

<b>DECISION MAKER</b> Cabinet Member for Regeneration	<b>DATE</b> 8 August 2022
<b>TITLE</b> Recommendation to add the following sites to the Royal Greenwich <i>Local Heritage List</i> : 1. Eltham Arcade, Eltham High Street, Eltham SE9 2. Wellington House, Messeter Place, Eltham SE9	<b>WARD (S)</b> Eltham Town & Avery Hill
<b>CHIEF OFFICER</b> Director of Regeneration, Enterprise & Skills	<b>CABINET MEMBER</b> Regeneration
<b>DECISION CLASSIFICATION</b> Non Key decision Non-exempt from call in Non-exempt report and appendices	<b>IS THE FINAL DECISION ON THE RECOMMENDATION IN THIS REPORT TO BE MADE AT THIS MEETING?</b> Yes

I. **Decision Required:**

This report makes the following recommendations to the Cabinet Member for Regeneration:

- I.1 Note the comments received in response to the owner/occupier consultation and the Royal Borough's response, set out in Appendix 1.
- I.2 Note the heritage assessments set out in Appendix 2 and the location plan and photographs in Appendix 3.
- I.3 Agree to add Eltham Arcade and Wellington House to the Royal Borough's Local Heritage List.

**Agreed/Not Agreed:**

**Date:** 08/08/2022

Signed .....

**Councillor Aidan Smith Cabinet Member for Regeneration**

## 2. **Links to the Royal Greenwich high level objectives**

2.1 This report recommends local heritage listing of two sites in Eltham due to their local heritage significance. The local distinctiveness of a place can provide a catalyst for regeneration to inspire well-designed new development which brings economic and social benefits. Retention and reuse of existing buildings also contributes to the Borough's aspirations for a greener Greenwich. This report therefore relates to the following Council's agreed high-level objectives:

- A Great Place to Grow Up
- A Great Place to Be
- A Cleaner, Greener Greenwich

## 3. **Purpose of Report and Executive Summary**

3.1 This report recommends the addition of two sites in Eltham  
(i) Eltham Arcade and  
(ii) Wellington House  
to the Royal Greenwich Local Heritage List ("the List"). Decisions to add buildings to the List are delegated to the Cabinet Member for Regeneration.

3.2 Both sites have been identified as candidate assets for local heritage listing during the planning (pre-application enquiry) process.

3.2 The sites have been assessed in the light of responses arising from an owner/occupier consultation in line with the procedure specified in the Royal Borough's Procedure Note for Local Heritage Listing 2021 (the "Procedure Note"). Its heritage significance has subsequently been judged against the selection criteria set out in the Procedure Note and it has been found to qualify.

3.4 Adding these two sites to the List would ensure their heritage significance can be understood and considered during the decision-making process.

## 4. **Introduction and Background**

4.1 The Procedure Note states that local heritage assets can be identified in three ways: through public nomination, through conservation area appraisal or through the planning process. In terms of the latter, buildings or sites can be identified during the course of a planning application or during a pre-application planning enquiry.

- 4.2 Candidate assets identified through the planning process and which meet more than one of the **six selection criteria** in terms of heritage value are recommended to the Cabinet Member for inclusion on the list. The selection criteria are set out in the Procedure Note and are as follows: Architectural Significance, Historical Significance, Archaeological Significance, Artistic Significance, Townscape or Landscape Significance, Communal or Cultural Significance.
- 4.3 The consultation process for this method of identification comprises a **14-day notification period for landowners and occupiers** of the sites in question, in order to provide certainty to stakeholders in a timely manner.
- 4.4 Both sites are currently the subject of pre-application planning enquiries for either total demolition or substantial alteration. The buildings on the sites were identified by officers as non-designated heritage assets.
- 4.5 National planning policy directs local planning authorities to assess the significance of any heritage asset affected by a development proposal. Local authorities are also directed to consider the effect on the significance of non-designated heritage assets, regardless of whether they are locally listed
- 4.6 The landowners and occupiers of both sites have now been consulted and the sites have been assessed against the selection criteria set out in the Borough's Procedure Note, taking into account the consultation responses.

## 5. **Available Options**

- 5.1 Option 1 - to agree to add Eltham Arcade & Wellington House to the Local Heritage List.
- 5.2 Option 2 - to agree to add Eltham Arcade to the Local Heritage List.
- 5.3 Option 3 - to agree to add Wellington House to the Local Heritage List.
- 5.4 Option 4 - to do nothing.

