also a physical and visual impact on existing fabric / features. This would result in the obscuring, or alternatively removing, lifting and repositioning, of a lower section of the existing painted joinery skirtings within the rooms and spaces that would be reconfigured as part of the proposed and consented scheme of works. Part of the joinery (and newel post) to the original main central staircase would also be obscured at floor level, the bottom of 5no retained door architraves would be obscured or alternatively cut, and 3no historic

fireplaces (hearths and bottom of surrounds) would be built up around. Existing doors within retained doorways would be shaved at the bottom to reduce their height accordingly, or alternatively remade to a traditional design and proportion to suit the new layout, although all of these existing painted timber doors appear to be modern albeit traditionally designed. Work could also include door heightening and cutting out to be required to allow for safe access through openings.



PLANNING STAGE PROPOSAL

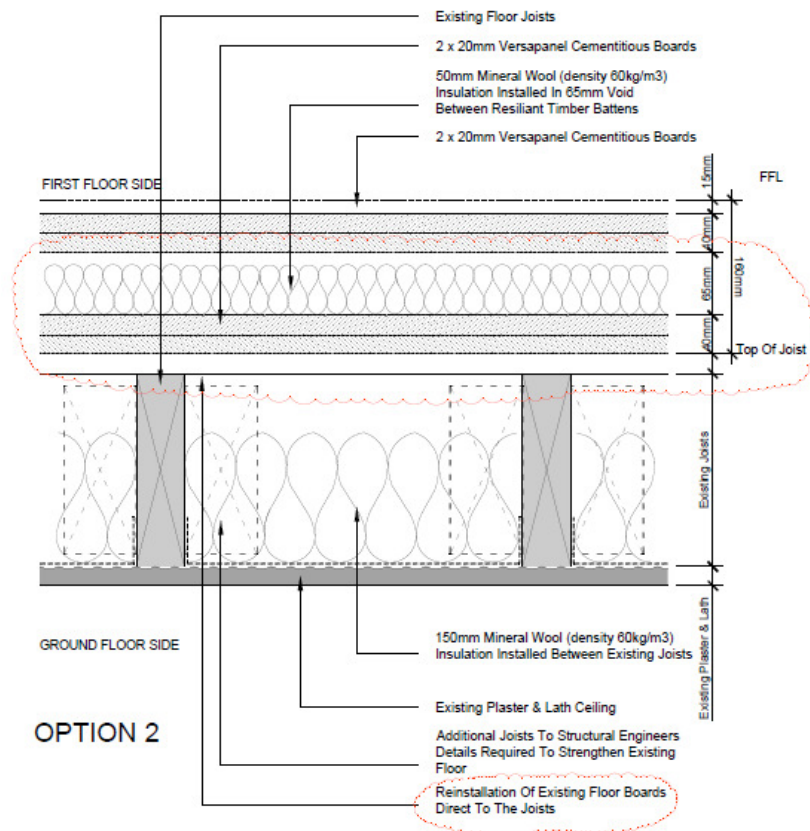


Figure 4.7 – Approved LBC 2019 (top) and newly revised proposed scheme (bottom – Option 2 as revised) physical attenuation measures first floor section

4.57 On-site survey has identified that as found today there appears to exist a mix of some historic, but also more modern but traditionally designed, decorative features at first floor level. This is reflective of the substantially altered condition of this area of the listed building from that original, and also further reduces its sensitivity to further change in heritage terms. Also, in order to introduce a continuous barrier and new layer above the existing floor level, the bottom of the proposed retained internal wall partitions would be cut. Again I identify that these elements at first floor are not intact as original but a mix of historic and more modern new or replacement divisions.

4.58 Overall, the proposed floor build-up to achieve noise attenuation has been designed where possible and appropriate to retain the remaining historic fabric and features at first floor level that contribute to heritage significance (such as the reuse of existing floorboards). Where possible, the principal of reversibility has also been considered as part of the design process, and the new floor build-up would be a new installation that would potentially be able to be removed at a future date (if required) in order to reinstate the existing floor to ceiling height and decorative features.

Second Floor

4.59 At second floor there will be 2no. 1 bed apartments (Figure 4.8). Flat 3 will utilise the existing Bedrooms 7-10. An entrance door will be created on the stair landing, leading to a hallway formed of the existing landing and hall at the northern end of the building, with a small built-in closet. Overall, these are only relatively minor alterations to the plan form, which are reversible, and which will not affect the significance of the listed building overall.



Figure 4.8 - Existing (L) and proposed (R) second floor plans

4.60 As part of Flat 3, a new opening will be created into the central room at the front of the house, and this space will be converted for use as a living room. This new use is in keeping with the historic role of this room, which is likely to have been used as the principal living space of the publican's accommodation. The new doorway will require the removal of a small amount of historic fabric; however, as previously established, the layout and fabric at this level is modest and ordinary, and makes only a limited contribution to the special interest of the public house. As such, this minor removal will

not impact the overall significance of the building; but will enable the use of these rooms as a single apartment with only limited further alterations to the plan form. Within the new living room, the surviving modest historic cornice and cupboards to either side of the chimney breast will be preserved as characterful features of this historic building.

