

Item No.
2

CITY OF WESTMINSTER			
PLANNING APPLICATIONS SUB COMMITTEE	Date 1 October 2024	Classification For General Release	
Report of Director of Town Planning & Building Control		Ward(s) involved Pimlico North	
Subject of Report	Parkinson House, Tachbrook Street, London, SW1V 2QB		
Proposal	Removal and replacement of three flat entrance doors at Flats 54, 67 & 89.		
Agent	None		
On behalf of	Westminster City Council		
Registered Number	24/04345/COLBC	Date amended/ completed	27 June 2024
Date Application Received	27 June 2024		
Historic Building Grade	IISTAR		
Conservation Area	Lillington and Longmoore Gardens		
Neighbourhood Plan	Pimlico Neighbourhood Plan		

1. RECOMMENDATION

<ol style="list-style-type: none"> 1. Grant conditional listed building consent 2. Agree the reasons for granting listed building consent as set out on informative 1 of the draft decision letter.

2. SUMMARY & KEY CONSIDERATIONS

<p>Listed building consent is sought for the removal and replacement of the entrance doors to three empty flats Nos. 54, 67 & 89 to burn test and evaluate the fire resistance of existing original doors to inform a future door renewal programme.</p> <p>The burn testing is proposed to be undertaken on two doors, one an unaltered original four glass panelled hardwood door and frame, and the other an upgraded original door and frame.</p> <p>Objections have been received from the C20th Society and residents of the Lillington Gardens Estate on the grounds that the loss of listed fabric would cause harm to the significance of the Grade IISTAR</p>

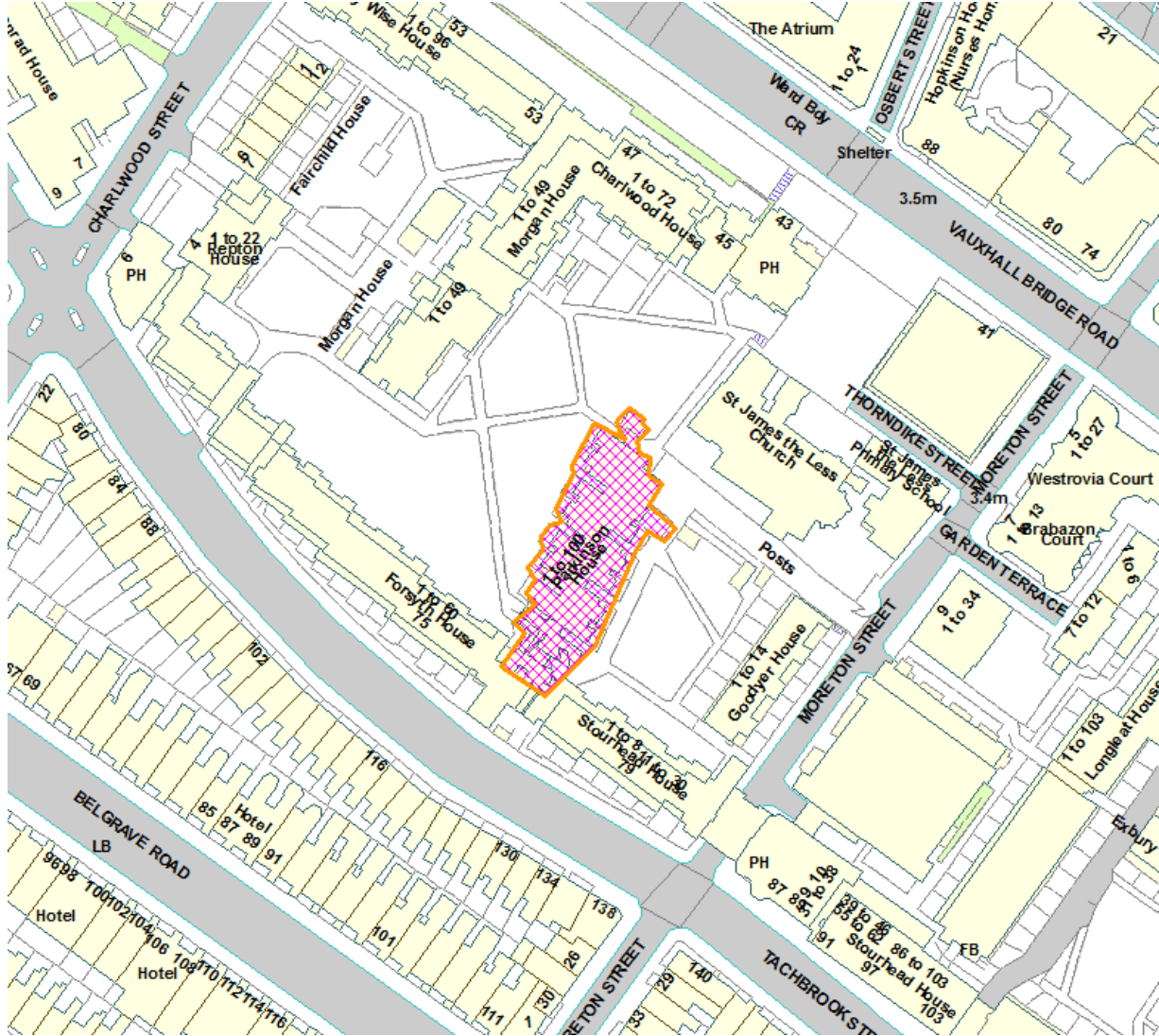
listed building; the number of doors being tested is excessive and two of the doors have already been removed without consent.