## 6. **Preferred Option**

- 6.1 **Option 1** - to agree to add Eltham Arcade and Wellington House to the Royal Borough's Local Heritage List, since this will ensure both buildings' heritage significance and any effect on their significance will be understood and considered during the decision-making process, as directed by national planning policy.

- 6.2 **Option 2** is not recommended since this would not fulfil Royal Borough's duty as a local planning authority to ensure the significance of Eltham Arcade is fully considered during the decision-making process.
- 6.3 **Option 3** is not recommended since this would not fulfil Royal Borough's duty as a local planning authority to ensure the significance of Wellington House is fully considered during the decision-making process.
- 6.4 **Option 4** - The 'do nothing' option - is not recommended since this would not fulfil Royal Borough's duty as a local planning authority to ensure the significance of these sites is fully considered during the decision-making process.

## 7. **Reasons for Recommendations**

- 7.1 The candidate local heritage assets have both been assessed in accordance with the Royal Borough's adopted Procedure Note on Local Heritage Listing (2021) and against the six local selection criteria set out in the procedure note.
- 7.2 The nominated assets were each found to meet more than one of the six selection criteria in terms of heritage significance. Therefore, they are both recommended for inclusion on the Local Heritage List.
- 7.3 The heritage assessments are set out in Appendix 2; if it is agreed to add these buildings to the Local Heritage List, these assessments these will form the basis for the descriptions on the List.

## 8. **Consultation Results and Assessment**

- 8.1 Public consultation has been carried out in accordance with the Procedure Note. Owners and occupiers were notified and asked to respond by 17 June 2022. Although consultation is not a statutory requirement, officers consider that it is a key step in ensuring engagement and transparency with landowners and occupiers.
- 8.2 The consultation statement (Appendix 1) provides a summary of comments received together with the Council's response.
- 8.3 Support for the local listing of Eltham Arcade was received from four business occupiers who consider the Eltham Arcade should be added to the Local Heritage List since it is unique architecturally and because there are few arcades surviving. They also believe it is important due to its interesting history and because many local people have memories of the Eltham Arcade.

- 8.4 The agent for the landowner of Eltham Arcade objected on the grounds that the site comprises nondescript utilitarian buildings which are incomplete and have been subject to significant alteration. It is not an unusual or rare building type but is typical of suburban 1930s architecture without the architectural qualities of 19C shopping arcades across the UK.
- 8.5 The agents for the landowner of Wellington House objected on the grounds that the site is dilapidated and vacant, it is not an unusual or rare building type, it retains no architectural features of interest or significance, it is one of many such depot sites in London, and it is a low-key contributor forming an awkward and unvalued part of the townscape.
- 8.6 The support and objections received have been taken into account and have strengthened the case for local heritage listing these two sites.
- 8.7 Assessment against the selection criteria for local heritage listing has found they both meet the criterion for *architectural interest*, since they both represent rare and unusual building types in the borough. Both landowner representations produced no evidence that there are similar building types in the Borough and this has strengthened the Council's assessment.
- 8.8 Furthermore, contrary to both objections, evidence was found to exist of historic fabric and features at both sites that demonstrate distinctive local characteristics and signify the sites' original function, which strengthens the Council's case for *architectural significance*.
- 8.9 The sites were also found to meet the criterion for *townscape significance*, since they both make a positive contribution to local character. In respect of Eltham Arcade, comparison with 19C Grade II listed arcades in the UK is not relevant and does not weaken the case for local listing. In respect of Wellington House, the representation acknowledges it makes a low-key contribution to local character.
- 8.10 Both sites were found to meet the selection criteria for *historical significance*. Wellington House is associated with an industry of national and regional note; the objection acknowledged this but produced no evidence of similar depots surviving across London.
- 8.11 The objection regarding Eltham Arcade did not consider the 1930s to be important per se or in terms of Eltham's development; however the assessment found that the site reflects significant commercial expansion and an increase in social mobility in Eltham during the 1930s and so illustrates aspects of the area's social and economic history, in line with the criterion.

8.12 Eltham Arcade was also found to meet the criterion for *communal and cultural significance* since it played an important role in Eltham’s social and cultural history. The low occupancy rate highlighted in the objection is not relevant to this criterion. Representations from business occupiers in the Arcade also strengthened the case for its architectural, historical and communal significance.