- 4.61 A small section of the existing shower room partition will be removed, to merge this space as part of the new bedroom. This represents a slight improvement to the historic plan form of the listed building, where a modern wall will be removed to reveal the original length of the historic room. Meanwhile, the existing layout at the front of the house will remain unchanged, and these spaces converted for use as a bathroom and kitchen.
- 4.62 Existing partitions to the bedrooms at the rear of the building will be removed, and this space reconfigured to create a hallway, bathroom, bedroom and ancillary storage. At the southern end of the floor plan, the distinctive curve of the envelope wall will be continued internally to enlarge the kitchen / living room. Finally, a new secondary stair will be installed, leading to a study at third floor level.
- 4.63 Relative to the previously proposals, the proposed layout of Flat 4 for the revised scheme has been reconfigured so as to no longer require the loss of the existing historic secondary staircase up to attic level. This historic stair would otherwise be retained on site and adapted for reuse in a new position to continue connecting to the attic level. This change would also avoid or otherwise limit previously proposed reconfiguration of historic and modern partitions, together with a removal of a section of ceiling, in this location in order to allow the installation of a new staircase position.
- 4.64 It was actually during the previous Listed Building Consent application determination period that revisions were made to the design of the scheme in direct response to comments from Council officers and also the notified HE inspector. The existing secondary staircase between second and third floor levels would be retained and reused rather than being replaced. It has been our assessment that this staircase is an historic joinery element in terms of its age within the building, albeit of low relative heritage significance in light of its modest and standardised or ordinary quality, and also its location within an area of the building of low status historically. It was following this revision that HE confirmed in writing that they would withdraw their objection to the scheme (letter dated 2 October 2018). This revision to the scheme design indicates that its impacts on heritage significance was further reduced during the previous application period, and in particular such a potentially harmful change avoided or mitigated²⁰.
- 4.65 Overall, these works have been well-considered in light of a thorough understanding of the building, and the relative contribution of different external and internal elements to its heritage significance. As a result, the proposals are deliberately concentrated at the southern end / rear of the second floor level, because in an overall assessment of the building, this is an historically less-important floor level; whilst the plan form in this location is clumsier and more altered than elsewhere; and the existing decorative fabric

²⁰ Note that Condition 3 of the approved Listed Building Consent relates to the works of alteration to the secondary staircase between the second and third (attic) floor levels. However, during the course of the application determination the scheme design was revised to omit previous proposals to remove / rebuild this staircase and instead to retain and adapt it in-situ

is largely modern. This part of the building therefore makes a limited contribution to the special interest of the public house, relative to the elaborate front elevation; the distinctive pub premises at ground floor level; the surviving plan form and features at first floor; and the regularly-proportioned rooms at the front / northern end of the second floor, with surviving chimney breasts.

- 4.66 The proposed arrangement will deliver the optimum in terms of residential floor space and, as described above, will confine impact to the less important or sensitive areas of the building. This is true at the second floor level, and also throughout the building.

Third Floor

- 4.67 The new position of the secondary staircase within Flat 4 would lead to a large study at third floor level (Figure 4.9). The existing stair void will be covered over, and this space used as a single large room. The French doors in the northern elevation have been described previously, as part of the review of external works above.

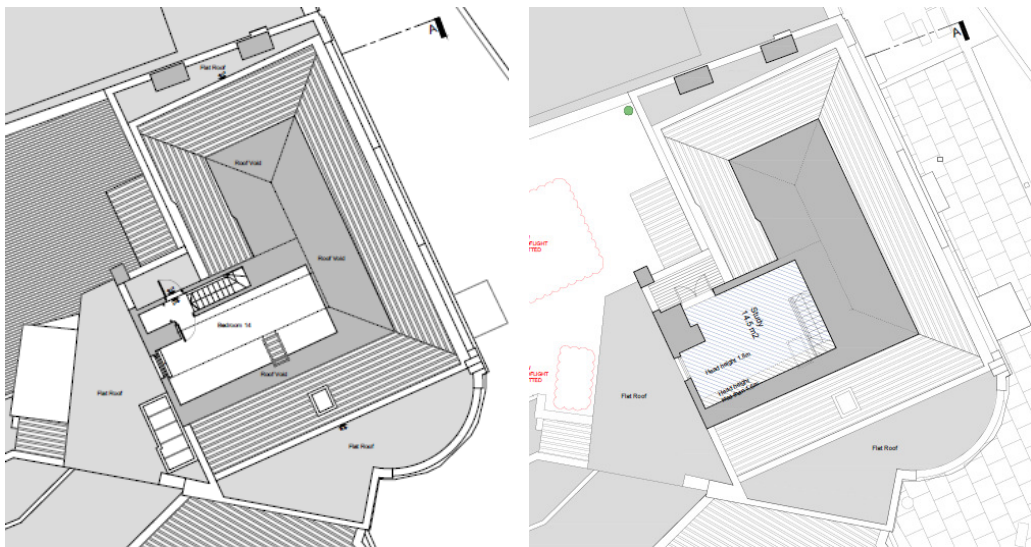


Figure 4.9 - Existing (L) and proposed (R) third floor plans

Summary

- 4.68 In summary, these final application proposals have been closely-informed by our professional heritage analysis and input. Taking account of the relevant and wider considerations of heritage significance, sensitivity and also the potential benefits to be delivered, it is assessed that these application proposals would overall both preserve and enhance both the significance of the listed building, and also its contribution to the surrounding Hatcham Conservation Area.

Review of Heritage Legislation, Policy and Guidance

4.69 It should be noted that the recent decision by the LPA to approve the closely comparable application for Listed Building Consent (LBL reference DC/18/106611) for works of alteration on Site confirms that the special interest of the listed building would be preserved, as required by the relevant statutory duties and also planning policy.

4.70 Importantly, the Officer's Report to Planning Committee (relating to both tandem Planning Permission and Listed Building Consent applications) dated 1 August 2019 set out its conclusions with regard to the impact on heritage assets at section 7.3.4. Stating that:

"Therefore, it is considered that the proposals to alter the listed structure and facilitate the historic use as residential, as well as the improvements provided in terms of the historic understanding of the plan form, would enhance the significance of the building. The proposal is therefore compliant with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 16 of the NPPF and DM Policy 36. This is a planning merit to which significant weight is attached." (section 7.3.4 paragraph 118).

