



BUILT HERITAGE STATEMENT

External Works

Site Address

Lethaby Building

On behalf of

Grange Hotels

Date

September 2019

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INTRODUCTION

- 1.1 This Built Heritage Statement has been researched and prepared by CgMS Heritage, part of the RPS Group, on behalf of the applicant in support of the proposed external repair and investigation works at the Lethaby Building of Southampton Row, henceforth known as the 'Site'.
- 1.2 The Site is located in the London Borough of Camden on the eastern side of Southampton Row, which comprises the Lethaby Building (the former Central Saint Martins School), which is Grade II* listed, and is located in Kingsway Conservation Area.
- 1.3 This report makes reference to the relevant legislation contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and both national and local planning policy. In addition relevant Historic England guidance has been consulted to inform the judgements made. Relevant information, including the listing citations for the relevant heritage assets have also been consulted in preparing this Built Heritage Statement. The conclusions reached in this report are the result of detailed historic research, a walkover survey of the Site and the application of professional judgement.

2.0 LEGISLATIVE AND PLANNING POLICY FRAMEWORK

- 2.1 The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon '*heritage assets*'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.

Legislation

- 2.2 Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.3 Section 69(1) of the Act requires LPAs to '*determine areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance*' and to designate them as conservation areas. Section 69(2) requires LPAs to review and, where necessary, amend those areas '*from time to time*'.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, February 2019)

- 2.4 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.
- 2.5 It defines a heritage asset as a: '*building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest*'. This includes both designated and non-designated heritage assets.
- 2.6 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking.

It emphasises that heritage assets are '*an irreplaceable resource, and should be conserved in a manner appropriate to their significance*'.

- 2.7 For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires LPAs to take this assessment into account when considering applications.
- 2.8 Under '*Considering potential impacts*' the NPPF emphasises that '*great weight*' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.
- 2.9 Paragraph 195 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 196 requires this harm to be weighed against the public benefits of the proposed development.

National Guidance

Planning Practice Guidance 2019 (DCLG)

- 2.10 The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.
- 2.11 Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

Department for Digital, Culture, Media and Sport

Principles of Selection for Listed Buildings (published March 2010, Revised November 2018)

- 2.12 Section 1 of the 1990 Act imposes a duty on the Secretary of State to compile or approve a list or lists of buildings of special architectural or historic interest ('listed buildings') as a guide to planning authorities when carrying out their planning functions. This document sets out the statutory criteria that the Secretary of State uses.
- 2.13 Architectural Interest is defined as: To be of special architectural interest a building must be of importance in its design, decoration or craftsmanship. Special interest may also apply to particularly significant examples of building types or techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms. Engineering and technological interest can be an important consideration for some buildings. For more recent buildings in particular, the functioning of the building (to the extent that this reflects on its original design and planned use, where known) will also be a consideration. Artistic distinction can also be a factor relevant to the architectural interest of buildings and objects and structures fixed to them.
- 2.14 Historic Interest: To be able to justify special historic interest a building must illustrate important aspects of the nation's history and / or have closely substantiated historical associations with nationally important individuals, groups or events; and the building itself in its current form will afford a strong connection with the valued aspect of history.
- 2.15 Other criteria that may be also be taken into account are Group Value, Fixtures and Features of a building, curtilage buildings and the character or appearance of conservation areas.
- 2.16 The document also outlines general principles including age and rarity including buildings less than 30 years old, aesthetic merits, selectivity and national interest. It also notes that the state of repair is not usually a relevant consideration.

Overview: Historic Environment Good Practice Advice in Planning

- 2.17 The PPS5 Practice Guide was withdrawn in March 2015 and replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England. *GPA1: The Historic Environment in Local Plans* provides guidance to local planning authorities to help them make well informed and effective local plans. *GPA2: Managing Significance in Decision-Making* includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. *GPA 3: The Setting of Heritage Assets* replaces guidance published in 2011. These are complemented by the Historic England Advice Notes in Planning which include *HEAN1: Understanding Place: Conservation Area Designation, Appraisal and Management* (February 2016), *HEAN2: Making Changes to Heritage Assets* (February 2016), *HEAN3: The Historic Environment and Site Allocations in Local Plans* (October 2015), and *HEAN4: Tall Buildings* (December 2015).

