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Dear Mr McGregor

Pre-application Advice

SURREY COUNTY HALL , PENRHYN RD, KINGSTON UPON THAMES KT1 2DN

Thank you for involving Historic England in your early pre-application proposals relating to Surrey County Hall. It was very useful to see the building and discuss the proposals with you, Surrey Council Heritage Officers and the Royal Borough of Kingston Upon Thames on 6th December 2019.

Significance

The County Hall was originally built in 1893 in a free renaissance style by C.H.Howell, and has been subsequently extended over time as the Council function and staffing levels increased. Architect Vincent Harris was commissioned to extend the building in 1930 and again 1938. He opted for a restrained Portland Stone classical appearance that formed a quadrangle behind the main building. The part known as the Ashcombe Wing was destroyed in the Second World War and successfully rebuilt in 1953. A further range was added in 1963 that sought to architecturally respond to the scale and form of the earlier extensions, albeit with less refinement. The final range was added in 1983 giving the County Hall its figure of eight footprint. The layout of these ancillary ranges in this way provides a harmonious relationship with the main 1893 building, giving the County Hall a strong institutional character and clear hierarchy of spaces that emphasis the dominance of the parent building and the complex's importance civic and authoritative status.

Internally, much of the principal spaces are accommodated within the original 1893 building and 1930's extension (including the rebuilt Ashcombe Wing), which we understand contain a high degree of it original plan form, panelling, staircases, fixtures and fittings. In contrast the interiors of the extensions are understood to be relatively simple, lacking architectural features of note, and have been subject to alteration and subdivision.

Impact of the Proposed Development

The proposals consist of three distinct elements; the conversion of the retained listed



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buildings to either residential or student/university use; the demolition and redevelopment of the 1892 Computer Wing and 1963 extension; and erection of new buildings to the south of the County Hall building.

Conversion of the retained listed buildings

Whilst no proposals have been worked up in detail, the main 1893 building, 1930 Entrance Block and Ashcombe Wing are proposed to have a separate more publically accessible function, with uses as a boutique cinema/cafe, university teaching or leisure/office accommodation muted.

With regards to the 1930 and 1938 ranges, in all the development options provided, these ancillary parts of the listed buildings are earmarked for the greatest degree of change and would involve various alterations to provide either residential or student accommodation. A double-storey mansard roof extension is proposed to the western range to match the neighbouring ranges. The options for residential (For Sale/Rental) conversion would involve extensive internal remodelling of the plan form and insertion of a more intensive cellular form and multiple vertical cores throughout. Student/University conversion would involve intensive subdivision but possibly retain more of the existing plan form and circulation cores.

Demolition of the 1983 Computer Wing and 1963 extension

All development options currently being explored involve the demolition of these two ranges and replacement with a new independent building of between 4 and 6 storeys.

New buildings to the south of County Hall

The Staff Club building that sits adjacent to the County Hall building along Penrhyn Rd is proposed to be demolished and replaced with a new building of between 6-9 storeys and additional 4 storey building would be built to the car park behind the building.

Relevant Legislation and Policy

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty for Local Planning Authorities as decision makers to consider the impact of development proposals on listed buildings. They are required to have special regard [my emphasis] to the desirability of preserving the special architectural and historic interest of listed buildings and their settings.

Section 72 of the Act requires that special attention [my emphasis] shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Guidance on the exercise of that duty is given in the National Planning Policy Framework (NPPF) which establishes the conservation of the historic environment as part of the overarching environmental objective necessary for the delivery of sustainable development.



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The Framework goes on to require that any intervention or development likely to affect the significance of a designated heritage asset, should provide an assessment of that impact (Para 189). Local Authorities are instructed to use these assessments to avoid or minimise any conflict between the heritage asset's conservation and any aspect of a proposal (Para 190). In determining these applications local authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation and seeking new development to make a positive contribution to local character and distinctiveness (Para 192). Where harm to significance is likely to result it must be clearly and convincingly justified and outweighed by the delivery of public benefits (Paras 194-196). In determining the balance of harm and benefit, great weight must be given to the conservation of the heritage asset, and the more important the asset the greater that weight should be (Para 193).

Position

Historic England welcomes these early discussions on managing change of the County Hall site in the interest of securing its long-term future. At present no detailed designs have been produced, so these comments will be limited to the general principle of the proposals and conceptual schematics provided.

When considering change to a complex site such as this, we always recommend that a conservation management plan is undertaken which sets out the significance of the assets affected and identifies how that significance would be sustained through any future use. We are delighted to see that considerable thought has been given to the significance of the building and how your proposals impact on that significance through the production of the Heritage Appraisal.