4.71 Our underlining is used to emphasise our shared assessment with the officer that the significance of the listed building would be both sustained and enhanced by this scheme of works (as now approved). And that this represents the delivery of significant heritage benefit(s) (as well as a public benefit for the purposes of the NPPF).

4.72 On this basis the revised scheme now at application is reviewed against the relevant legislation and planning policy for change affecting heritage assets, with a particular focus on those areas of difference to that previously approved.

Review against relevant Statutory Duties, the NPPF and Development Plan

4.73 In light of the relevant statutory duty of the Planning Act 1990 (section 66(1)), considerable weight and importance is required to be given to the requirement to pay special regard to the desirability of preserving the special interest of the listed building on Site. The additional acoustic attenuation measures proposed as part of this revised scheme would result in a degree of harm to the special interest of this listed building. The meaning of preservation under the relevant parts of the Planning Act 1990 should be taken to mean the avoidance of harm, however, such a presumption is not overriding or irrebuttable, as there will be cases where such harm would be outweighed by material considerations powerful enough to do so.

4.74 There is also a duty in relation to the protection of conservation areas. This scheme would again preserve and enhance the contribution of this building and its use to the character and appearance of surrounding Hatcham Conservation Area. This is in accordance with the relevant statutory duty of the Planning Act 1990.

4.75 With regard to national policy in the NPPF, we have taken account of the key principles set out in paragraph 192, which encourages proposals to consider the desirability of sustaining and also enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; supporting the positive contribution that the conservation of heritage assets can make to sustainable communities, including their economic vitality; and, also the desirability of new development making its own positive

contribution to local character and distinctiveness.

4.76 The proposed scheme (now including additional attenuation measures) accords with this paragraph in the way that it supports the viable use of the listed building as a public house alongside reinstated residential accommodation in the interests of its long term conservation. This scheme would overall be able to deliver a significant number of heritage benefits, which would enhance or better reveal the significance of the listed building, and its contribution to the surrounding conservation area. These heritage benefits were set out in the previous Heritage Statement from 2018, and are also repeated here below for ease of reference as:

- *Re-establishment of the building's upper floor levels to residential use.*
- *Externally, installation of a new entrance door to match the surviving historic doors in the ground floor frontage, to reinstate an historic feature of the building, and revert it closer to its original design and appearance.*
- *Installation of a new entrance doorway to the residential accommodation, thereby improving the building's important ground floor appearance in key views from New Cross Road and Queens Road in the surrounding Hatcham Conservation Area.*
- *Removal of the existing large, unsightly ventilation flues from the rear elevation, and installation of a single, smaller flue in a more discreet arrangement / location, so that the expanse of historic brickwork is not interrupted by modern, utilitarian interventions.*
- *Alterations to the windows in the rear elevation, to return it closer to its original appearance, and so that their proportions and frames are sympathetic to the character of the building.*
- *Internally, the return of a small amount of floor space to public use as part of the most important pub premises at ground floor. Including re-arrangement of the layout at ground floor, to make more efficient use of the floor space, and create a higher quality residential entrance.*
- *Reinstatement of a traditional fire surround to the bare chimney breast within the residential entrance, to a design that is appropriate to the age and style of the building.*
- *Reinstatement of a chimney breast in the rear room of the pub premises, in a location as close as possible to an historic chimney breast (seen in 1898 floor plan).*
- *At first floor, plan form alterations to improve the legibility of the historic layout of two rooms at the northern end of the building, including the retention and repair of surviving embossed ceilings and ceiling rose.*
- *Construction of a new partition to reinstate legibility of the building's original rear envelope wall.*

- *Removal of numerous modern, unsympathetic partitions to reinstate the front of the first floor much closer to its original layout as a single, large room for public use.*
- *At second floor, the return of the existing Bedroom 10 to its likely original use as living space as part of the publican's accommodation.*
- *Removal of a small section of modern wall (to the existing shower room), to reveal the original length of the historic room.*

4.77 It must also be recognised that the now approved scheme of works of alteration on Site omits the previously proposed removal of the attic staircase (now to be reused and adapted), which has been considered by both the LPA and HE to have reduced (or even removed) any competing adverse impacts arising from those proposals on heritage significance.

4.78 It should be repeated that in recommending the past Listed Building Consent application for approval the Council also recognised at that time the public benefit that could be delivered by that scheme of works of alteration. Stating in the Officer Report that:

“Therefore, it is considered that the proposals to alter the listed structure and facilitate the historic use as residential, as well as the improvements provided in terms of the historic understanding of the plan form, would enhance the significance of the building. The proposal is therefore compliant with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 16 of the NPPF and DM Policy 36. This is a planning merit to which significant weight is attached.” (section 7.3.4 paragraph 118).

4.79 Paragraph 193 of the NPPF sets out that great weight should be given to the conservation of designated heritage assets. It then sets out at paragraph 194 that any harm to, or loss, of the significance of such assets requires clear and convincing justification. Accordingly, we have identified that the additionally proposed acoustic attenuation measures on Site, would in isolation result in a degree of harm to the significance of the listed building, and which would be of the magnitude of less than substantial harm for the purposes of the NPPF (paragraph 196).

4.80 Paragraph 196 of the Framework sets out that for cases of less than substantial harm, this should be weighed against the public benefits of the proposals as a whole, including where appropriate securing the optimum viable use of the designated heritage asset. Accordingly, the accompanying Planning Cover Letter prepared by Boyer provides a full assessment of all relevant planning considerations for this Site and the proposed works, including the overall planning balance in relation to the competing harms and benefits of the revised scheme.

