



Ms Laura Hazellton
London Borough of Camden
5 Pancras Square
London
N1C4AG

Direct Dial: 02079733802

Our refs: ND22, ND23, ND24 and ND25

28 April 2020

Dear Ms Hazelton,

Arrangements for Handling Heritage Applications Direction 2015

SLADE SCHOOL OF ART, NORTH WING GOWER STREET LONDON WC1E 6BT Application Nos 2020/1621/P, 2020/1623/P, 2020/1630/L & 2020/1635/L

Thank you for your letters of 8 April regarding the above applications for listed building consent and planning permission. Due to current restrictions we have not been able to visit the site, but on the basis of the information available to date we offer the following advice to assist your authority in determining the applications.

Historic England Advice

The Slade School of Art occupies the North Wing of the Grade I listed University College (University of London). The South and North Wings were built in 1869-76 and 1870-81 respectively, designed by T Hayter Lewes as sympathetic additions to the monumental composition of the original 1827 Wilkins Building, all facing the Front Quadrangle. Each two storey wing is of 13 bays with the central bay forming a semi-rotunda with Corinthian columns.

The proposals are for external refurbishment, repair and maintenance works to upgrade thermal performance; the works are divided into Scope A (2020/1621/P & 2020/1630/L) and Scope B (2020/1623/P & 2020/1635/L). Both propose replacement roof lights to roofs 4-7; window repairs, upgrades and some replacements; roof repairs; light cleaning; and the erection of scaffolding. Scope A proposes repairs to roofs 9-13 and 17, whereas Scope B proposes to replace roof lights and lanterns to roofs 9-13 and install insulation to existing slate and asphalt roofs.

Paragraph 193 of the National Planning Policy Framework states that when considering impacts on the significance of a designated heritage asset, 'great weight' should be given to the asset's conservation (the more important the asset, the greater the weight should be), irrespective of the degree of harm caused. Paragraph 194 requires any harm caused to be clearly and convincingly justified. Where proposals would lead to less than substantial harm, paragraph 196 requires the harm caused to be weighed against the public benefits of the proposal.

Overall, we welcome the proposed repair and refurbishment works, and the admirable ambition to significantly improve the building's thermal performance.





Regarding the proposed roof works, the existing rooflights appear to largely date from the 1970s and we therefore have no concerns with their proposed replacement with double and triple glazed units. Similarly, we have no concerns with the principle of installing breathable insulation materials within certain roofspaces, however we do not consider the proposed wholesale replacement of existing slate roofs as set out in the Scope B works to be wholly justified within the application and question why this insulation could not be installed from within the existing roofspaces.

Limited justification has also been provided regarding the extent of the proposed stone window sill replacement and re-facing works to the front elevation. We recommend that your authority carefully considers this element of the works to limit unnecessary intervention and possible loss of historic fabric. We also recommend that you require samples as standard for the proposed stone cleaning.

Lastly, we note that the proposed joinery repairs are using a system called 'Repair Care', which uses a resin filler as opposed to traditional joinery repairs.

Historic England guidance on the Care, Repair and Upgrading of Timber Windows (2017) discusses resin repairs, stating that 'the long-term performance of resin-repair systems is uncertain', acknowledging that their use 'can postpone the replacement of a traditional window'. The guidance recommends that 'If traditional joinery repairs are not possible, it is better to use resins and extend the life of the original window.'

We do not consider the proposed use of resin repairs in place of traditional joinery repairs to have been justified as part of these works, and recommend instead that the latter approach is taken, particularly to sash windows in areas of high significance, unless clear and convincing justification can be provided as to why this is not possible.

Recommendation

Your Authority should take these representations in account and determine the application in accordance with national and local planning policy and in consultation with your specialist conservation advice.

In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

We have drafted the necessary letters of authorisation for your Authority to determine the application as you see fit and have referred these to the National Planning Casework Unit (NPCU) (copy attached). You will be able to issue a formal





decision once the NPCU have returned the letters of authorisation to you, unless the Secretary of State directs the applications to be referred to them.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:
<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Sarah Freeman

Inspector of Historic Buildings and Areas

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cc: Antonia Powell, Senior Conservation Officer