GPA1: The Historic Environment in Local Plans (March 2015)

- 2.18 This advice note focuses on the importance of identifying heritage policies within Local Plans. The advice echoes the NPPF by stressing the importance of formulating Local Plans based on up-to-date and relevant evidence on economic, social and environmental characteristics and prospects of the area, including the historic environment.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

- 2.19 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:
- 1) Understand the significance of the affected assets;
 - 2) Understand the impact of the proposal on that significance;

- 3) Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- 4) Look for opportunities to better reveal or enhance significance;
- 5) Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
- 6) Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

HEAN2: Making Changes to Heritage Assets (February 2016)

- 2.20 The purpose of this document is to provide information in respect of the repair, restoration and alterations to heritage assets. It promotes guidance for both LPAs, consultants, owners, applicants and other interested parties in order to promote well-informed and collaborative conservation.
- 2.21 The best way to conserve a building is to keep it in use, or to find an appropriate new use. This document states that *'an unreasonable, inflexible approach will prevent action that could give a building new life...A reasonable proportionate approach to owners' needs is therefore essential'*. Whilst this is the case, the limits imposed by the significance of individual elements are an important consideration, especially when considering an asset's compatibility with Building Regulations and the Equality Act. As such, it is good practice for LPAs to consider imaginative ways of avoiding such conflict.
- 2.22 This document provides information relating to proposed change to a heritage asset, which are characterised as:
- Repair;
 - restoration;
 - addition and alteration, either singly or in combination; and,
 - works for research alone.

Strategic Policy

The London Plan: The Spatial Development Strategy for London Consolidated with Alterations since 2011 (Greater London Authority (GLA), March 2016)

- 2.23 Adopted in March 2016, policies set out in this document are operative as formal alterations to the London Plan, the Mayor of London's spatial development strategy, and form part of the development plan for Greater London. In particular, this document encourages the enhancement of the historic environment and looks favourably upon development proposals that seek to maintain heritage assets and their setting.
- 2.24 Policy 7.8 Heritage Assets and Archaeology provides the relevant policy with regards to development in historic environments and seeks to record, maintain and protect the city's heritage assets in order to utilise their potential within the community. It states that 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.'
- 2.25 Policy 7.8 also further supports Policy 7.4 by requiring LPAs to formulate policies that seek to maintain and enhance the contribution of built, landscaped and buried heritage assets to the environmental quality, cultural identity and economy, as part of managing London's ability to accommodate change and regeneration.

Local Planning Policy

- 2.26 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, the current Development Plan Policy and by other material considerations.

Camden Local Plan (adopted 2017)

- 2.27 The Camden Local Plan sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to have robust, effective and up-to-date planning

Policy D2 Heritage

- 2.28 The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 2.29 Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or 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;
 - b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 - c. conservation by grant-funding or some form of 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.
- 2.30 The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- 2.31 Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:
- i. resist the total or substantial demolition of a listed building;
 - j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
 - k. resist development that would cause harm to significance of a listed building through an effect on its setting.

3.0 HISTORIC BUILT ENVIRONMENT APPRAISAL

Site Description

- 3.1 The original early twentieth century listed building consists of a five-storey structure with a main focal point facing north-west onto the intersection of Southampton Row and Theobald Row. There is a long front of 14 windows to Southampton Row, a prominent canted corner to Southampton Row junction and a short return of six windows to Theobalds Road and three to Fisher Street. The base is of Cornish granite and upper storeys of Portland stone with a lead roof. The façade of the canted corner facing Southampton Row has enriched treatments with various styles of windows and a prominent high ogee double dome in lead over the cornice. This corner serves as one of the main entrances to the building and due to its protruding nature, height and decorative features provides a strong focal point to the local streetscape, which is further enhanced by the presence of a small plaza in front of the building. The school was extended towards the rear of the building during the latter half of the twentieth century; however, these sections remain unlisted and are currently treated as being of low historical or architectural importance.
- 3.2 Internally, the entrance area, from the corner of Southampton Row, serves as a node from which four key routes through the building diverge. The first allows exit onto the plaza at Southampton Row, then two corridors heading north east and south respectively lead centrally through the building. A fourth route leads diagonally through the open reception area to the rear of the building. On the upper floors a similar outline continues whereas the basement presents a more compartmentalised floor plan.

Historic Development

- 3.3 The Central School of Arts and Crafts was opened by London County Council in Regent Street in November 1896 with the purpose of providing specialist art teaching for workers in craft industries and allowing art scholars and students from local schools to work with established artists. Historically, the school is closely associated with William Lethaby, one of the pivotal figures of the Arts and Crafts movement during the late Victorian and Edwardian era, who played a key role in its foundation. Known as an architect, educationalist and conservationist, Lethaby was joint principal of the school between 1896 and 1911 and also contributed to

the design of the new, purpose-built facility on Southampton Row. The school moved into the new premises in September 1908 and remained an important public centre for arts, crafts and design education in London. The school became part of the London Institute in 1986 and merged with Saint Martin's School of Art to form Central Saint Martin's College of Arts and Design in 1989. The school vacated the premises on Southampton Row in 2011. It has been designated as a Grade II* listed building since 1982, making it a particularly important building of special interest.