4.81 It is the conclusion of this planning assessment by Boyer that the planning balance would favour such change, and harm to the significance of the listed building would be outweighed by the wider public benefits delivered by these proposals as a whole. This is assessed against the provisions of the NPPF when read as a whole, and also in light of the overarching statutory duties of the Planning Act 1990 as relevant. This provides clear and convincing justification for any such harm to heritage significance arising from these further acoustic attenuation measures.

- 4.82 Now turning to the relevant local planning policy for change affecting heritage assets. Local policy is required to be in conformity with the requirements of the Framework, and also the statutory duties of the Planning Act 1990. The proposed scheme would cause a degree of harm to the significance of the listed building, and of the magnitude of less than substantial as defined by the NPPF. In isolation, this could be seen to be in conflict with local policy requirements in relation to the protection of listed buildings. However, it is for the decision maker to determine whether any adverse impacts of granting Listed Building Consent for the works proposed would in overall terms outweigh the benefits delivered by these proposals.
- 4.83 We have also taken account of the policy requirements of the London Plan 2016 in relation to development affecting heritage assets. With regard to planning decisions, criterion C of Policy 7.8 (Heritage assets and archaeology) has been considered, which encourages development to identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- 4.84 The Draft New London Plan is also a material consideration in planning decisions. Accordingly, due consideration, but lesser weight, has been given to the provisions of draft Policy HC1, which has the key objective of reconciling heritage conservation and the sustainable growth of London.
- 4.85 We have also taken account of the policy requirements of the Lewisham Council's Core Strategy 2011 and Development Management Local Plan 2014 in relation to development affecting heritage assets. Including considering the relevant criteria of Objective 10 of the Core Strategy that seeks to ensure that new development and alterations to existing buildings are sensitive, appropriate to their context (ii), and preserve or enhance the condition and historic significance of heritage assets (iii).
- 4.86 Also considering the relevant criteria of Policy 36 of the Local Plan, which acknowledges that clear and convincing justification would be required for cases where the significance of an asset may be harmed by physical alteration or development (2). With specific regard to the conservation of listed buildings, criterion (7a) indicates that the Council would only grant consent for alterations that would sustain and enhance the significance of listed buildings, and also with regard to applications for a change of use would consider the contribution of the existing use and the impact of any new use on the significance and long term viability of the building (8). Accordingly, the Council accords with the Framework in seeking to ensure that such a building is put to its optimum viable use.

5. Summary and Conclusions

- 5.1 This Heritage Statement has been prepared by Turley Heritage on behalf of our Client, to provide a proportionate understanding of the heritage significance of The White Hart Public House at No.184 New Cross Road (grade II listed), together with the surrounding Hatcham Conservation Area, within the London Borough of Lewisham. The affected designated heritage assets have been identified and their significance described; in **Sections 2-3**.
- 5.2 Using this understanding of heritage significance, **Section 4** of this report sets out relevant information to the local planning authority with regard to the heritage impacts of the revised scheme proposals; for the proposed change of use from a hotel to 4no. residential apartments, and associated internal and external alterations to the listed building. This is further assessed in light of the relevant statutory duties, national and local planning policy and guidance for heritage assets.
- 5.3 Overall this scheme (and also for the previously approved scheme) would support the viable use of the building as a public house alongside reinstated residential accommodation in the interests of the long term conservation of this designated heritage asset. The scheme would also be able to deliver a significant number of heritage benefits, which would enhance or better reveal the significance of the listed building.
- 5.4 For this now revised scheme we identify that the additionally proposed acoustic attenuation measures on Site would in isolation result in harm to the significance of the listed building within the scale of less than substantial harm for the purposes of the NPPF (paragraph 196).
- 5.5 Paragraph 196 sets out that for cases of less than substantial harm, this should be weighed against the public benefits of the proposals as a whole, including where appropriate securing the optimum viable use of the asset. Accordingly, the accompanying submission by Boyer provides a full assessment of all relevant planning considerations for this Site and the scheme, including the overall planning balance in relation to the competing harms and benefits of the proposed scheme, including further acoustic attenuation measures.
- 5.6 This planning assessment by Boyer concludes that the planning balance would favour change, and such harm to the significance of the listed building would be outweighed by the wider public benefits delivered by these proposals as a whole. This has been assessed against the provisions of the NPPF when read as a whole, and also in light of the overarching statutory duties of the Planning Act 1990 as relevant. This provides clear and convincing justification for any such harm to heritage significance arising from the further acoustic attenuation measures for the revised scheme.

Appendix 1: List Entry

The White Hart PH, No.184 New Cross Road

THE WHITE HART

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: THE WHITE HART

List entry Number: 1346214

Location

THE WHITE HART, 184, NEW CROSS ROAD

The building may lie within the boundary of more than one authority.

County: Greater London Authority

District: Lewisham

District Type: London Borough

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 17-Feb-1999

Date of most recent amendment: Not applicable to this List entry.

Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 472996

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details

TQ 3576 NEW CROSS ROAD

No 184 The White Hart 779-/6/10091 II

Public house. Circa 1870, shown on the 1873 Ordnance Survey Map. Polychrome brickwork with stuccoed dressings, slate roof concealed by parapet and brick chimneystacks. Corner building of three storeys; five windows to New Cross Road elevation and two to Queens Road, including a tripartite window. Elaborate parapet with curved panel to Queens Road, pedimented panel with brackets to New Cross Road and modillion cornice. Corner full-height pilasters and bands between floors. All windows are sashes with vertical glazing bars and horns. Second floor windows are cambered with keystones and two windows have cast iron flower guards. First floor windows have round-headed arches filled with stuccoed decoration with keystones above, roundels between the windows and cast iron flower guards. Bar front has fascia, end pilasters with double brackets and windows with ventilation grilles above divided by pilasters. Interior retains a bar partition and both bars have original panelled wooden counter.

