
Planning and Heritage Statement

County Hall Apartments – South Block



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County Hall Apartments



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1. Introduction

This Planning Statement has been prepared on behalf of our client Virtus Contracts Limited to submit a planning application in respect of proposals for the erection of a new external fire escape and concealment of existing pipework at County Hall Apartments, South Block – one of the blocks of flats located near the junction of Westminster Bridge Road at its junction with Belvedere Road.

1.1. Application Content

This application has been submitted online via the Planning Portal (Ref: PP-09417607) and comprises the following information:

- Completed application form and certificate B
- Completed CIL questions form
- Statutory application fee £234.00
- Design and Access Statement, prepared by Aros Architects;
- Planning and Heritage Statement, prepared by Savills
- Drawings prepared by Aros Architects, as follows:

Drawing number	Title	Scale
6252 (00) 001 Rev P1	Site Plan	1:500 @ A3
6252 (00) 000 Rev P2	Location Plan	1:1250 @ A3
6252 (00) 100 Rev P2	Existing Basement & Ground Floor Plans	1:100 @ A3
6252 (00) 200 Rev P2	Existing Elevations & Sections	1:100 @ A3
6252 (20) 100 Rev P2	Proposed Ground and Basement Floor Plan	1:100 @ A3
6252 (20) 200 Rev P2	Proposed Elevations & Sections	1:100 @ A3

1.2. Description of Development

Planning permission is sought from Lambeth Council for the *“Installation of a new external fire escape, like for like replacement of existing door on south elevation and concealment of existing pipework on the South Block”*. In summary the works comprise:

- Installation of a new external fire escape on the south elevation
- Like for like replacement of existing door on south elevation
- Concealment/screening of existing pipework on site

The full scope of works are shown on the submitted drawings and Design and Access Statement prepared by Aros Architects.

In the next section, we provide a description of the site and surrounding area before describing the pre-application consultation that has been undertaken.

2. Site Description and Context

The application site forms part of the County Hall Apartments development, located behind the main riverside-facing County Hall block. The residential flats building in question is South Block – bounded by York Road to the east, Westminster Bridge Road to the south, Belvedere Road to the west, and Forum Magnum Square to the north. The North Block is bound by Chicheley Street.

We understand that along with other buildings comprising the County Hall group of buildings, South Block was built for office use for then London County Council between 1936-1939. South Block was later converted to residential flats, along with South Block, in 1995/1996, with east and west wings then added to each block in 1999/2000.

