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1.1. Crawley Borough Council

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Dear Elizabeth and Sallie,

Re: CBC Locally Listed Buildings Consultation Response

We are writing to you on behalf of our clients, the Chichester College Group, in response to your current consultation on proposed changes to Heritage Assets including locally listed buildings as part of the Local Heritage List.

As you are aware, this consultation considers three buildings on the College site located on College Road, Crawley which are proposed for potential Local Listing as:

- Crawley College - Entrance to College Tower (also known as 'The Theatre')
- Crawley College - Four Storey Building (also known as 'D Block')
- Crawley College - Three Storey Building (also known 'Middle Block')

This letter builds on our representations that we have submitted on behalf of our client in response to the Crawley Submission draft Local Plan Regulation 19 (2) consultation dated March 2021 which deal with wider policy issues for the site and our adopted Masterplan.

Our responses demonstrate the reasons why we are raising an objection to the proposed Local Listing of the 2 buildings identified as appropriate for local listing, and these are the Theatre and D- block.

This representation merges comments and feedback from our client, ourselves as Planning agents for CCG and HNW as the College's Architects. We therefore strongly disagree with the assessment conclusions of these two buildings as presented by Place Services, as part of their Non-designated Heritage Asset Review (December 2020) and cited as part of the emerging Local Plan evidence base.

To support our response we have attached the following documents as Appendices:

- A1) Ridge Report 2018 – Stock Condition Survey of Buildings at CCG (including Crawley)
- A2) Further Education Condition Data Collection (FECD) Report 2019 – map of Crawley College site
- A3) FECD Report 2019 – Block/Buildings Report – Crawley College
- A4a) Pictures of Crawley College Theatre (2021) – showing condition

- A4b) Pictures of Crawley College 'D Block' (2021) – showing condition and 2 layouts

.....from the approved Masterplan that clarify the extent of development achievable should the buildings be replaced.

As set out in our response to the draft Local Plan Reg 19(2) consultation, we note that emerging Heritage **Policy HA5: Locally Listed Buildings** would enable us to completely demolish or partially demolish any Locally Listed building on the site where it can be demonstrated that (a) the key features of the original building have been reflected or retained as part of the new development proposals and (b) the merit of the new development proposals would significantly outweigh the merit of retaining the original building in terms of social, economic and environmental benefits to the wider area.

As set out in our Masterplan proposals, we believe that the quality of development proposed to replace these buildings as part of the wider development of the site and supported in the emerging Local Plan as a Key Opportunity Site for development - would significantly outweigh the merit of retaining the poor quality original Theatre and the no longer fit for purpose, poor quality D-block, in line with Policy HA5.

Notwithstanding this, we believe that the assessment is also flawed in reaching a conclusion that the Theatre and D-block meet the necessary criteria to justify their local listing in the first instance.

In addition, we note that the three storey building was removed in the final report published for consultation as being suitable for listing, therefore clarifying that it did not meet the essential criteria, and we believe this demonstrates an inconsistency in the report findings when considered against the 2 poor quality buildings identified for local listing.

In submitting this response, we therefore wish to correct a number of inaccuracies in the Heritage Asset Review and provide commentary around the subsequent potential negative impact of any local listing, on the future development of the wider College site and its ability to support other Local Plan aims as a Key Opportunity site, whilst attracting significant investment into the Town.

We note also that the previous assessment undertaken by Alan Baxter (April 2010) did not recommend any buildings on the College site for local listing and in total identified 13 new buildings to be added to the local list, comparative to the inclusion of around 60 additional buildings proposed as part of the Place Services report (December 2020). This is despite another 10 years of decay and lack of use on the 2 buildings on the campus since that report.

We also note that several of the photographs in the Place Services report appear to have been taken on the College campus. Our client would kindly request that details of when these photographs were taken and be clear of what permissions were obtained to access the College site.

As you will understand, as a College, CCG have strict safeguarding procedures in place which require visitors to sign in when visiting the site and permission to be sought for any photography. The College site is locked and inaccessible at weekends and out of hours so we can only assume that these were taken when the College was open – with the report indicating that this was on Tuesday 18th August 2020. We would therefore like to discuss and arrange any mutually agreed and authorised further site visits with the College to adequately assess, the extent of decay to the buildings proposed. To assist, we have also provided some photos but as the state of the theatre in particular is unsafe, the building is now permanently locked, again adding further

evidence that the building is no longer suitable for use and should be removed as per the aspirations for the wider site redevelopment.