Listing NGR: TQ3575276868

Selected Sources

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: TQ 35752 76868

Map



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The above map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF - [1346214 .pdf](#)

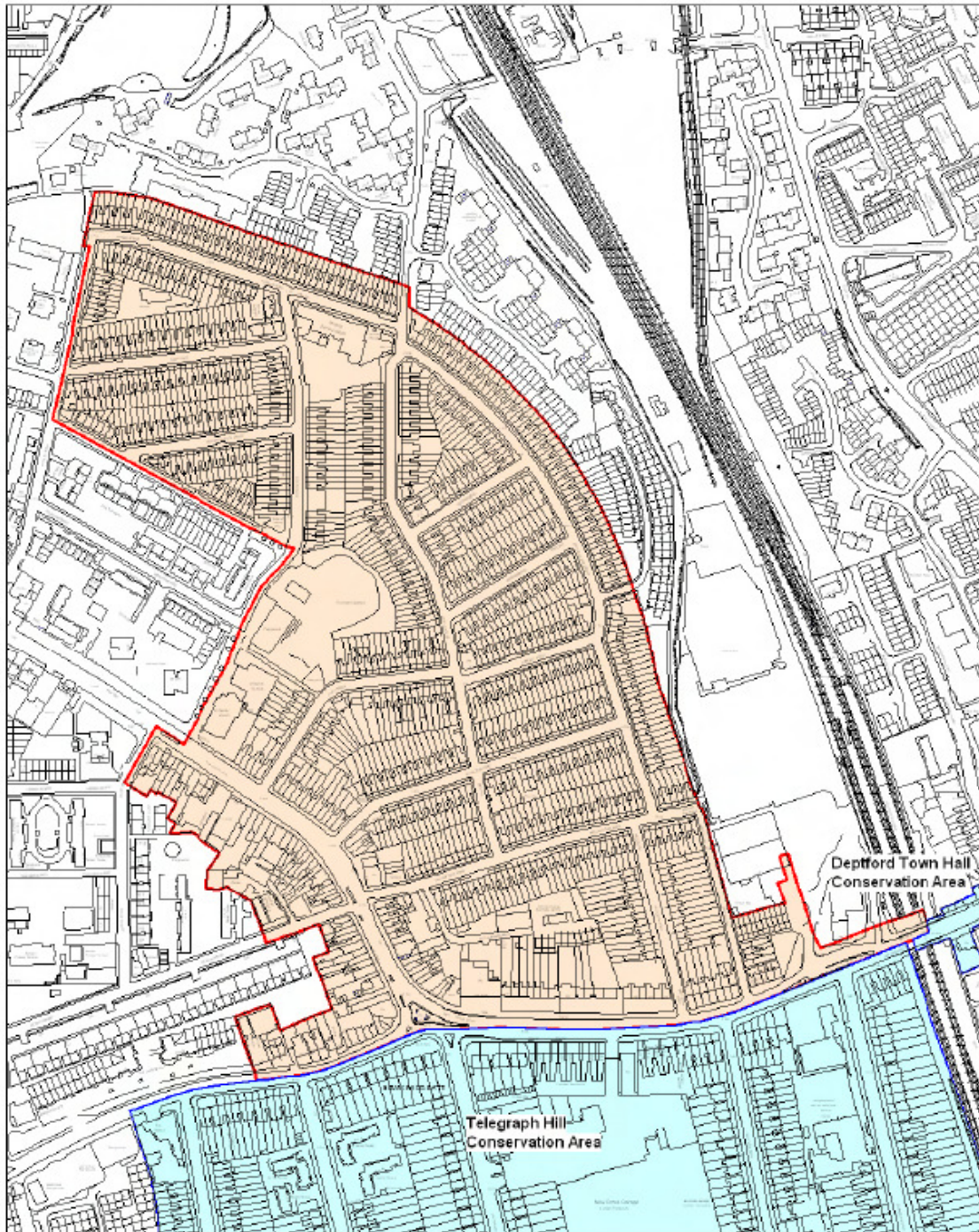
The PDF will be generated from our live systems and may take a few minutes to download depending on how busy our servers are. We apologise for this delay.



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Appendix 2: Conservation Area Boundary Map

Hatcham Conservation Area

Hatcham Conservation Area



-  Conservation Area
-  Adjoining Conservation Area

Designation: 1990
Appraisal: 2006
Article 4 (2): Yes, 2006, entire CA
Area: 24.64ha



Appendix 3: Heritage Legislation, Policy and Guidance

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

1. The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for:

“(s.7) ... any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest ...”

2. In determining such applications the following duty is placed upon the decision maker:

“s.16(2) In considering whether to grant listed building consent for any works the local planning authority, or as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

3. With regard to applications for planning permission within conservation areas, it is set out that:

“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

National Policy

National Planning Policy Framework (NPPF or the Framework) 2019

4. The Framework was first introduced in March 2012 and has subsequently been republished as revised in July 2018, and then again in February and July 2019. The most recent revision of the Framework post-dates the validation of the application for Planning Permission for development on Site on 5 April 2018 and subsequent refusal issued by the LPA on 8 August 2018. The new Framework provides a full statement of the Government’s planning policies. Chapter 16 - conserving and enhancing the historic environment, in particular sets out the Government’s policies regarding planning and the historic environment.
5. Paragraph 189 requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission, ideally as part of a Heritage Statement report. The level of detail should be proportionate to the importance of the assets and sufficient to understand the potential impact of the proposals on their significance. Paragraph 190 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.
6. Paragraph 192 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into viable uses consistent with their conservation; the positive contribution that

conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

7. Paragraph 193 further outlines that local planning authorities should give great weight to the asset's conservation when considering the impact on a proposed development on the significance of a designated heritage asset. The more important the heritage asset, the greater the weight should be. This reflects the requirements of the relevant statutory duties of the Planning Act 1990 and the paragraph further reflects the affirmation provided by recent case law that great weight must be given, irrespective of the degree of harm to significance. Annex 2 of the Framework defined "conservation" as:

"The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance."