Significance

- 3.4 The historic fabric is significant to varying degrees and is influenced by factors including architectural quality, intactness, historical associations and representativeness. The Lethaby Building is remarkably intact in terms of the legibility of the original plan form and materiality which is testament to its robust design and fitness for purpose during its life as an art school and training college. Significance diagrams have been produced by CgMs, now part of the RPS Group, which have been considered in relation to the historic fabric, specialist decorations and the overall cohesiveness of each space.
- 3.5 The building fronts onto Southampton Row and positively contributes to the streetscene. The majority of the buildings within the area were constructed in a relatively short period of time between 1900-1922. Therefore, the area holds a series of larger scale buildings in a neo-classical style, mostly uniform in materials, scale and massing, which provide complete examples of large-scale Edwardian architecture. Many of the buildings have shops on the ground level and offices on the upper levels.
- 3.6 Significance is principally derived from the historical and architectural interest of a purpose built art school in the early twentieth century.

4.0 PROPOSALS AND ASSESSMENT OF IMPACT

Proposals

4.1 The proposed works have been outlined in the Schedule of External Works and with detailed drawings in the Statement of Need as provided by Walsh, who are appointed as specialist structural engineers. The proposed repair and investigation works are required to assess the external facades; to support the extended design life of the building; and to establish the structural capacity of the existing building. The proposed works can be grouped into those relating to stone repair, roof repair and cleaning. Walsh note that due to the age of the building and the evidence of deterioration of materials and cracking, investigation works are also necessary as part of routine maintenance and repair of the building, especially in considering the potential for uses of the building in the future.

4.2 Walsh carried out a visual inspection of the building and found a number of areas of concern, requiring further investigation. As outlined in their report, investigation works have been led by the detection of surface spalling/cracking of concrete, cracks or fractures of steelwork, surface crazing and rust. Drawing number 4878-WAL-SW-ZZ-DR-5-2700_PO1 shows:

4.2.1 The potential locations of core drilled holes in masonry walls required to carry out materials testing and to confirm thickness of the walls; and

4.2.2 Areas of surface crazing and cracking where render will be removed to investigate whether, and to what extent, any cracking propagates through masonry walls.

The proposed works include the removal of the lead cladding to the main dome on the roof at the corner of Southampton Row and Theobalds Road. This will allow a full structural inspection of any failures to the roof fabric.

4.3 The extent of potential damage is unknown with recent nearby infrastructure works that may have accelerated the rate of deterioration. Despite monitoring during construction, effects on the structural integrity of building may have been caused through ground vibrations. Further increasing the need for investigative works.

Assessment of Impact

All locations are external and have been carefully selected to minimise significant and historic fabric being removed. The locations have been chosen by cross referencing the significance drawings, produced by CgMs now part of RPS Group, to minimise harm to historic fabric. A comprehensive window survey will be undertaken to assess condition and promote repair of individual windows.

- 4.4 Where appropriate, specialist contractors will be appointed to make good the investigation works in order to get the best match to the existing material and ensure a like for like repair including the use of lead cladding on the roof dome to match the existing. Repair timeframes will be determined on a case by case basis, as it will be dependent on the condition of what is uncovered.
- 4.5 As noted, significance has principally been found to derive from the historical and architectural interest of a purpose-built art school in the early twentieth century. All works are considered necessary to safeguard the future of the structure. Although elements of historic fabric will have to be removed with care, the report from Walsh demonstrates that appropriate consideration and methodologies have been proposed to ensure these works will be restored and not impact the historic or architectural interest of the building.
- 4.6 The potential for localised harm to historic building fabric is minor in nature as the investigations are repairable or reversible and all are balanced by the knowledge that will be gained from the investigations and the inherent benefits of conservation standard repairs. This is an opportunity to gain a more thorough understanding of the building fabric which will identify the condition and remaining design life of the building's exterior fabric and structural system
- 4.7 The repairs to the roof are considered necessary as part of the normal cycle of maintenance. The opportunity to remove fabric and inspect the substructure coincides with the natural life cycle of the cladding fabric. Wherever possible the existing lead will be re-used.

5.0 CONCLUSION

- 5.1 This Built Heritage Statement has been prepared in order to assess the potential impact on the historic built environment arising from the proposed intrusive fabric investigations to determine the level of external works requires to ensure the Site's structural capacity and the durability of existing claddings.
- 5.2 This Built Heritage Statement meets the requirements of the NPPF and local planning policy.
- 5.3 The very low level of potential harm to significance, derived from localised removal of the historic fabric, is mitigated by the reversibility of the investigations and the opportunity to gain a more comprehensive understanding of the condition and fitness of the building's structural system and external claddings, including windows.

SOURCES

- 1/ Assessment of Existing Structure, Walsh report February 2019
- 2/ Walsh drawing set : 4878-WAL-SW-ZZ-DR-S-2700_P01 showing locations of proposed investigation