Whilst you will understand our general concerns, we would now like to assist with further detailed comments on each of the buildings, which are set out as follows:.

Building 1. Entrance to Crawley College Tower (TB 01)

Appendix A1 of the Heritage Asset Review (December 2020) includes an assessment of the building known as 'Entrance to Crawley College Town' (the Theatre) on pg. 176-177.

Description: The report details this building as the entrance to the Crawley College Tower whereas this is factually incorrect. This building is not currently used nor to the best of our knowledge has ever been used as the entrance to the Tower or College site. Therefore, the description detailed within the report is inaccurate.

We would describe the building as an old studio Theatre, set above offices/service/storage space with a small door at the side/back of the Theatre leading down narrow steps to the ground floor into internal offices. The Theatre has not been in use for over 12 years and as the reports and photos confirm is in a poor state.

Authenticity: The report describes the building as a 'single significant phase which is largely intact' however, we can confirm that the building has had significant alterations on the ground floor over the years which is now configured into a number of small office spaces and service/storage areas which are separated by stud walls and partitions. Therefore we believe a more accurate descriptor for the buildings authenticity would be 'a single significant phase with significant alterations and adaptations.'

Q: HNW to check and add/review/

We can not confirm if the Theatre was an original feature. However we can confirm that whilst the building is unusual in form, is it not central to the entrance of the College and is not integral to the tower, that has not been suggested for listing. The Theatre access and entrance points are distinct from the Tower, as can be seen from the multiple doors and escape stairs around the outside of the building. Again, many aspects of the external fenestration, in addition to the doors and stairs, such as the windows, facing materials and the concrete panels themselves have both been subject to some alterations in the past, but are all generally in poor condition.

Aesthetic / Architectural Value: The report describes the building as synonymous to Crawley's New Town era development providing a "good example of post-war architecture" and "indicative of a national architectural development (New Towns movement) of the mid-twentieth century." We disagree with this description and would be keen to understand the criteria used to justify this statement.

We note that under the criteria for assessing the significance of a building (on pgs.5-6) *aesthetic / architectural value* is described as "the intrinsic design value of an asset relating to local styles materials or any other distinctive local characteristics." However we would like to understand the evidence has been used in order to consider its architectural merit in this instance as a building described as "indicative of a national architectural development (New Towns movement) of the mid-twentieth century." In our view whilst unusual, it is not intrinsic to local styles as the form is not well read against the main tower, from the north, nor is it a

celebrated example of the new town movement any more than the town hall, or other new town buildings that have been lost or significantly amended.

Elements of the form and style of the building could however be replicated, or reflected in any new development in regard to linear form, texture etc without the need for local listing.

Landmark/townscape value: the report notes that the building sits opposite the old children's library which has also been recommended for local listing and considers that both structures are dominant and unique in their form. Whilst we agree that the building is in the close vicinity of the old children's library, from the road/street level, we cannot see the relevance of the proximity and would refute that the theatre is a dominant structure. Apart from if in a car, the vista of seeing the two sites together and in context is very limited except from an elevated position. We are also aware that as part of the County Buildings demolition planned for this month that the library building is to be lost, further weakening any justification further that the singular theatre building should be retained alone.

Overall Condition: The report notes the condition as 'Good' whereas we believe that the condition is 'Poor/Very Poor'.

We note the pg.6 of the report provides descriptions for each condition (Good/Fair/Poor/Very Bad/Unknown). The description for a building of 'Good' condition is "*Structurally sound, weathertight, no significant repairs required.*"

The upper level of the building has been left unused for over 12 years and is locked and 'out of bounds' to any staff and students because of the College's serious health and safety concerns regarding its use. There is no lift into the theatre and access is via a wooden staircase, suitable only for able-bodied visitors.

The condition of the ground floor is closer to being in a poor/fair condition but not fit for purpose as useable office space.

In 2018, CCG commissioned Ridge to carry out an independent condition survey (see Appendix A1). The tables on page 42 & 43 in particular rate this building as being somewhere between acceptable and poor using the Ridge red / amber / green ratings system. This building has remained untouched for a further 3 years and further decay has occurred.