8. Paragraph 194 specifies that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. Paragraph 195 outlines that local planning authorities should refuse consent where a proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied. Paragraph 196 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.
9. Paragraph 200 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal, the significance of a heritage asset should be treated favourably. It outlines that local planning authorities should also look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance.

National Guidance

National Planning Policy Guidance (NPPG)

10. National Planning Practice Guidance (NPPG) was first issued in 2014 by the Government as a web based resource and living document, and has most recently been updated in July 2019 (which again post-dates the application and determination of the appeal scheme for this Site). This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the Framework.

Development Plan

11. For the purposes of my Evidence, the Development Plan for the application scheme comprises the policies of the Mayor's adopted London Plan 2016, the Draft New London Plan first issued in December 2017 (which has now been subject to an Examination in Public, followed by the Mayor's response to the Inspector's recommendations on 9 December 2019, and so is a further material consideration at this advanced stage in its

preparation), and Lewisham Council's Core Strategy 2011 and Development Management Local Plan 2014.

Minor Alterations to the London Plan 2016

12. The London Plan was adopted by the Greater London Authority in July 2011 and sets out the Spatial Development Strategy for all Boroughs within Greater London. It replaces the London Plan (consolidated with alterations since 2004), which was published in February 2008. The Plan has been subsequently revised to ensure consistency with the Framework and other changes since 2011, and the Minor Alterations to the London Plan were published on 14th March 2016.

13. Policy 7.8 (Heritage assets and archaeology) which states that:

'Strategic

A London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset ...'

Lewisham Council, Core Strategy 2011

14. Core Strategy Objective 10 aims to protect and enhance Lewisham's character. The objective sets out that:

"Lewisham's distinctive local character will be protected through sensitive and appropriate design, in particular those areas requiring managed change and protection such as the borough's heritage assets and their settings, local rivers and landscape, and yet at the same time creating and improving the environment within the key regeneration and growth areas of Lewisham, Catford, Deptford and New Cross. This will mean:

- i. ensuring that new development achieves high standards of urban design and residential quality, and contributes to a sense of place and local distinctiveness informed by an understanding of the historic context;*
- ii. ensuring that new development and alterations to existing buildings are sensitive, appropriate to their context, and make a positive contribution to the urban environment;*
- iii. preserving or enhancing the condition and historic significance of the borough's heritage assets and their settings and the other identified elements of the historic environment."*

Lewisham Council, Development Management Local Plan 2014

15. DM Policy 30 (Urban Design and Local Character) establishes the general principles for new development proposals within Lewisham, and also provides guidance on the information requirements with regard to detailed design issues at individual development sites:

"General principles

- 1. The Council will require all development proposals to attain a high standard of design. This applies to new buildings and for alterations and extensions to existing buildings. The requirements of Core Strategy Policy 15 which sets out the aims for each Core Strategy spatial area will need to be met.*
- 2. Where relevant, development proposals will need to be compatible with and/or complement the urban typologies and address the design and environmental issues identified in Table 2.1 Urban typologies in Lewisham.*
- 3. The retention and refurbishment of existing buildings that make a positive contribution to the environment will be encouraged and should influence the character of new development and the development of a sense of place. Their value and significance as a heritage asset will be assessed as part of any development proposal.*
- 4. Other elements such as open spaces, rivers and topographical features that make a positive contribution to the environment should influence the future character of an area and be treated as key elements in the development of a sense of place.*

Detailed design issues

- 5. An adequate response to the following detailed matters will be required in planning applications to demonstrate the required site specific design response:*
 - a. the creation of a positive relationship to the existing townscape, natural landscape, open spaces and topography to preserve and / or create an urban form which contributes to local distinctiveness such as plot widths, building features and uses, roofscape, open space and views, panoramas and vistas including those identified in the London Plan, taking all available opportunities for enhancement*
 - b. height, scale and mass which should relate to the urban typology of the area as identified in Table 2.1 Urban typologies in Lewisham*

c. layout and access arrangements. Large areas of parking and servicing must be avoided

d. how the scheme relates to the scale and alignment of the existing street including its building frontages

e. the clear delineation of public routes by new building frontages, with convenient, safe and welcoming pedestrian routes to local facilities and the public transport network, including meeting the needs of less mobile people and people with young children

f. the quality and durability of building materials and their sensitive use in relation to the context of the development. Materials used should be high quality and either match or complement existing development, and the reasons for the choice of materials should be clearly justified in relation to the existing built context

g. details of the degree of ornamentation, use of materials, brick walls and fences, or other boundary treatment which should reflect the context by using high quality matching or complementary materials

h. how the development at ground floor level will provide activity and visual interest for the public including the pedestrian environment, and provide passive surveillance with the incorporation of doors and windows to provide physical and visual links between buildings and the public domain

i. new development must be sustainably designed and constructed in compliance with Core Strategy Policies 7 and 8

j. where there is an impact on a heritage asset a statement will be required that describes the significance of the asset, including its setting, and an assessment of the impact of the proposals upon that significance.”

16. DM Policy 36 refers to new development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens:

“A. General principles

1. For development proposals affecting heritage assets the Council will require a statement that describes the significance of the asset and its setting, and an assessment of the impact on that significance.

2. Where the significance of an asset may be harmed or lost through physical alteration or destruction, or development within its setting, the Council will require clear and convincing justification. The Council will consider the wider public benefits which may flow from the development where these are fully justified in the impact assessment.