The key consideration in this case is:

- the impact on the special interest (significance) of the listed building.

Notwithstanding the concerns expressed by the C20th Society and residents, the proposals are considered to cause a low level of less than substantial harm, which is adequately balanced by the public benefits of facilitating improved fire safety for residents.

3. LOCATION PLAN



This production includes mapping data licensed from Ordnance Survey with the permission of the controller of Her Majesty's Stationary Office (C) Crown Copyright and /or database rights 2013.
 All rights reserved License Number LA 100019597

4. PHOTOGRAPHS

FRONT OF BUILDING



5. CONSULTATIONS

5.1 Application Consultations

20TH CENTURY SOCIETY

Object. Unnecessary to fire test two door sets to destruction. As it is widely acknowledged that the existing unaltered door will fail the fire test, request that only an upgraded door is fire tested, thereby avoiding the unnecessary loss of a heritage asset. Also request that across the estate, only one of each door type is tested rather than multiple identical doors from different buildings on the estate, to safeguard the estates heritage. Express concern that the doors to Flats 54 and 67 have already been removed without consent and the lack of detail in the application regarding the careful removal and storage of these heritage assets.

HISTORIC BUILDINGS AND PLACES

Any comments received to be reported verbally by officers.

COUNCIL FOR BRITISH ARCHAEOLOGY

Any comments received to be reported verbally by officers.

SOCIETY FOR THE PROTECTION OF ANCIENT BUILDINGS

Any comments received to be reported verbally by officers.

THE VICTORIAN SOCIETY

Any comments received to be reported verbally by officers.

HISTORIC ENGLAND

Authorisation to determine received

ADJOINING OWNERS/OCCUPIERS AND OTHER REPRESENTATIONS RECEIVED

No. Consulted: 100

Total No. of replies: 7

No. of objections: 7

No. in support: 0

Objections have been received on the following grounds:

Heritage harm:

- removal of listed fabric causing harm to the significance of the building
- the number of doors being tested is excessive and the works are unnecessary

Other

- unnecessary costs to leaseholders,
- unauthorised removal of the doors
- concerns over the impartiality of the testing company.

PRESS NOTICE/ SITE NOTICE:

Yes

5.2 Applicant's Pre-Application Community Engagement

Engagement has been carried out by the applicant with the local community and key stakeholders in the area prior to the submission of the application in accordance with the principles set out in the Early Community Engagement guidance.

A drop-in session at the Lillington and Longmoore Estate Community Centre was held which members of the residents group attended to ask questions regarding the project. A site meeting was also held with the residents working group (LALGRA), Historic England, London Fire Brigade, WCC Housing and United Living.