In April 2019, the Department for Education appointed surveyors to run a "Further Education Condition Data Collection" (FECDC) programme. They produced the attached Appendix A2 "FECDC – Crawley College Drawings" to link data to. Document UID of "TB 01" (Page 178) shows the Theatre. The FECDC programme refers to this area as "FEAH". The Appendix A3 FECDC Block Suitability Questionnaire shows both FEAH as 100% "Category III - which is defined as 'Less than ideal'"

Whilst it remains unclear what the criteria is that has been used to make the assessment of 'Good' for this building, the College estates assessment is that the Theatre building does not meet this criteria of good either from an estate condition perspective nor operationally.

To assist additional photos are provided in Appendix A4a

Crawley College – Four Storey Building (TB 02)

Appendix A1 of the Heritage Asset Review (December 2020) includes the assessment of the Crawley College Four Storey Building (known as D-block) on pg. 178-179.

Description: The report details this building as part of a group of new town buildings that form part of the Crawley College campus opened in June 1958. We mostly agree with the description in this instance although would suggest that whilst the design has elements of Brutalist style, this building does not present a strong example of this design and architectural style.

Brutalist architecture, also known as Brutalism, is an early 20th century modernist movement that primarily included construction with poured concrete. It became a favourable style as it allowed for efficient mass construction and therefore was readily adopted by British designers in the 1950s to reconstruct after the war. Despite having many functional benefits, Brutalist architecture often does not always weather well and therefore commonly doesn't present an aesthetically pleasing façade as the building ages. In damp climates, the concrete can become streaked with water stains and sometimes with moss and lichens, and rust stains from the steel reinforcing bars. This style of architecture is also associated with urban decay due to materials weathering poorly and surfaces being prone to vandalism by graffiti. As an architectural style, it has never been widely well received or welcomed by the public, examples of which are often ill thought of and poorly considered against over architectural styles.

Authenticity: The report describes this building as a 'single significant phase which is largely intact' however we can record that the building has had significant alterations on every floor over the years. This has reflected significant changes in teaching on learning requirements and the poor quality and lack of flexible use of the space as a modern education facility. We therefore believe in more accurate description would be 'a single significant phase with significant alterations and /or extensions.'

To assist please also refer to Appendix A1 of the Place Services report which accepts:

"The original part of the premises dates back to the 1960s and was extended in the late 80s or early 90s. The newer addition benefits from aluminium double glazed windows, as opposed to single glazed sliding windows found in the original section."

Aesthetic/Architectural Value: the Place Services report states that this building presents "a good example of Post-War public architecture" and "is synonymous with Crawley's Post-war development." However, it goes on to state that "Although the building was part of a significant phase of Crawley's development, it is not considered to be an architecturally leading example."

We therefore believe that the wording of this section appears to contradict itself and would agree that this is not a leading example of Post-war public architecture. For this reason we are unsure why the assessment concludes to support its local listing.

The College is committed to working with the Council and the wider OPE on the opportunities to redevelopment the site and provide a key opportunity to expand the easter gateway. However, the retention of D block will impede on the options, and architectural value that could be achieved as a replacement should the block be retained. Again, any redevelopment could replicate or reflect this building in terms of its overall mass and scale without the need for local listing.

Overall Condition: The report notes the building condition as 'Good' whilst we believe that the condition is 'Poor'. The building is in a very poor state of repair and has significant limitations for use. There are significant issues around accessibility in the building related to non-compliance with the 1995 Disability Discrimination Act (DDA). Quite simply, the building is no longer fit for purpose.

In 2018, CCG Commissioned Ridge to carry out an independent condition survey (Appendix A1). The tables on page 42 & 43 in particular rate this building as being somewhere between acceptable and poor using the Ridge red / amber / green ratings system.

Some key areas raised in the report include areas that do not meet current Building Regulation Standards.