3. The Council encourages the adaptation of historic buildings to improve energy efficiency in line with the detailed guidance provided by English Heritage. Careful consideration should be given to the most appropriate options for insulation, power use and power generation. Intrusive interventions, such as externally mounted micro-generation equipment or external wall insulation, should be avoided where these would

unacceptably alter the character and appearance of the heritage asset. The Council encourages the retention and thermal upgrading of historic windows.

B. Conservation areas

4. The Council, having paid special attention to the special interest of its Conservation Areas, and the desirability of preserving or enhancing their character or appearance, will not grant planning permission where:

a. new development or alterations and extensions to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials

b. development, which in isolation would lead to less than substantial harm to the building or area, but cumulatively would adversely affect the character and appearance of the conservation area

c. development adjacent to a Conservation Area would have a negative impact on the significance of that area.

5. The Council will encourage the reinstatement or require the retention of architectural and landscaping features, such as front gardens and boundary walls, important to an area's character or appearance, if necessary by the use of Article 4 Directions.

6. The Council will require bin stores and bike sheds to be located at the side or rear of properties where a front access to the side and rear exists.

C. Listed buildings

7. In order to ensure the conservation of Listed Buildings the Council will:

a. only grant consent for alterations and extensions to Listed Buildings which relate sensitively to the building's significance and sustain and enhance its significance and integrity

b. have special regard to the desirability of preserving the setting of Listed Buildings in considering any application in their vicinity, and consider opportunities for new development within the setting to enhance or better reveal the significance of the asset

c. use its powers under Sections 47, 48 and 54 of the Planning (Listed Buildings and Conservation Areas) Act 1990, to ensure that Listed Buildings are maintained to a reasonable standard.

8. When considering applications for change of use of Listed Buildings, the Council will consider the contribution of the existing use and the impact of any proposed new use to the significance and long-term viability of the historic building. The Council will seek to ensure that the building is put into an optimum viable use i.e. the one that causes least harm to the significance of the building, not just through initial changes but also as a result of subsequent wear and tear or any likely future changes. The implications of complying with Building Regulations, such as fire escapes, will be taken into account prior to determining applications for change of use.

D. Scheduled Monuments and Registered Parks and Gardens

9. Scheduled Monuments will be protected and preserved in accordance with Government regulation. Where the site or setting is adversely affected planning permission will be refused.

10. When considering the impact of a development proposal on Registered Parks and Gardens, or on their settings, the Council will consider that any loss or substantial harm to these assets will be in wholly exceptional circumstances. The Council will apply the provision in point 2 of the above policy to the assets.”

17. DM Policy 38 has regard to demolition or substantial harm to designated and non-designated heritage assets, and sets out that:

“1. Heritage assets are an irreplaceable resource and the greater the importance of the heritage asset, the greater the weight will be given to its conservation. Proposals for the demolition of, or substantial harm to a heritage asset will require clear and convincing evidence and will only be considered under exceptional circumstances for Grade II listed buildings, parks or gardens. Substantial harm or loss to designated heritage assets of the highest significance, including scheduled monuments and Grade I and II listed buildings, will only be considered under wholly exceptional circumstances.*

2. Proposals for demolition or substantial harm to designated heritage assets will be refused unless it can be demonstrated that these are necessary to achieve substantial public benefits that outweigh the harm or loss, and that there is no practical way of realising the benefits without demolishing the building or causing substantial harm.

3. Where applicants cannot demonstrate substantial public benefits all of the following will be taken into account in order to justify the loss or harm:

a. the significance of the asset, architecturally, historically, contextually, and any communal value. The greater the significance of the heritage asset, the greater the weight will be given to its conservation.

b. the nature and condition of the asset and the economic viability of its repair and re-use
c. the adequacy of marketing efforts made that would enable its conservation in the medium term

d. the adequacy of efforts to find alternative sources of funding or some form of charitable or public ownership

e. the benefits of bringing the site back into use.

4. Development proposals involving substantial structural alterations to a heritage asset need to demonstrate, by way of a structural survey and methodology statement, that the alterations proposed can be carried out without unacceptable risk to the integrity and significance of the asset.

5. Where demolition is proposed on the grounds that a building’s condition is beyond repair, a structural survey will always be required. This should be prepared by a suitably

qualified conservation professional and must describe, explain and illustrate the structural problems, and discuss repair options.

6. Where demolition or substantial harm is proposed on the ground that repair is not economically viable, the Council will require full supporting evidence, for example:

a. a valuation of the existing building and site

b. a full survey identifying the repairs required

c. development costs, including a costed schedule of repairs

d. an estimate of the value of the repaired property, including potential yields

e. evidence that the property has been marketed for a reasonable period at a price reflecting its condition.

7. Where demolition is sought on grounds of redundancy, applicants will be required to demonstrate by way of a marketing exercise that no viable use for the site can be found. The timing, period and means of marketing may be set by the Council and will depend on the type of building and marketing conditions. The Council will consider in its assessment the asking price, the property's condition, the extent of land that was offered with the building, and the terms of lease.

8. Demolition of a heritage asset will only be considered in conjunction with a full planning application for a replacement development."

Other Guidance and Material Considerations

National Advice

Department of Culture, Media and Sport Circular: Principles of Selection for Listing Buildings 2018

18. The Principles of Selection for listing buildings sets out the general criteria for assessing the special interest of a building in paragraph 16, as below:

"Architectural Interest. To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;

Historic Interest. To be of special historic interest a building must illustrate important aspects of the nation's social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing."

19. When making a listing decision, paragraph 17 sets out that the Secretary of State may also take into account:

“Group value: The extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings. Sometimes group value will be achieved through a co-location of diverse buildings of different types and dates.