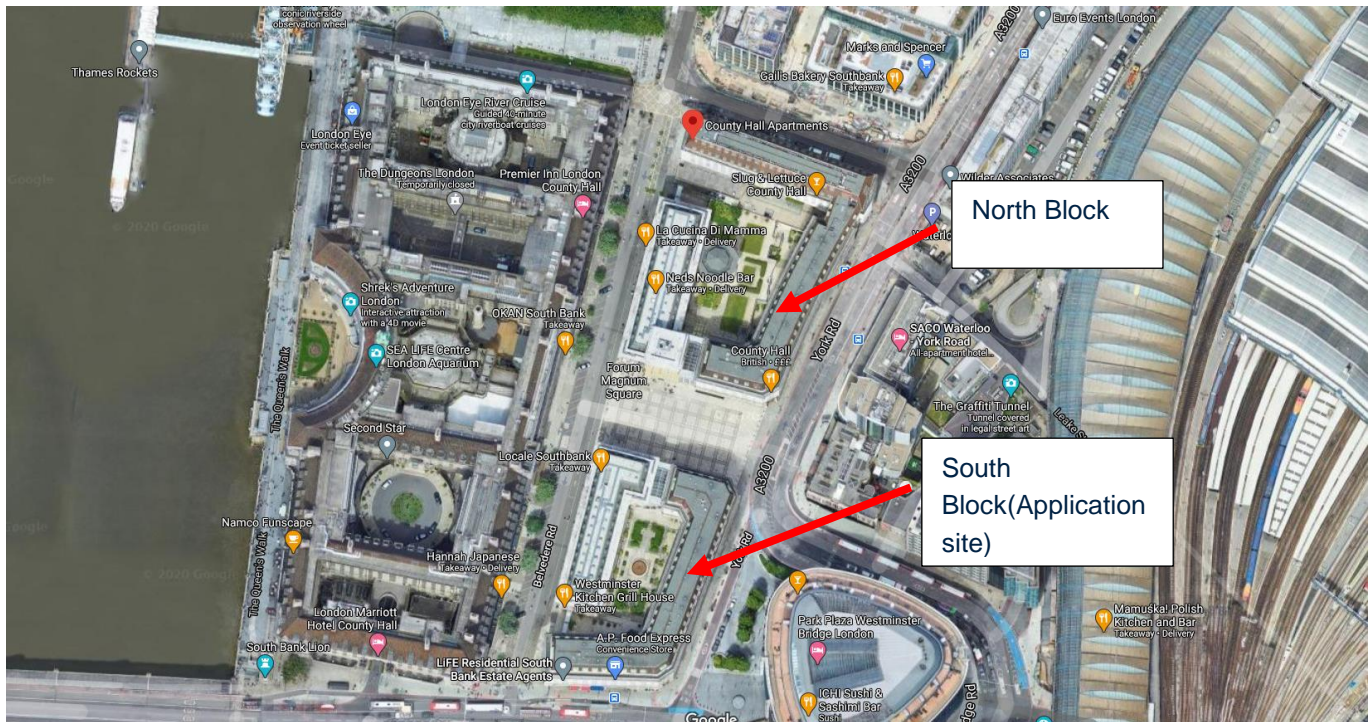


Figure 1: Aerial view of the apartment blocks (Google Maps, 2020)

The site is located within the South Bank Conservation Area, the London Plan Waterloo Opportunity Area and whilst not statutorily protected by a formal heritage listing, it is defined by your Council as a “locally listed” building. The Grade II* County Hall is located adjacent to the site, on the opposite side of Chicheley Street, fronting the River Thames. The

The Local Heritage List (updated 24 July 2020) on the Council’s webpage identifies County Hall north and south blocks as “Built 1937-1963, to design of FR Hiorns. Foundation stone laid in 1937 but not completed until after World War II. Modernist influence is evident in simpler design and reduced moulding and ornamentation in comparison to County Hall itself. Attractive lamp columns frame the main entrance. It has an important relationship with the main block of County Hall and has a good street frontage to York Road, Belvedere Road and provides excellent enclosure to Forum Magnum Square.”



Figure 2: Street view of South Block at County Hall Apartments (Google Maps, 2020)

3. Pre-application Advice

In this section of the report, we summarise the pre-application advice received in respect of the development proposals.

A formal request for pre-application advice was submitted to Lambeth Council on 18 November 2020. A virtual meeting took place with the planning officer via MS Teams on 8 January 2021 and the officer's formal advice was received by letter on 8 January 2021. Overall the pre-app advice from Officer's was positive and the Conservation Officer raised no objections to the proposal, with the letter concluding that the proposal is considered to be acceptable. The key points raised in the response are summarised, as follows:

- The works proposed are on a secondary elevation which is less sensitive than the front and side elevations
- The introduction of a black metal escape stair is in keeping with the existing black metal balcony and the concealment of pipework with planters are in keeping with those elsewhere within the courtyard, these are considered to be sympathetic to the age and style of the building and are at low level, maintaining views of the elevation and adding minimal visual clutter.
- The proposed works are not considered to cause harm to the significance of the locally listed building or to the character or appearance of the conservation area.
- The proposed pipework is not considered to result in an impact on neighbouring amenity.

In the next section, we review the planning context for the application site.

4. Planning Context

4.1. Planning History

We have reviewed your authority's online planning record. There is an extensive planning history for County Hall Apartment blocks over the years and the most relevant applications that relate to South Block is set out in the table below.