In April 2019, the Department for Education appointed surveyors to run a "Further Education Condition Data Collection" (FECDC) programme. They produced the attached Appendix A2 "FECDC – Crawley College Drawings" to link data to. Document UID of "TB 02" (Page 180) shows D Block. The FECDC programme refers to this area as "FEAF". The Appendix A3 FECDC Block Suitability Questionnaire shows FEAF as 100% "Category III" which is defined as 'Less than ideal'

Whilst it remains unclear what the criteria is that has been used to make the assessment of 'Good' for this building has been, the College estates assessment is that D Block building meets this criteria either from an estate condition perspective nor running costs efficiency.

Additional photos to support this are provided in Appendix A4b.

Crawley College – Three Storey Building

Appendix A2 of the Heritage Assets Review includes the assessment of the Crawley College Three Storey Building concluding that this building was not recommended for inclusion on the Local List.

Description: The report details the building as presenting a dominant road facing frontage and a typical example of post-war education buildings. Comparatively, the four Storey building (D-block) was described as having a 'Brutalist style' which we understand to be consistent with post-war British architecture. Therefore, it is unclear what (if any) the key architectural differences are in the description of these two buildings.

Authenticity: The report describes the building as a single significant phase with significant /some alterations and /or extensions. In this instance we agree with this description however, we would argue that the same should also be said for the Theatre and D-block, as stated above. We are not clear on the information that has informed these inconsistent conclusions across the three buildings.

Aesthetic / Architectural Value: Again, the report states that this building is "*a typical example of post-war education and school architecture*" and "*synonymous with Crawley's New Town era.*" However it goes on to state that whilst it is a building of its time "*it is not considered to be a leading example of Post-war public architecture.*" We believe that the wording of this section is consistent with the conclusions also drawn on the aesthetic and architectural value for D-block (as detailed in the previous section of this letter).

We would argue therefore that both the Three storey building noted here (Middle Block) and D Block buildings are both not leading examples of Post-war public architecture and for this reason, we are unsure why there is inconsistency in the assessment which concludes that the three-storey building is not recommended for local listing whilst D-block is recommended for listing.

Overall Condition: The report notes that the building is in 'Fair' condition, comparative to the Theatre Block and D-block which were considered to be in 'Good' condition. However, independent survey reports demonstrate that bot all 3 buildings are in fact in poor condition and not fit-for-purpose for College use.

It is not clear what criteria has been applied to reach a conclusion that the Theatre Block, which has been vacant for 12 years and D-block, which is also in a very poor state of repair and not safe for college use – are both in a 'Good' condition whilst the three storey College building is considered to be in 'Fair condition.'

We would therefore argue that the assessment is flawed and inconsistent and does not provide conclusive evidence to justify the proposed listing of any of the 3 buildings, especially not the Theatre and D-block.

Conclusions

CCG strongly believe that neither the Theatre building nor D-block meet the criteria in the Place Services report and consultation to justify being Locally Listed. We also support that Middle Block should not be locally listed. There are clear inaccuracies within the report and we believe that neither building proposed for listing is of notable Aesthetic/Architectural Value – this is based on independent and specialist assessment of the architecture within the context of the Town. We support the assessment that the other Three Storey building (Middle Block) is not suitable for local listing.

Given this, we would ask CBC to consider the potentially significant and detrimental impact that inappropriate listings could have on CCG's ability to develop a College that is fit for purpose for the local community.

CCG has developed with OPE funding, and in partnership with CBC, exciting plans for the redevelopment of the site apart of the approved Masterplan, and they are s seeking to leverage significant investment in the site for new teaching and learning facilities. These plans hinge on the sale/disposal of the northern part of the site in which these buildings are located. Any negative impact on value, and viability as well as design, will negatively impact on funds to re-invest in the College and has the potential to significantly delay redevelopment plans.

Given our extensive assessment of the surrounding character area and opportunities for delivering a high-quality and sustainable development of the College site as part of our approved Masterplan and in line with emerging Local Policy TC3, we consider it an unnecessary step to Locally List the Theatre, D-block or any other building within the College site at this stage in time.

Therefore, we would request that the Council review the current conclusion drawn in Appendix A1 of the Heritage Assessment and re-consider any proposals to include any buildings on the College site for inclusion on the Local Heritage List.

We are grateful for the opportunity to comment on the Heritage Assets Review and would seek further to engage directly with the Council in regard to this matter.

Should have any further questions please do not hesitate to contact me.



Yours sincerely

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DRAFT

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