Fixtures and features of a building and curtilage buildings: The desirability of preserving, on the grounds of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.

The character or appearance of conservation areas: In accordance with the terms of section 72 of the 1990 Act, when making listing decisions in respect of a building in a conservation area, the Secretary of State will pay special attention to the desirability of preserving or enhancing the character or appearance of that area.”

20. General principles for selection are also set out in this advice, in paragraphs 18-23. These include: Age and rarity; Buildings less than 30 years old; Aesthetic merits; Selectivity; and National interest, although State of repair will not usually be a relevant consideration.
21. In addition to the criteria and general principles set out in the guidance, a number of Selection Guides for different building types have been published by Historic England, first in 2011 and then later updated. These Selection Guides provide further information regarding each building type, and demonstrate what features are considered significant and likely to make a building of special architectural or historic interest when assessing each building type.

***Historic England, Historic Environment Good Practice Advice in Planning Note 2:
Managing Significance in Decision Taking in the Historic Environment 2015***

22. GPA Note 2 provides information to assist in implementing historic environment policy in the Framework and the related guidance given in the NPPG. These include; assessing the significance of heritage assets, using appropriate expertise, historic environment

records, recording and furthering understanding, neglect and unauthorised works, and marketing.

23. It provides a suggested staged approach to decision-making where there may be a potential impact on the historic environment:

- 1. Understand the significance of the affected assets;*
- 2. Understand the impact of the proposal on that significance;*
- 3. Avoid, minimise and mitigate impact in a way that meets the objectives of the Framework;*
- 4. Look for opportunities to better reveal or enhance significance;*
- 5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;*
- 6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.*

24. With regard to design and local distinctiveness, advice sets out that both the Framework (section 7) and NPPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- *The history of the place*
- *The relationship of the proposal to its specific site*
- *The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept*
- *The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size*
- *The size and density of the proposal related to that of the existing and neighbouring uses*
- *Landmarks and other built or landscape features which are key to a sense of place*
- *The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces*
- *The topography*
- *Views into, through and from the site and its surroundings*
- *Landscape design*
- *The current and historic uses in the area and the urban grain*

- *The quality of the materials*

Historic England: Advice Note 1: Conservation Area Designation, Appraisal and Management 2019 (2nd Edition)

25. This revised Historic England Advice Note supports the Framework and NPPG, and is intended to set out ways to manage change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management. It seeks to offer advice to all those involved in managing conservation areas so that the potential of historic areas worthy of protection is fully realised, the need for community and owner consultation examined, and the benefits of management plans to manage change, and achieve regeneration and enhancement, fully exploited. Advice on appraisal of conservation areas is also given, as assistance in demonstrating special interest and articulating character, guiding investment, and in developing a management plan.

Historic England: Advice Note 2: Making Changes to Heritage Assets 2016

26. This Historic England Advice Note provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone. This covers different types of heritage assets, including buildings and other structures; standing remains including earthworks; buried remains and marine sites; as well as larger heritage assets including conservation areas, registered landscapes, and World Heritage Sites. It is set out in the introduction that:

“This advice promotes positive, well-informed and collaborative conservation, the aim of which is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure that people can continue to use and enjoy them. Change to heritage assets and their settings is, of course, acceptable where it is sustainable in terms of the NPPF; change is only unacceptable where it harms significance without an appropriate balance of public benefit.”

Historic England: Advice Note 12: Statements of Heritage Significance 2019

27. This Historic England Advice Note provides general advice with regard to preparing statements of heritage significance and also the analysing of significance for the full range of heritage assets. This is designed primarily for applicants proposing changes to heritage assets, and accords with the Framework as revised.

English Heritage (now Historic England): Conservation Principles: Policies and Guidance 2008

28. This guidance document sets out Historic England’s approach to making decisions and offering guidance about all aspects of England’s historic environment. The contribution of elements of a heritage asset or within its setting to its significance may be assessed in terms of its “heritage values”:

“Evidential Value: the potential of a place to yield evidence about past human activity.

Historical Value: the ways in which past people, events and aspects of life can be connected through a place to the present.

Aesthetic Value: the ways in which people draw sensory and intellectual stimulation from a place.

Communal Value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.” (Paras. 30-60).”

29. A draft has been released for public consultation and subsequent revision of this document in 2018; to which very little material weight should be given at this stage.

Emerging Development Plan

Draft New London Plan

30. A Draft New London Plan was published by the Mayor for consultation in December 2017. GLA officers, after registering all representations received, prepared a report which summarised the main issues. Minor Suggested Changes were published in August 2018, although these changes were not subject to public consultation. The draft plan has since undergone an Examination in Public, which closed in May 2019. The Mayor’s response to the Inspector’s recommendations was issued on 9 December 2019. The Draft New London Plan is accordingly a material consideration in planning decisions in light of its advanced stage of preparation.
31. With regard to development affecting the significance of heritage assets, draft Policy HC1 of the new London Plan relates to reconciling heritage conservation and growth.
32. The publication of the Draft New London Plan in post-dates the application and determination of the appeal scheme on this Site.

Supplementary Planning Documents / Guidance

Hatcham Conservation Area Character Appraisal 2006

33. The Hatcham Conservation Area Character Appraisal was adopted by the Council in February 2006. The Appraisal sets out why the area is protected, what its special features are and makes recommendations for its future preservation or enhancement. This document forms part of the evidence base that planning officers use when making decisions on proposed development within the conservation area.

Hatcham Conservation Area Supplementary Planning Document 2006

34. This document provides detailed advice regarding external alterations to buildings within the conservation area, and outlines the Council’s expectations with respect to planning applications.

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