

12 December 2023

Planning Division  
London Borough of Lambeth  
Phoenix House  
10 Wandsworth Road  
London  
SE8 2LL

FAO Stephanie Malik and Doug Black

Dear Officers

## **Application for Listed Building Consent | Temporary artwork vinyls at the Royal Festival Hall, Southbank Centre**

### **Introduction**

Enclosed is an application for listed building consent, made on behalf of the Southbank Centre, for the temporary application of artwork vinyls on level 2 and 5 as part of the Imagine Children's Festival during 5<sup>th</sup> -16<sup>th</sup> February at Royal Festival Hall, Belvedere Road, London SE1 8XX.

The Imagine Children's Festival will take place over 11 days over half term in February 2023. It will offer a diverse range of activities and workshops including theatre, comedy, music, literature, poetry and dance, designed for children aged 0-11. The aim is to inspire creativity, celebrating individuality of every child, championing diversity and sparking imaginations. Part of the festival will include the mish Mash Trail, created by the Heart n Soul Feel Good Designers. It will guide visitors to explore interactive art installations throughout the Royal Festival Hall. LBL officers confirmed that the art installations do not require listed building consent as these will not fall under the category of 'alteration, extension or demolition'. The proposed vinyl applied to the windows and floor of the Royal Festival Hall is considered to temporarily alter the appearance of the listed building and therefore listed building consent is sought for the artwork vinyls only.

The proposed description of development for the listed building consent application is:

*"Temporary application of artwork vinyls as part of the Imagine Children's Festival at the Royal Festival Hall"*

### **Application content**

This application has been submitted via the Planning Portal (ref: PP- 12661016). This planning and heritage letter and the following make up the application and supporting documents:

- Application form
- Design and Access Statement, prepared by Southbank Centre
- Location plan at scale 1:1250, prepared by Southbank Centre
- Existing and proposed plans and elevations prepared by Southbank Centre

There is no planning admin fee required for this listed building consent application.

### **Royal Festival Hall**

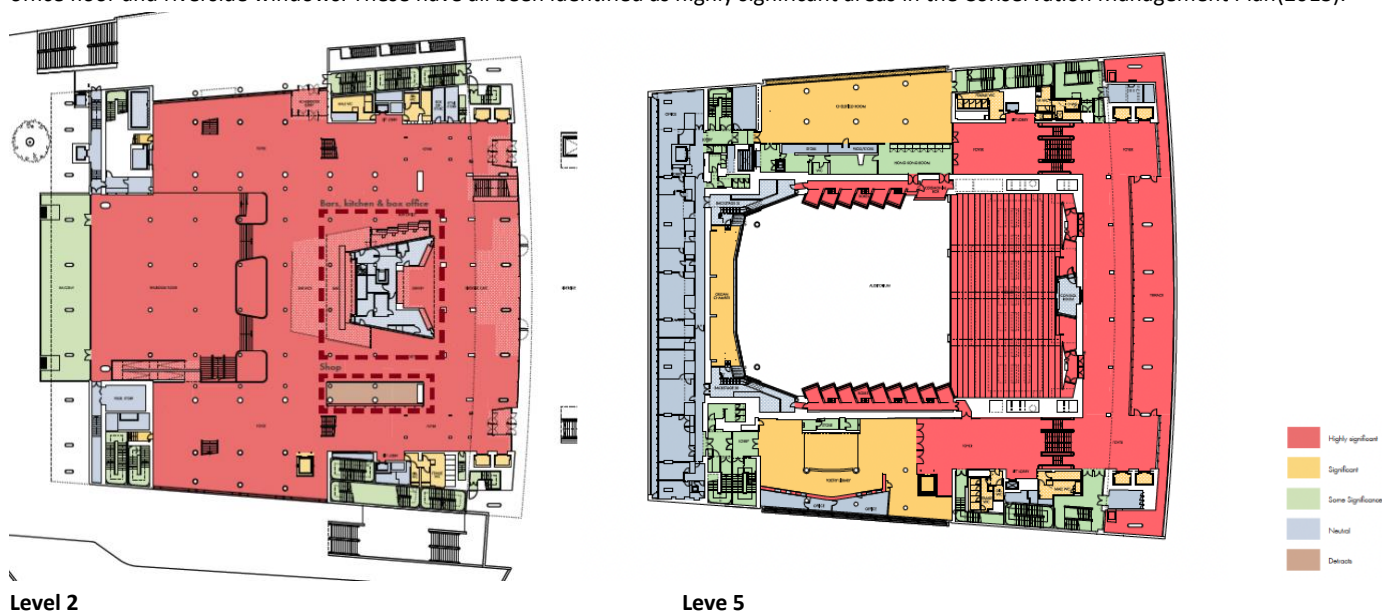
The site context (and its heritage significance) is described in the accompanying Heritage, Design and Access Statement, prepared by Allies & Morrison and so is not repeated in any detail here. The Royal Festival Hall is a Grade I listed building located on the Southbank of the River