6. WESTMINSTER'S DEVELOPMENT PLAN

6.1 City Plan 2019-2040 & London Plan

The City Plan 2019-2040 was adopted at Full Council on 21 April 2021. The policies in the City Plan 2019-2040 are consistent with national policy as set out in the National Planning Policy Framework (NPPF) (December 2023) and should be afforded full weight in accordance with paragraph 225 of the NPPF. Therefore, in accordance with Section 38 of the Planning and Compulsory Purchase Act 2004, it comprises the development plan for Westminster in combination with the London Plan, which was adopted by the Mayor of London in March 2021 and, where relevant, neighbourhood plans covering specific parts of the city.

As set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 47 of the NPPF, the application must be determined in accordance with the development plan, unless material considerations indicate otherwise.

6.2 City Plan Partial Review

The council published its draft City Plan Partial Review for consultation under Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 on 14 March 2024. The consultation closed on 9 May 2024 and the council is currently considering the responses received. The Partial Review includes updated policies for affordable housing, retrofitting and site allocations.

An emerging local plan is not included within the definition of "development plan" within s.38 of the Planning and Compulsory Purchase Act 2004. However, paragraph 48 of the NPPF provides that a local authority may give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

Footnote 22 to paragraph 48 states that during the transitional period for emerging plans consistency should be tested against the version of the Framework, as applicable, as set out in Annex 1 (paragraph 230). This means that the consistency of the policies in the City Plan Partial Review must be tested for consistency for the purposes of paragraph 48(c) against the September 2023 version of the NPPF.

Accordingly, at the current time, as the Partial Review of the City Plan remains at a pre-submission stage, the policies within it will generally attract limited if any weight at all.

6.3 Neighbourhood Planning

The Pimlico Neighbourhood Plan includes policies on a range of matters including commercial and mixed-use development, design and heritage, housing and hotels, public realm and environment.

It has been through independent examination and was supported by local residents and businesses in a referendum held on 22 September 2022. It was adopted on 7 December 2022. It therefore forms part of the development plan for Westminster for development within the Pimlico neighbourhood area in accordance with Section 38 of the Planning and Compulsory Purchase Act 2004. Where any matters relevant to the application subject of this report are directly affected by the policies contained within the neighbourhood plan, these are discussed later in this report.

6.4 National Policy & Guidance

The City Plan 2019-2040 policies referred to in the consideration of this application have been examined and have been found to be sound in accordance with tests set out in Paragraph 35 of the NPPF. They are considered to remain consistent with the policies in the NPPF (December 2023) unless stated otherwise.

7. BACKGROUND INFORMATION

7.1 The Application Site

Parkinson House is a Grade I ISTAR listed building located within the Lillington Gardens Estate which is located within the Lillington and Longmoore Gardens Conservation Area. The building ranges between five to seven storeys and comprises a mix of residential flats and bed-sits.

Designed by Darbourne and Darke for the City of Westminster the Lillington Gardens Estate is exceptionally significant in the development of British social housing between the 1960s and 1970s and most buildings within it are listed at Grade II or I ISTAR.

7.2 Recent Relevant History

Planning and listed building consent applications (23/00132/COFUL and 23/00133/COLBC) were submitted in January 2023 for the replacement of all flat entrance, store and communal doors in Parkinson House. These applications have given rise to a large number of objections and have not yet been determined.

Item No.
2

The listed building consent application which is the subject of this report has been submitted in order to verify whether the existing original flat entrance doors, can be successfully upgraded and certified to meet fire safety standards.

8. THE PROPOSAL

Listed building consent is sought for the removal and replacement of the entrance doors to three empty properties at Flats 54, 67 & 89 to burn test and evaluate current fire resistance of the existing doors to inform the door renewal programme.

The burn testing is proposed to be undertaken on two doors, one an unaltered original four glass panelled hardwood door and frame, and the other an upgraded original door and frame. The door to Flat 89 will be left and only removed if testing a third door is absolutely necessary.

Details of the replacement doors have not been provided as part of this application, as a suitable fire compliant door design has not yet been agreed. Therefore, a condition is recommended to secure details of the replacement doors, which will be required to closely replicate the original doors, in terms of joinery details and furniture.

