



Email: planning@camden.gov.uk

17 May 2024

Dear Alex Kresovic

SITE: Former Saville Theatre/ Odeon, 135-149 Shaftesbury Avenue, London, WC2H 8AH

REF: 2024/1005/L

The Twentieth Century Society has been consulted on the above Listed Building Consent application for the

“Part demolition, restoration and refurbishment of the existing Grade II listed building [the former Saville Theatre], roof extension, and excavation of basement space, to provide a theatre at lower levels, with ancillary restaurant / bar space (Sui Generis) at ground floor level; and hotel (Class C1) at upper levels; provision of ancillary cycle parking, servicing and rooftop plant, and other associated works.”

The Society strongly objects to the LBC application on account of the *substantial harm* that would be caused to the significance of the Grade II listed Saville Theatre. This case was reviewed by the Society’s advisory Casework Committee on Monday 13th May and the comments below reflect the committee’s response.

The former Saville Theatre was built in 1930-31 to designs by TP Bennett & Son for AE Fournier and was one of the largest theatres in London’s West End when it opened. Built from a steel frame, the building reaches five storeys and is faced in banded rusticated stone and brickwork. Running along its principal elevation at a low level is a dynamic frieze by the sculptor Gilbert Bayes representing ‘Drama through the Ages’. It is an architecturally sophisticated and historically important interwar theatre building and was Grade II listed in 1998.

As a Grade II listed building, the local authority should be mindful of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which state that, in the decision-making process on applications affecting listed buildings, “the local planning authority [...] 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.”

The application needs to be assessed in relation to paragraph 205 of the NPPF which requires that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation...”

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In addition, paragraph 206 of the NPPF requires that “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings [...] should be exceptional”.

Paragraph 207 states that: “Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.”

It is the Society’s view that the proposed 6-storey rooftop extension would majorly harm the significance of the Grade II listed building. As noted in the updated list entry, the former theatre is listed partly on account of its ‘Architectural Interest’, recognising “the quality of the architectural composition, *its restrained and carefully proportioned* form specially designed to integrate the purpose-designed sculptural work by Gilbert Bayes” (our emphasis). The addition of 6 storeys to the building’s roof would drastically change its proportions and appearance, here with seriously detrimental impact. Faced in a combination of bronze-coloured framed glass, hit-and-miss brickwork and ceramic tile varying in colour and pattern, the proposed extension would in no way respond to the “restrained” materiality and character of the listed host building. It would be visually disruptive and would take away from the quality of the listed building and its integrated artwork.

The applicant proposes to retain the principal and return elevations but to completely strip-out and remodel the interiors and to demolish and rebuild the rear (north) elevation. This is effectively a façade retention scheme as everything but the key elevations would be removed. While we accept that the building’s interiors have undergone major change and refurbishment resulting in the loss of much of the original plan, finishes and fixtures, any original layout and fabric that does survive inside the building would be completely and irreversibly lost as a result of the current application. Any evidence remaining within the interiors that references the building’s historic use would be lost.

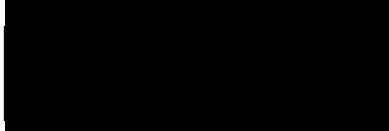
The Society has no objections to the proposal to convert the former theatre into a hotel and theatre in principle but the proposed approach is entirely unacceptable.

In the Society’s view, the proposed extent of demolition work and extension would amount to *substantial harm* to the listed building’s significance. We firmly believe that the harm caused would not be mitigated by the handful of heritage benefits that would be delivered as part of the scheme, including the proposed repair work to the building fabric and frieze, the reinstatement of the original design of the entrance canopy and arch, and reintroduction of the original theatre use into the building at basement level. These positive outcomes could be achieved through a much more conservation-led scheme.

The Society maintains that the application would cause *substantial harm* to the listed building's significance. We strongly believe that it would be possible to convert the building for reuse in a way which better conserves the listed building's significance. The Society therefore strongly objects to these proposals and recommends that the council refuses this damaging application.

We hope that these comments are of use to you. We would be grateful if you could please inform us of your decision on this application.

Yours sincerely,



Coco Whittaker

Head of Casework

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Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the *Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

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