Thames in Waterloo. It forms part of the Southbank Centre complex, which includes the Queen Elizabeth Hall, the Hayward Gallery, the Purcell Room and various publicly accessible open-air spaces.

The Royal Festival Hall was constructed in 1951 as part of the Festival of Britain, designed by Leslie Martin and Peter Moro under the leadership of Robert Matthew (LCC's Architect department). A significant extension to the building was added in 1964. Further interventions were undertaken by Allies & Morrison in the 2000s. The scope of these A&M works included the reinstatement of the cloakroom in its original/existing location.

The Royal Festival Hall is a leading performance venue, nestled within the wider Southbank Centre site, which is host to a wide range of creative uses, including creative workspace, educational, art and exhibition space and other food and drink, offices and public amenity facilities in a mix of E Class: Commercial and business, F1: Learning and non-residential institution; and sui generis uses.

**Space impacted by the works** | The proposed artwork vinyls will be applied on the floor and the windows on Level 2 and 5. Specifically on blue side exhibition space windows, riverside terrace café windows, riverside terrace external balustrade, riverside foyer floor, green side box office floor and riverside windows. These have all been identified as highly significant areas in the Conservation Management Plan(2013).



### Relevant planning history

There is a very detailed planning history relating to the Royal Festival Hall – and the Southbank Centre as a whole. Of relevance to this application, are the respective planning permissions granted for the annual Winter Event held across the different spaces/locations present at the Southbank Centre site since 2008.

### Winter Event

Year	Start Date	End Date	Duration	App refs
2016-17	28 October	31 January	14 weeks	16/04445/FUL and 16/04446/ADV
2017-18	27 October	19 January	12 weeks	17/03694/FUL and 17/03695/ADV
2018-19	23 October	14 January	12 weeks	18/03398/FUL and 18/03562/ADV
2019-20	22 October	13 January	12 weeks	19/02934/FUL and 19/02936/ADV
2020-21 (Withdrawn)	4 September	3 January	17 weeks	20/00917/FUL and 20/00918/ADV
2022 (excluding the London Literature Festival)	24 October	8 January	10 weeks	22/02633/FUL, 22/02632/ADV and 22/02631/LBC
2023 (including the London Literature Festival)	19 <sup>th</sup> October	9 January	13 weeks	23/02319/FUL, 23/02188/LBC, 23/02301/ADV

**Site designations:** The relevant planning designations identified within the Development Plan for the Royal Festival Hall site as a whole include:

- South Bank Conservation Area
- Opportunity Area - London Plan Waterloo Opportunity Area
- Area of International Significance
- Central Activities Zone
- LBL Strategic Cultural Area
- London Plan Thames Policy Area
- Neighbourhood Planning Areas - Southbank and Waterloo Neighbours Forum (SOWN)
- EA Flood risk zones 2 – 3

## Planning Framework

The policies within the National Planning Policy Framework 2023 (NPPF), including the Planning Practice Guidance 2021 (PPG) form a material consideration in determination of this application. The Development Plan is formed of the GLA's London Plan 2021, the Lambeth Local Plan 2020-2035 (September 2021) and the Lambeth Local Plan Policies Map (September 2021). Overall, these documents are to be awarded full weight in the decision-making process. Other relevant guidance includes Historic England's Conservation Principles, Policies and Guidance (April 2008).

**Relevant policy reference:** NPPF Section 16 Conserving and Enhancing the Historic Environment; London Plan Policy SD4 Central Activities Zone, HC1 Heritage Conservation and Growth, HC5 Supporting London's Culture and Creative Industries, LBL Policy ED13 Visitor Attractions, Leisure, Arts and Cultural Uses, Policy Q18 Historic Environment Strategy, Policy Q20 Statutory Listed Buildings.