We are supportive of finding new use for the building, which we understand will be surplus to Surrey County Council's requirements. The development options presented focus of residential or student led conversions. We understand alternative uses have been explored and it would be helpful if this options appraisal could be shared with us so we can better understand the reasons for those being discounted. Our guidance note 'Disposal of Heritage Assets' (<https://historicengland.org.uk/images-books/publications/disposal-heritage-assets/guidance-disposals-final-jun-10/>), provides clear advice on finding alternative uses for heritage assets, and particularly the need that the preferred use should not be determined by yielding the maximum financial return but rather is the most appropriate use for the heritage asset, which is in accord with paragraph 192 of the NPPF.

Works to 1893 building, 1930 Entrance Block and Ashcombe Wing

We would agree with the submitted Heritage Appraisal that these areas are of highest significance. We recognise these areas offer challenges as well as huge potential to be adapted to economically viable new uses which would secure their long-term future. Therefore we are certainly open to the principle of seeking a new use here that



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could provide the opportunity to improve public access within these principal spaces. Our concerns will be in the detail of the proposals and impact on these highly significant spaces identified in the heritage appraisal. Careful consideration will need to be given to aspects such as accessibility, signage and servicing. We would be happy to provide advice on these as this develops.

Conversion of the 1930 and 1938 ranges

We are content in principle, with the proposed conversion of these ranges, which in our view could be adaptable for the uses proposed. However, as these areas are where some of the greatest intervention could be made, it will be important to undertake a more in depth analysis of the significance of these spaces, such as the plan form, partitioning and surviving features which should to help to inform the scope of change that can be accommodated here. Excessive intervention to these spaces could risk undermining the coherence and integrity of these part of the heritage asset. Consideration will also need to be given to the relevant local planning policies and building regulations, so a fuller understanding of the impacts of this approach can be understood and is fully achievable.

Mansard roof extension to the western range

As per our advice above, the existing roof form to this range is of significance and we understand retains the original north light lanterns that originally lit the drawing rooms beneath. The function of this room is also evident from street level through the sparse fenestration at second floor level. Before we can provide specific comments on this element of the scheme it would be helpful if further information could be provided so we can understand the significance of the surviving fabric and the quality of the spaces beneath.

Demolition and replacement of the 1963 and 1983 Ranges

This element would present one of the most visible changes to the County Hall's appearance, which does raise some concerns. These constitute the more modern parts of the Town Hall complex, and appear to be of lower significance. They therefore present the greatest scope for change. In our view, whilst we do not oppose the redevelopment of the 1980s Computer Wing, the loss of the 1963 extension would be regrettable, as although lacking the refinement of the earlier extensions, is a handsome building that is architecturally coherent with the rest of the County Hall site.

We would encourage the retention and adaption of the 1963 building and an alternative design approach be pursued for the northern most range, that is visible recessive and fits sensitively and contextually into the County Hall's overall composition, ideally retaining and enhancing upon the figure of eight footprint.

Redevelopment to buildings south of County Hall

The demolition and redevelopment of the 1960s Staff Club building and car park to its rear are not contentious in principle. Careful consideration will need to be given to the





design, scale, and massing of these blocks to avoid adversely impacting upon the setting of the Grade II County Hall and nearby conservation areas. This element of the scheme equally offers opportunities to enhance the setting of the County Hall along Penrhyn Road, by setting this new building further back from the road to open up views of the County Hall.

Next Steps

We encourage you to consider the above advice, which we hope can assist in limiting the potential conflict between the proposals and the significance of this important heritage asset. We would welcome the opportunity to work with you further through the pre-application process to develop these proposals further.

The building's listing description dates to 1983, and provides a brief and somewhat ambiguous description of the building's significance. In our experience similar project can attract application for listings late in the process, which can sometimes delay and frustrate projects. It's advisable to seek a listing enhancement at this early stage, which would provide greater clarity and certainty as to where the significance lies and the degree of change that would be appropriate. Further information on this and how to apply for a listing enhancement can be found on our website [<https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisory-services/listing-enhancement/>](https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisory-services/listing-enhancement/).

Yours sincerely

Andrew Scott

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Information Provided

191128_SCH_Initial_Stage_2_Report.pdf

2019.06.24 Surrey County Hall Heritage Appraisal v3a_A4_op_RFS.pdf

2019.07.02 Heritage Impact Assessment of Options.pdf



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