9. DETAILED CONSIDERATIONS

9.1 Townscape, Design & Heritage Impact

Legislative & Policy Context

The key legislative requirements in respect to designated heritage assets are as follows:

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the LBCA Act') requires that "*In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*"

Furthermore Chapters 12 and 16 of the NPPF require great weight be placed on design quality and the preservation of designated heritage assets including their setting. Chapter 16 of the NPPF clarifies that harmful proposals should be clearly and convincingly justified and should only be approved where the harm caused would be clearly outweighed by the public benefits of the scheme, including where appropriate securing the optimum viable use of the heritage asset, taking into account the statutory duty to have special regard or pay special attention, as relevant. This should also take into account the relative significance of the affected asset and the severity of the harm caused. Key consideration is also given to policy 38, 39 or 40 of Westminster's City Plan 2021

Policy 38 Design Principles (A) states that new development will incorporate exemplary standards of high quality, sustainable and inclusive urban design....(B) respond to Westminster's context by positively contributing to Westminster's townscape and streetscape.

Policy 39 Westminster's Heritage, part (G) states that: Works to listed buildings will 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.

Proposals

A Fire Strategy Report by Lawrence Webster Forrest commissioned by United Living on behalf of the City Council has identified that the entrance doors to individual flats within Parkinson House are likely non-compliant in terms of fire safety and will likely require upgrading or replacement to make them fire safe. This is why planning and listed building consent applications (23/00132/COFUL and 23/00133/COLBC) submitted in January 2023 propose the wholesale replacement of flat entrance and other communal doors within the building. However, following engagement with residents and in response to concerns raised about the significant loss of historic fabric, the applicant has decided to test the existing doors to confirm their fire rating. Whilst it is assumed that the existing doors will fail, the testing is to establish their current rating and to set a baseline. Testing an upgraded door, is to establish whether an upgraded door will meet fire safety standards and could therefore be certified. If both the existing door and upgraded door cannot meet fire safety standards, the intention is that this outcome will justify the proposed replacement of all the doors under applications 23/00132/COFUL and 23/00133/COLBC.

The burn testing will be undertaken to both an unaltered original 4 glass panelled hardwood door and frame as well as an upgraded door and frame. The doors and frames to Flats 54 and 67 (which have already been removed without listed building consent) will be tested to British Standard EN 1634 by Warrington Fire, an independent UKAS accredited Laboratory and leading provider of fire safety design, testing, certification and inspection. They are impartial and independent of Westminster City Council and United Living.

It is acknowledged that two doors and frames have already been removed and temporary flush panel doors installed in their place, resulting in unauthorised works to the listed building. The applicant has confirmed that the door to Flat 89 will be left and only removed if testing to a third door is absolutely necessary.

Conditions are recommended requiring the submission and approval of a report detailing the results of the fire testing; details of the permanent replacement doors which must match closely the original doors in terms of joinery details and; requiring the approved replacement doors to be installed within six months of the date of this consent.

Assessment of Harm

The entrance doors to Flats 54, 67 and 89, which are located on the second, third and fourth floors of Parkinson House, are original four panelled glazed hardwood doors (in black). The doors attribute to the building special architectural interest, being original architectural features and therefore contribute to its significance. Their removal for fire testing is expected to result in their irreversible damage or complete loss, causing harm to the special interest and significance of the building.

The level of harm caused is considered at the low end of less than substantial, this is partly due to the number of doors affected, being limited to two, but at most three. There are however public benefits; testing the doors would confirm whether the existing doors could be upgraded and certified, avoiding the wholesale removal and replacement of the flat entrance doors within Parkinson House, which would ultimately result in a greater level of harm.

9.2 Assessment of Planning Balance

The proposal is considered to cause less than substantial harm to the listed building. The harm would be caused by the loss of original fabric. The level of harm caused would be at the lower end of less than substantial.

Paragraph 208 of the NPPF states that where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the 'public benefits' of the proposal, including optimising its optimum viable use. 'Public benefits' could be anything that delivers economic, social or environmental progress as described in the NPPF. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public to be genuine public benefits.

When undertaking this weighing exercise, the Sub-Committee must fulfil its statutory duties within Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as set out within Section 9.4 of this report) and give great weight to the conservation of heritage assets, irrespective of the degree of harm. Any harm needs to be clearly and convincingly justified.

Although the works are relatively minor, they have resulted in some low level 'less than substantial heritage harm' because these original doors contributed to the significance of the building. However, the applicant has clearly justified the loss of the doors and it does generate notable public benefits, namely, to improve fire safety and potentially avoid the removal of a larger extent of original fabric and loss of significance.