Reference	Description	Date
91/01380/PLANAP	Renewal of planning permission granted by the Secretary of State on 27th October 1987 for the use of the South Block as offices. (Regd plan nos 12459/91/1380. Applicant's plan nos 4/001, 002).	Granted - 12 May 1992
94/01565/PLANAP	Conversion and use as 411 residential units and part of the ground floor to Class A1, A2 and A3 units, together with surface and underground car parking to the North and South courtyards and basement and the installation of new windows.	Granted - 31 August 1995
95/01533/PLANAP	Erection of two seven storey residential blocks, attached to the existing north & south blocks, and facing Belvedere Road, comprising 170 residential units, with ground floor retail/office/restaurant	Granted - 15 April 1996
96/01232/PLANAP	Change of use of part lower ground floor north block to gymnasium, unit onto Belvedere Road to A3, and creation of six residential units on lower ground floor (south block), conservation area consent	Granted - 1 April 1997

4.2. Planning Policy

Planning law requires that where regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise¹. In assessing and determining development proposals, the National Planning Policy Framework (NPPF) 2019 states that local planning authorities should apply a presumption in favour of sustainable development and, where proposals comply with the development plan, should approve them without delay.

The development plan in Lambeth is the London Plan (2016), the Lambeth Local Plan (2015) and the South Bank and Waterloo Neighbourhood Plan. Together with Supplementary Planning Documents, the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), are all material considerations alongside the Council's development plan. The next section summarises the key local planning policies.

The Council are currently reviewing their Local Plan and consulted on a new Draft Revised Lambeth Local Plan which was published in October 2018. The Draft Revised Lambeth Local Plan Proposed Submission Version (DRLLP PSV, January 2020) was included in the publication for Cabinet on 13 January 2020. The formal pre-submission publication has also now taken place and the DRLLP was submitted to the Secretary of State for Examination on 22 May 2020. The Draft Revised Lambeth Local Plan is a material consideration in planning decisions but is currently afforded very limited weight.

¹ Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town and Country Planning Act (1990)

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In December 2019 the London Plan (Intend to Publish version) was published by the Mayor of London. This followed the Examination in Public on the Draft London Plan (published in December 2017), which was held between January and May 2019. On 21 October 2019 the Panel of Inspectors appointed by the Secretary of State issued their report and recommendations. Many of these recommendations (although not all) were incorporated into the Intend to Publish version. The draft London Plan is given a significant amount of weight in planning decisions. It will not be given full weight until the final version of the London Plan is published. On 13 March 2020 the Secretary of State formally directed the Mayor to make a number of detailed modifications to the wording of various policies. The Secretary of State's letter to the Mayor dated 24 December 2020 agreed most of the modifications but, there is still ongoing dialogue to agree the modifications.

Lambeth Development Plan Policies (2015)

The key development plan policies are, as follows:

- Policy Q1 relates to inclusive environments and states that design of developments should reflect good practice principles.
- Policy Q2 concerns amenity, development will be supported that takes consideration of visual amenity of adjoining sites, privacy, outlook, overlooking, daylight and sunlight, noise, outdoor amenity space and servicing equipment.
- Policy Q3 relates to community safety and states that proposals are expected to create positive and attractive environments.
- Policy Q5 relates to local distinctiveness, proposals will be supported where the design of the development is a response to positive aspects of the local context and historic character.
- Policy Q7 supports new development of a quality design and sets out a range of criteria that should be considered, including well proportioned, bulk, mass, local character, well considered windows and doors, creates attractive roofscapes/roof tops.
- Policy Q8 relates to design quality and construction detailing. This policy seeks to ensure that proposed building designs and submitted details are buildable and visually attractive.
- Policy Q11 relates to building alterations and extension, and states that the Council will seek to ensure, wherever possible, that new or replacement plant or equipment are not placed on publically-visible elevations and, where integration is not an option, are adequately and robustly screened.
- Policy Q22 states that development proposals affecting conservation areas will be permitted where they preserve or enhance the character or appearance of conservation areas.
- Policy Q23 states that the council will maintain a list of undesignated heritage assets which it considers to be of local (or greater) significance.

In the next section we set out the heritage statement.

5. Heritage Statement

This section of the report sets out the Heritage assessment in respect of the scheme proposals. As mentioned above in this statement County Hall Apartments is included in the Council's list of locally listed buildings.

5.1. South Bank Conservation Area

Listed Buildings, Conservation Areas, locally listed buildings and non-designated assets that can be shown to have moderate qualities in their fabric or historical association. The South Bank Conservation Area was first designated on 27 July 1982 and the Conservation boundary was last changed on 18 July 2016. The earliest significant building is County Hall, dating from the 1920s. The majority of buildings date from the post-war reconstruction. The Royal Festival Hall (Grade I) and the centrepiece of the Festival of Britain site acted as a catalyst for the development of the whole area.