9. **Next Steps: Communication and Implementation of the Decision**

9.1 If agreed, the nominated site or sites will be added to Royal Greenwich’s Local Heritage List. The updated List will replace the current list on the Royal Borough’s website.

9.2 Nominating bodies or individuals and owner/occupiers will be notified in writing of the decision and the updated List will be made available on the Royal Borough’s website. Entry on the List will be a Local Land Charge.

10. **Cross-Cutting Issues and Implications**

Issue	Implications	Sign-off
<p><b>Legal</b> including Human Rights Act</p>	<p>The Cabinet Member for Regeneration is requested to agree to add Eltham Arcade &amp; Wellington House for inclusion in the Local Heritage List.</p> <p>Local Heritage Lists are not statutory. The Local Heritage List is a list of buildings that are considered to be of special local interest to the Royal Borough of Greenwich. The buildings which are on the Local Heritage List do not meet the criteria for statutory listing, but are valued for their contribution to the historic understanding and identity.</p> <p>As a non-statutory planning tool, the Local Heritage List does not afford any legal protection against demolition or alteration unlike buildings and sites that are Statutorily Listed. However, the fact that a building or feature is on a Local Heritage</p>	<p>Hema Limbachia (Planning and Procurement team) 26/07/2022</p>

	<p>List means that its conservation as a heritage asset is a material consideration when determining planning applications. The decision maker must adopt a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.</p> <p>The assets have both been assessed in accordance with the Royal Borough of Greenwich's adopted Procedure Note on Local Heritage Listing (2021).</p> <p>The Cabinet Member for Regeneration is authorised to make the decision recommended by this report pursuant to paragraph 1.19 of the Royal Borough of Greenwich's adopted Procedure Note on Local Heritage Listing (2021).</p> <p>Under the Human Rights Act 1998, local authorities have a duty to promote and protect human rights. This report has outlined the consultation that has been undertaken and the opportunities for people to make representations to the Council.</p>	
<b>Finance and other resources</b>	<p>This report requests the Cabinet member for Regeneration to note the comments received in response to the owner/occupier consultation and the Royal Borough's response, and the heritage assessment as set out in Appendix 1 2 respectively and to agree to add Eltham Arcade and Wellington House to the Royal Borough's Local Heritage List.</p> <p>There are no direct financial implications arising from this report.</p>	<p>Sue Rock Accountancy Business Change Manager 11/07/2022</p>
<b>Equalities</b>	<p>The decisions recommended have a remote or low relevance to the substance of the</p>	<p>Rebecca Duncan,</p>

	Equality Act. There is no apparent equality impact on end users. This report contributes to the Council's Equality and Equity Charter and the Council's Equality Objectives 2020-2024 since it encourages owner/occupier participation as well as building good relations, creative aspirations and a growth mindset	Conservation Officer 13/07/2022
<b>Climate change</b>	This report recommends a document for adoption which contributes to the Greenwich Carbon Neutral Plan agreed by Cabinet on 18 November 2020 through advocating retention and reuse of existing buildings and brownfield sites	Rebecca Duncan Conservation Officer 13/07/2022

## 11. **Report Appendices**

11.1 The following documents are to be published with and form part of the report:

- Appendix 1: *Statement of Consultation*
- Appendix 2: *Draft local heritage listing description for Eltham Arcade*
- Appendix 3: *Location Plan and Photographs*

## 12. **Background Papers**

[Royal Greenwich Local Heritage Listing Procedure Note & Selection Criteria 2021](#)

[Royal Greenwich Local Plan: Core Strategy with Detailed Policies 2014](#)

[Royal Greenwich Statement of Community Involvement 2020](#)

[National Planning Policy Framework 2021](#)

[Historic England Advice Note 7: Local Heritage Listing 2021](#)

Report Author: Rebecca Duncan – Conservation Policy Officer  
Tel No. 020 8921 5355  
Email. [Rebecca.Duncan@royalgreenwich.gov.uk](mailto:Rebecca.Duncan@royalgreenwich.gov.uk)

Reporting to: Michael Clarkson – Planning Policy Manager  
Tel No. 020 8921 4296  
Email. [Michael.Clarkson@royalgreenwich.gov.uk](mailto:Michael.Clarkson@royalgreenwich.gov.uk)

Chief Officer: Pippa Hack - Director, Regeneration, Enterprise & Skills  
Tel No. 020 8921 5519  
Email. [Pippa.Hack@royalgreenwich.gov.uk](mailto:Pippa.Hack@royalgreenwich.gov.uk)