The public benefits summarised above would be significant. Consequently, they are considered to be sufficient to outweigh the low level 'less than substantial heritage harm,' in compliance with paragraph 208 in the NPPF. Furthermore, the heritage harm has been kept to the minimum necessary to deliver the proposed development and the public benefits that flow from it. For these reasons, clear and convincing justification has been demonstrated for the harm caused to the designated heritage assets, in compliance with paragraph 206 of the NPPF.

10. Conclusion

This report has considered the material planning issues associated with the proposed works in conjunction with all relevant national, regional and local planning policy, and has also considered the weight to be attributed to the public benefits and harm that would arise from the scheme. Having regard to this assessment, it has found that the proposed works are acceptable.

Item No.
2

Accordingly, the proposed development would be consistent with the relevant policies in the City Plan 2019-2040, the London Plan 2021, the requirements of the NPPF and the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990. It is recommended that conditional listed building consent is granted.

(Please note: All the application drawings and other relevant documents and Background Papers are available to view on the Council's website)

<p>IF YOU HAVE ANY QUERIES ABOUT THIS REPORT PLEASE CONTACT THE PRESENTING OFFICER: AMANDA JACKSON BY EMAIL AT ajackson@westminster.gov.uk</p>

11. KEY DRAWINGS

EXISTING SECOND FLOOR PLAN
Scale 1:100

EXISTING FIRST FLOOR PLAN
Scale 1:100

LEGEND
 DOOR & FRAME TO BE REMOVED & BURN TESTED

PLANNING ISSUE

PL 1	2025-UL-PAR-SPR-DIWG-A-101	PL3
PL 2	2025-UL-PAR-SPR-DIWG-A-101	PL3
PL 3	2025-UL-PAR-SPR-DIWG-A-101	PL3
PL 4	2025-UL-PAR-SPR-DIWG-A-101	PL3
PL 5	2025-UL-PAR-SPR-DIWG-A-101	PL3

united living
property services

City of Westminster

PROJECT
PROPOSED FIRE DOOR REPLACEMENT TO PARKISON HOUSE
TACHBROOK STREET,
LONDON W1V 2GB

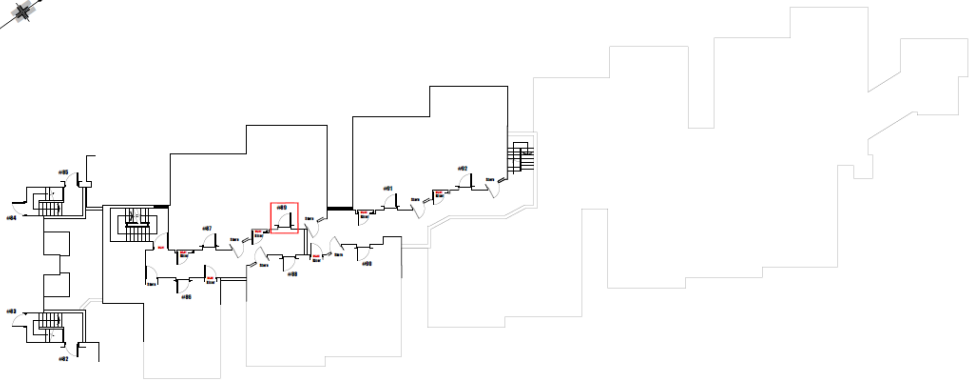
DATE
EXISTING FIRST & SECOND FLOOR COMMUNAL PLANS

2025-UL-PAR-SPR-DIWG-A-101 PL3

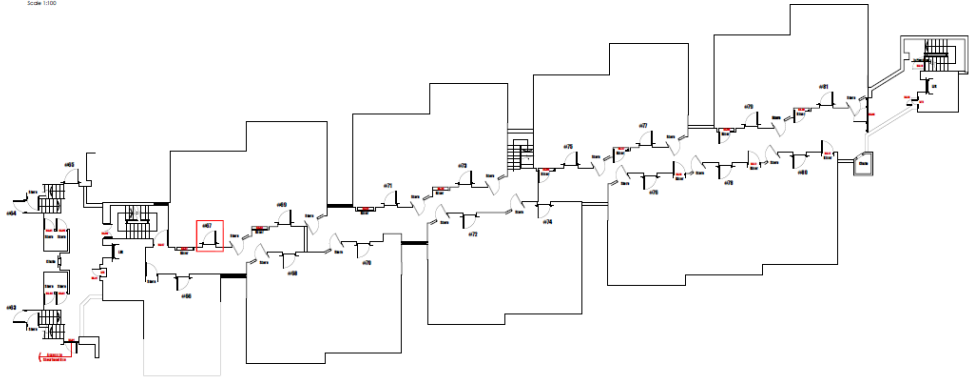
PROJECT 2025 **SCALE** 1:100 (A1) **DATE** Aug 2022

