

Conservation comments	
Reference number	19/112087
Address	Church of St Mildred, St Mildred's Road, Lee, SE12 0RA
Proposal	Demolition of existing hall and its re-construction with two storey build plus linking buildings
Conservation Officer	Natasha Peach
Date	08.07.2019

Significance
<p>Advice provided in 2014 from the Conservation team identified St Mildred's Church as an 'Un-designated heritage asset' and was added to the Council's list of buildings to be added to the Local list as a result. This list is due to go before the Council in September 2019 with a recommendation to go out to consultation on the addition of the building (with the other nominations) onto the Council's Local List. It is also worth noting that this list has not been revised since 2014 with the exception of one building which was added as an urgent priority.</p> <p>The comments below elaborate further the initial in-principle objection and concerns raised by the previous Conservation Officer.</p> <p>The building appears to have been identified to the Council's conservation team during a pre-application meeting in 2014, and at that point the building was considered to be of special historic and architectural interest. As a result, DM Policy 37.3 is relevant:</p> <p><i>'Non-designated heritage assets may be identified during the development management process'.</i></p> <p>It is understood that the church was dedicated in 1878 and probably built in 1877 to 1879. The architect is registered on the Diocese of Southwark's website as H. Elliot. Preliminary research has failed to discover more about this architect, which may suggest that he was local, that this was a large commission for him, or that this is an incorrect attribution. There is some local idea that he may have been an American Architect who was specially commissioned, but I cannot find any specific evidence of this. Although the architect appears obscure, he was clearly capable, and the building is very successful, within the norms of the period and building type.</p> <p>Further, the Buildings of England attributes the stained glass in the building to Wilhelmina Geddes, an significant stained glass window artist with work featured in a number of historic buildings (listed, and unlisted), although becoming increasingly rare in England.</p> <p>The building is not nationally or locally listed, nor is it in a Conservation Area. It is considered to be a non-designated heritage asset of high significance for the following reasons:</p> <p>Historic interest:</p> <ul style="list-style-type: none"> • A generally well preserved and good example of a suburban church from the late Victorian period • Relation and works to significant international stained glass artist Wilhemina Geddes <p>Architectural interest:</p> <ul style="list-style-type: none"> • Gothic Revival (or Decorated Gothic style) building in a Latin Cross form of assured architectural quality with unusual and striking form elements, particularly the small east bell turret and upper room above the organ vestry. Clerestory with decorative hexafoils and three pointed arrangement to the elevations. • High quality original materials and detailing, both externally and internally. The church is built from Kentish ragstone with yellow Bath stone quoins to vulnerable corners and sloping tops to the

buttresses. Window cills, frames and tracery, and decorative courses on the elevation are finely detailed. Roofslopes in deep red clay tiles (now aged to a dark red/brown). These materials are all of architectural interest.

- 'The use of stone for the church adds a sense of quality and architectural status to the building' (Applicants Heritage Statement) with similar combinations used at Grade II St Stephens Church in Lewisham, Grade II All Saints in Blackheath, and St John's on Lewisham Way. The use of this high quality stonework highlights its intentional distinction in an area which is otherwise dominated by the use of yellow stock brick (and now later more modern materials). This provides an interesting and deliberate visual contrast and clear functional and architectural distinction between the church and neighbouring residential properties. The use of a non-local material signifies greater expense and prestige. The choice of materials also indicate thought and consideration in terms of longevity and durability as a building intended to last.
- High streetscape value. The church sits well back from the major South Circular road, with its tall nave standing above later neighbouring development and set within a well planted green garden. This, and the tall tree canopy provides a high quality historic contribution to the local townscape as a landmark that is visible in long and short views. The building dominates the plot through the substantial nave massing.
- As a historic C19 building within an area developed largely in the C20, and one for which the area has evolved around. The street which it is situated is also named after the church.

Impact

The demolition of the existing church hall is acceptable as it is not considered to be of any special interest in its own right or in relation to the church building. In terms of the principle of providing further space for community use and service, I raise no objection and would support the continued use of the building with additional space for a variety of functions.