## Summary of works, planning considerations and assessment

The proposals include applying 15 individual PVC-free vinyls with removal adhesive and laminated with PVC-free laminate to the building surfaces (floor and windows) at level 2 and level 5. The window vinyls will be between 0.2sqm and 0.5 sqm in size. The floor vinyls will be between 1.5sqm and 2sqm in size. The vinyls are made of recycled materials and will be recycled at the end of the festival. There is no material change of use proposed as part of the application. The overall use characteristics and general operations of the site will not change significantly, albeit the proposed event will be delivered to enhance its offer and in turn help generate much needed income to help to achieve Southbank Centre's overall charitable objectives. The key planning consideration associated with the works is the impact on the special architectural and historical significance of the Grade I listed Royal Festival Hall.

**Policy summary |** Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. It makes it clear at Paragraph 199 that when considering the impact of a proposed development on a heritage asset (including its setting), Local Planning Authorities should give great weight to preserving the assets significance. Any harm or loss should be exceptional. In the case of a Grade I listed building, substantial harm or loss should be wholly exceptional (Para 200). If the harm is deemed to be less than substantial, Paragraph 202 requires that harm to be weighed against the public benefits, including where appropriate securing the optimum viable use. The NPPF also sets out that account should be taken of the desirability of sustaining and enhancing the significance of heritage assets, putting them into viable uses consistent with their conservation.

The London Plan Policy HC1 confirms that works to a heritage asset should conserve their significance and avoid harm by integrating heritage considerations early. Continued beneficial use should be sought through sensitive adaptation avoiding harm, while allowing adaptations to address changing needs. Works to listed buildings should preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting or, where appropriate, restoring original or significant detail and historic fabric. LBL's policy Q5 requires the design of development to respond to the positive aspects of the local context and historic character. Policy Q20 Statutory listed buildings aim to conserve and not harm the significance or special interest of a listed building and its setting.

**Assessment |** The principle of applying temporary artwork vinyls to the Royal Festival Hall has been approved over the years as part of the Summer and Winter Events. The proposed vinyls have been designed for the site and this event, taking into consideration the unique circumstances, including its sensitive heritage setting. Although these vinyls will be applied to areas of high significance, they will only be in place for a short period of time and therefore the appearance of the listed building will only be altered on a temporary basis. The adhesive

has been tested and will not leave a sticky residue once removed and therefore the vinyls will not harm the historic fabric of the listed building, which complies with Q20 of the Lambeth Local Plan.

The vinyls are contained within the Royal Festival Hall and does not spill out onto other areas of the South Bank. It will not obscure any existing viewpoints of the WWHS and maintains a good quality of public realm on the Queen's Walk, in accordance with LLP Policy Q19 and LP Policy HC2. It would also not interfere with any strategic views (to include both the Royal Festival Hall and the Queen Elizabeth Hall to the North Bank of the River Thames, nor the Panoramas from both Brockwell Park and Norwood Park to the City), in accordance with Policy Q25 (Views). Therefore will not impact on the character and appearance of the listed building or the Southbank Conservation Area.

## **Summary**

The Imagine Children's Festival is part of the Southbank Centre's cultural programme during the half term in February 2024. This will help improve SC's current offer, attracting more visitors to the site to enjoy the event as well as the wider activities on site. The proposals will deliver public benefits by providing interactive and immersive entertainment for visitors, whilst allowing them to enjoy the wider setting of the listed building, conservation area, MOL and the World Heritage Site. The proposals will also help Southbank Centre achieve its overall charitable objectives.

The proposals are temporary and are sensitively integrated within existing public realm and the Grade I listed building. The proposals have been assessed against the development plan for the site and are considered to be in general conformity with the provisions outlined above. They are balanced against the heritage gains and public benefits that will be delivered. The proposed works will enhance visitors' overall experience which in turn will help the Southbank Centre maintain its international reputation, whilst benefitting the local community.

If you have any questions, please contact Melanie Gurney at [melanie@theplanninglab.com](mailto:melanie@theplanninglab.com), or on 020 72579363.

Yours faithfully,  
**The Planning Lab**