JD GLAYTON Ltd. BUILDING DESIGN
BUILDING SURVEYING
BUILDING SERVICES

020 7324 0000 | 0203 180 100
8, 87th Street | London, E16 2RN, UK



EXISTING FOURTH FLOOR PLAN
Scale: 1:100



EXISTING THIRD FLOOR PLAN
Scale: 1:100



This drawing is prepared solely for design and planning purposes. It is not intended or suitable for other building regulations or construction purposes and should not be used for such.

LEGEND
 DOOR & FRAME TO BE REMOVED & FIRE TESTED

PLANNING ISSUE	
PL 1	2025-UL-PAR-OPP-DWG-A-102
PL 2	2025-UL-PAR-OPP-DWG-A-102
PL 3	2025-UL-PAR-OPP-DWG-A-102



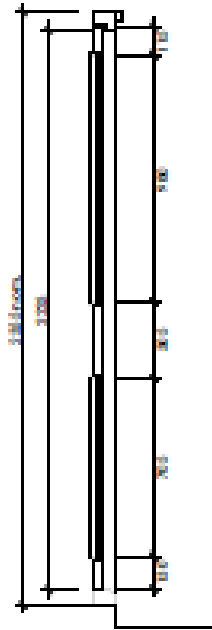
PROJECT
 PROPOSED FIRE DOOR REPLACEMENT TO
 PARENSON HOUSE
 TACHBROOK STREET,
 LONDON SW1W 2GB

DATE
 2025-UL-PAR-OPP-DWG-A-102
 PLS

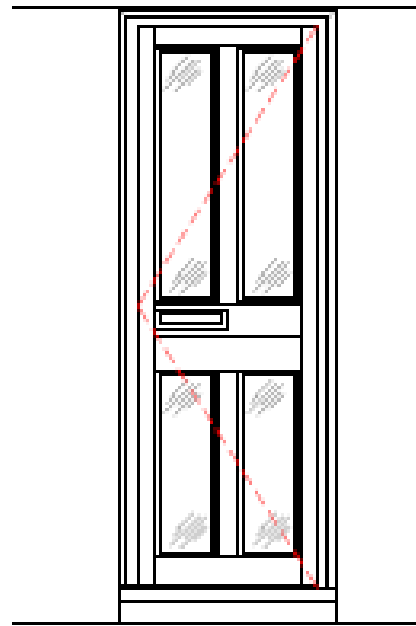
DATE
 2025
 1:100 (A1)
 Aug 2022

**JD CLAYTON Ltd. BUILDING DESIGN
 BUILDING SURVEYING
 DRAFTING SERVICES**

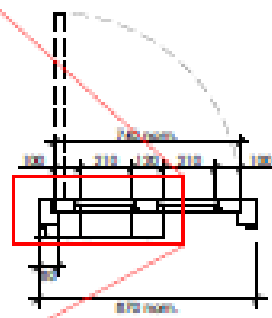
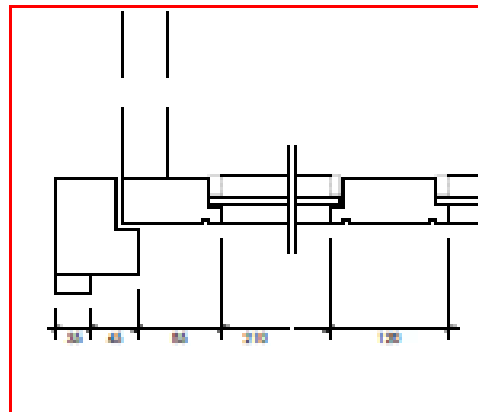
5 NORTH AVENUE | WIMBORNE | DORSET | BH15 1SD
 01752 824444 | 01752 824444 | info@jdclayton.com



**A - EXISTING FLAT ENTRANCE
DOOR SECTION**
Scale 1:20



**A - EXISTING FLAT ENTRANCE
DOOR ELEVATION**
Scale 1:20



**A - EXISTING FLAT ENTRANCE
DOOR PLAN**
Scale 1:20

Item No.
2

DRAFT DECISION LETTER

Address: Parkinson House, Tachbrook Street, London, SW1V 2QB

Proposal: Removal and replacement of three flat entrance doors at Flats 54, 67 & 89.