However, there is a significant conservation concern regarding the proposed development to the east end of the church, and how it obscures one of the most important and prominent architectural features of the church; the apse, and also how it relates to the east end of the church generally. In the historic Gothic Revival conception of the building the east end was the most liturgically significant part of the church since it housed the altar; the focus for worship. This was reflected in the architectural elaboration of this part, through stained glass, a change of level, the altar, the internal direction of the nave, and internal decoration which all focus towards this end of the church. Externally, this focus is announced through a distinct volume with a curved form delineated through attached buttresses, and chapel and vestry either side. The view of these elements is integral to appreciating the function of the building and its hierarchy of spaces.

The proposals seek to attach a new extension (designed to provide breakout space and ancillary functions) which will wrap around the east end of the church. It is considered that this results in harm for the following principle reasons (as well as those discussed above):

- The principle of rearranging, obscuring, and ultimately absorbing this very significant part of the building will cause harm to the significance, understanding, and architectural quality and character of the building, and would completely affect its architectural impression to the local townscape. Although churches have been extended to the north, west and south for various purposes, extensions to the east are not part of the historical norm, except where they are for sanctified uses (for example additional chapels).
- It disrupts the historical plan form of the building. The proposed plan form of this element is currently architecturally uneasy in itself. It also runs counter to the significance of the building since it attaches an almost secular use to the east end, contradicting the confluence of function and form which drove the original design.
- The proposed elements would clutter and obscure some of the principle architectural features of the building, and would conceal the lower parts of the buttresses from external views – where the building meets the ground. This makes them appear meaningless as structural elements, since it would no longer be apparent that they reach to the ground and have both a visual and real supporting role to the apse wall. The buttress tops would appear to float above the roof of the

proposed building.

- The new development is not architecturally distinguished, nor does it relate to the historic building in any architecturally understandable way. I consider that the proposed materials, form and solid nature are insensitive, and do not relate to the building's character or materials. The proposal's form, uPVC windows, synthetic slate and brick all contrast to the historic character of the building which are highly acknowledged throughout the heritage statement as being of special interest. For these reasons I consider that as a result the proposed development is not of a high quality design, and instead of helping to enhance or better reveal the character of the building, creates a poor and incompatible relationship with the historic building, and hence does not comply with the requirements of DM 30 and 37.
- The submitted heritage statement refers to the existing church hall that is proposed to be demolished to make way for this development as 'visually incongruous' with the church because of its form, material and placement. I consider that the proposed development, when using the same assessment, would also be considered as visually incongruous by way of its placement, material and form.
- Further it is considered that there are other ways in which this re-development could be delivered in a much more elegant and less harmful way. This could be developed by using the land that the hall currently stands on and that to the south of it. It does not appear that the applicant has considered the comments raised by the conservation team previously, and they have provided any evidence that any other options have been explored. Further looking at the proposed floorplans, the proposed development which is considered cause harm (that which is proposed to be attached to the building's principle architectural feature) is largely used as a foyer space and is not necessary for the development of the community hall for which I raise no objection. For these reasons I consider that the harm is unwarranted and could be delivered in a way that does not cause harm.
- The heritage statement and submitted documents do not appear to consider the impact of the development on St Mildred's Road, and primarily focus on the impact to Helder Grove. Although this elevation is of high significance as it contains the main entrance to the church, the elevations onto St Mildred's Road are also of high significance and should have been assessed. As discussed above, St Mildred's is an important and significant part of the local townscape as a historic landmark. Its prominence and contribution to the local streetscape (as acknowledged in the heritage statement) help to define and identify the local area
- The detailing of the junction between the new structure and the historic curved wall with buttresses appears to be overly complex, and conceals and disguises the original architectural feature. I also consider the juncture of the new roof with the south transept window crude.
- The loss of the green buffer space to the north of the building for the few proposed parking spaces is considered to also be detrimental to the setting of the building and the streetscape here which is otherwise leafy and suburban in character. The loss of green space would have an urbanising character to a churchyard setting which has already been affected by the creation of a car park to the west of the building. Overall, I consider that these works would result in harm caused to the significance and architectural character of this prominent building in the local townscape.