The South Bank Conservation Area statement (2007) states that the N & E Block and S & W Blocks of County Hall, Belvedere Rd/ York Rd were built in 1937-1963, to design of FR Hiorns. Foundation stone laid in 1937 but not completed until after World War II. Modernist influence is evident in simpler design and reduced moulding and ornamentation in comparison to County Hall itself. It has an important relationship with the main block of County Hall and has a good street frontage to York Road, Belvedere Road and provides excellent enclosure to Forum Magnum Square. The blocks are considered to be Graceful inter-war blocks by F R Hiorns. Well considered detailing executed in stone and attractive lamp columns frame the main entrance.

The list of Local Architectural or Historic Interest sets out the 'undesigned heritage assets' and describes both the north and south blocks to have an important relationship with the main block of County Hall and has a good street frontage to York Road, Belvedere Road and provides excellent enclosure to Forum Magnum Square.



Figure 3: View of Entrance of North Block at County Hall Apartments (Source: The South Bank Conservation Area statement, 2007)

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As with many of the surrounding structures in the South Bank Conservation Area, the front elevations of the north and south blocks of County Hall Apartments is considered to make a good contribution to the to the Conservation Area.

5.2. Heritage Assessment of Scheme Proposals

The proposals seek to undertake a sympathetic minor works to the site, This section should be read in conjunction with the submitted drawing pack and the Design and Access Statement prepared by Aros Architects.

The principle of the external alterations have been accepted by the Council as set out in their pre-application response (see section 3 of this Statement. The proposals are located on the secondary elevation of the block which is a less sensitive part of the elevations. The proposed black metal fire escape staircase is considered to be in keeping with the design of the building and has been sensitively designed. The planters are also in keeping with the surrounding courtyard and are considered to be sympathetic to the age and style of the building and are at low level, maintaining views of the elevation and adding minimal visual clutter. In addition, the planters will screen the existing pipework and enhance this area of the southern elevation.

Therefore, the proposed works are not considered to cause harm to the character or appearance of the Conservation Area. The proposals are considered to be acceptable and seek to preserve and enhance the 'undesigned heritage asset'. The proposals are in accordance with Policy Q23 and the Conservation Area guidance and the Paragraph 197 of the NPPF. The Conservation Officer is in favour of the proposals as set out in the Council's pre-application response letter summarised in section 3 of this statement.

In the next section we assess the scheme against relevant planning policies.

6. Planning Assessment

Principle of Development

The lawful use of the building is in residential use. The proposal does not seek to change the use of any land or building and will retain existing use of the building. The emerging proposals are minor in nature and principally comprise the erection of a new external fire escape and concealing of existing pipework.

Design and Heritage Impacts

The building is locally listed and the scheme architect has sought to achieve a high quality design, both architecturally and in terms of urban design on site. The draft scheme is considered to be well designed and high quality and has been carefully considered by analysis of the existing building form and surrounding area. The external staircase will serve as a fire escape to the South residential block and will be visually attractive and robust. The fire escape will be integrated into the building envelope on the south elevation of the building, see page 11 of the Design and Access Statement.

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The existing pipework was erected as part of emergency works to the building and is not proposed on important elevations. The pipework has been integrated into the building and to ensure it is more visually inconspicuous an effective robust screened enclosure is proposed. This will create a more attractive environment for residents and the wider County Hall apartment blocks.

In the next section we set out our conclusions.

7. Conclusion

The proposals have been sensitively designed taking into consideration the character and appearance of the South Bank Conservation Area. In our opinion the proposals are not considered to have a negative impact on the visual amenity of existing occupiers or on the locally listed building itself. In our view, the proposal is considered to be compliant with Local Plan Policies Q8, Q7, Q11, and the NPPF.

We trust you have the necessary information to register, validate and determine this application. However, please do not hesitate to contact my colleague Raveen Matharu or myself if you have any queries. We look forward to receiving your acknowledgement of the application in due course.

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