Reference: 24/04345/COLBC

Plan Nos: 20205-UL-PAR-SPP-DWG-A-101 rev. PL3; 20205-UL-PAR-SPP-DWG-A-300 rev. PL4; 20205-UL-PAR-SPP-DWG-A-102 rev. PL3; 20205-UL-CHA-SPP-DWG-A-400 rev. PL1; three un-numbered photographs of the doors. For information only: Design and access statement; Sustainable design statement; Heritage statement.

Case Officer: Jennie Humphrey **Direct Tel. No.** 07866040589

Recommended Condition(s) and Reason(s)

- 1 The works hereby permitted shall be carried out in accordance with the drawings and other documents listed on this decision letter, and any drawings approved subsequently by the City Council as local planning authority pursuant to any conditions on this decision letter.

Reason:

To protect the special architectural or historic interest of this listed building. This is as set out in Policy 39 of the City Plan 2019 - 2040 (April 2021) and paragraph 2.4 of our Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings. (R27BE)

- 2 All new work and improvements inside and outside the building must match existing original adjacent work in terms of the choice of materials, method of construction and finished appearance. This applies unless differences are shown on the approved drawings or are required in conditions to this permission. (C27AA)

Reason:

To protect the special architectural or historic interest of this building and to make sure the development contributes to the character and appearance of the Lillington and Longmoore Gardens Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R27AC)

- 3 Following the completion of the fire testing hereby approved, you must submit a written report detailing the results of the tests carried out.

Reason:

To protect the special architectural or historic interest of this building and to make sure the development contributes to the character and appearance of the Lillington and

Item No.
2

Longmoore Gardens Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R27AC)

- 4 You must apply to us for approval of details of the following parts of the development:

Detailed drawings (sections and elevations) scaled 1:20 of the replacement doors which must closely match the joinery details of the existing original doors to Flats 54, 67 and 89.

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this listed building. This is as set out in Policy 39 of the City Plan 2019 - 2040 (April 2021) and paragraph 2.4 of our Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings. (R27BE)

- 5 The replacement doors approved pursuant to Condition 4 must be installed within six months of the date of this decision.

Reason:

To protect the special architectural or historic interest of this listed building. This is as set out in Policy 39 of the City Plan 2019 - 2040 (April 2021) and paragraph 2.4 of our Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings. (R27BE)

Informative(s):

- 1 SUMMARY OF REASONS FOR GRANTING CONDITIONAL LISTED BUILDING CONSENT - In reaching the decision to grant listed building consent with conditions, the City Council has had regard to the relevant policies in the National Planning Policy Framework, the London Plan (March 2021), the City Plan (April 2021), as well as relevant supplementary planning guidance, representations received and all other material considerations., , The City Council has had special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses and has decided that the proposed works would not harm this special architectural or historic interest; or where any harm has been identified it has been considered acceptable in accordance with the NPPF., , In reaching this decision the following were of particular relevance:, Policies 38, 39 and 40 of the City Plan 2019 - 2040 adopted in April 2021 and paragraph 2.4 of our Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings.

Item No.
2

- 2 You will need to contact us again if you want to carry out work on the listed building which is not referred to in your plans. This includes: any extra work which is necessary after further assessments of the building's condition; stripping out or structural investigations; and any work needed to meet the building regulations or other forms of statutory control. Please quote any 'TP' and 'RN' reference numbers shown on this consent when you send us further documents. It is a criminal offence to carry out work on a listed building without our consent. Please remind your client, consultants, contractors and subcontractors of the terms and conditions of this consent. (159AA)

Please note: the full text for informatives can be found in the Council's Conditions, Reasons & Policies handbook, copies of which can be found in the Committee Room whilst the meeting is in progress, and on the Council's website.