I agree that the surrounding character, including the adjacent C20 residential block has eroded the setting and outlook of the church, however I do not consider that this justifies further loss and harm to a non-designated heritage asset, its setting, and to the local streetscene. Instead I consider that because this building appears to be the earliest building in this local townscape (one which its street name is named after), that it is of a higher significance here, and is essential in helping to retain the identity and sense of place here. I consider that the historic building and its landmark qualities, as well as its setting make a very positive contribution to the identity, character and environment here, and that any development proposed should be influenced by this.

The applicant has submitted further examples of extensions to churches elsewhere in London. The submitted examples, are each located in less prominent locations than the proposal and do not clutter or obscure principle architectural features.; they are highly glazed examples which still allow the historic

fabric to remain clearly discernible; they are glazed where they connect the church, and solid elsewhere which moves the solidity of the new massing away from the historic fabric. Further, they are also located in more discrete locations, and do not clutter or form part of the principle architectural features of the churches they form part of.

I note that no CGI's have been submitted which would have been useful when assessing the application. However some have been drafted on page 6 of the submitted Environmental and MEP Strategy which helps demonstrate the harm that I have identified.

Conclusion:

As I have said elsewhere in my comments, I do not object to the principle of extending the church to allow for more internal space. I object to the proposed development submitted to the council because of how it affects one of the most principle architecturally prominent features. I consider the proposed architecture in direct contrast to the historic building, and is not helping to reveal or enhance its historic or architectural character but further cluttering it with a poor quality development. I consider that the harm caused is unmerited since the public benefit (the re-provision of the church hall) is easily achievable without causing such harm to this locally significant building.

I therefore do not agree that this development would meet the requirements set out in NPPF policy, or our own policy.

Judgement in terms of the NPPF

Significance: As the building is not a designated heritage asset, its significance is not as high as those which are, and is therefore of moderate significance overall, but of high significance in its own right as a non-designated heritage asset.

Harm: As per the revised NPPG, LPA's must identify where on the scale of harm they consider development where harm is identified. I consider this development to be of 'less than substantial harm' as it does not result in the demolition of the building, but consider the harm to **high** on the scale of 'less than substantial harm'.

Balanced judgement: Overall I consider that as a building of high significance in its own right, and that the scale of harm is considered to be on the high end of 'less than substantial', that the proposed development should be refused as per NPPF 197, and the policies identified below. I consider that the development could still be carried out without causing harm to the understanding and significance of this non-designated heritage asset.

Policy

I consider the development to be contrary to the following policies:

Section 12 of the NPPF;

The core principles in the NPPF within paragraph 17 include that planning should seek to secure high quality design; take account of the different roles and character of an area; and conserve heritage assets for future generations;

NPPF 127 decisions should ensure that developments; a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change; d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit

NPPF 128, NPPF Para 130 - Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.

NPPF 197 – Effect of proposal on non-designated heritage asset should be taken into account; a balanced judgement should have regard to scale of harm or loss and the significance of the heritage asset.

London Plan Policy 7.8 Heritage assets and Archaeology

CS15 - Design

CS 16 - Heritage

DM30 1, 2, 3, 5a, 5c, 5d, 5f, 5g,

DM31 1, 2, 3

DM37 1, 3 and 4

Recommendation

Refuse

Potential revisions/amendments

The church should be supported in its efforts to re-provide a socially beneficial facility. In the search for a solution which is acceptable in conservation terms the following suggestions are offered as design considerations:

- A high quality, contextual and sympathetic building should be physically separate and visually distinct from the east end of the church, and not disrupt this significant part of the building.
- The footprint of the proposed hall could be expanded northwards to the line of the south wall of the chapel.
- With careful consideration an entrance could potentially be created to the west of the church, with a path running alongside the south wall of the nave. This might have the potential to create distinct entrances for nursery and public uses.
- A development which allowed the most significant parts of the historic building to remain visible and unobscured would be more likely to be supported. This is likely to be on the footprint of the existing building and to the south of the church.