

29 September 2023

Delivered via Planning Portal (Ref: PP-12494504)

Edward Hodgson
Development Management
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Ref: GENH3002

Dear Edward,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

PLANNING (LISTED BUILDING AND CONSERVATION AREAS) ACT 1990

TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS) REGULATIONS 2007 (AS AMENDED)

HEAL'S BUILDING, 196 TOTTENHAM COURT ROAD, LONDON, W1T 7LQ

APPLICATION FOR FULL PLANNING PERMISSION, LISTED BUILDING CONSENT AND CONSENT FOR THE DISPLAY OF ADVERTISEMENTS

We write on behalf of our client, General Projects ('the Applicant') to submit an application seeking full planning permission, Listed Building Consent and consent for the display of advertisements to London Borough of Camden ('LB Camden'), in its role as Local Planning Authority ('LPA') for the proposed external and internal alterations works to the Heal's Building at 196 Tottenham Court Road, London, W1T 7LQ ('the site').

With regards to the Listed Building Consent (LBC) due to limitations of the online Planning Portal system, the application form options are currently only for full planning permission and LBC, or full planning permission and advertisement consent. As such, a separate LBC which includes all the proposals included within this application, has been submitted under Planning Portal ref: PP-12494507, and is supported by a Heritage Statement, prepared by Turley.

SUBMISSION DOCUMENTS

The application was submitted via the Planning Portal. The submission comprises the following:

- Application Form;

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12 Roger Street
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- Covering Letter (this document);
- Site Location and Block Plan, prepared by Buckley Gray Yeoman (BGY) and White Red Architects (WRA);
- A suite of Existing, Demolition and Proposed Drawings and Plans, prepared by BGY and WRA;
- Design and Access Statement, prepared by BGY and WRA;
- Full Structural Report for the Proposed Internal DDA Platform Lift, prepared by Webb Yates (included in the Design and Access Statement); and
- Heritage Statement, prepared by Turley.

APPLICATION BACKGROUND AND SITE DESCRIPTION

The site and larger building complex that covers the greater part of the urban block defined by Tottenham Court Road (A400), Torrington Place and Alfred Mews, and which also includes the historic premises of Heal and Son Limited, was first included on the statutory list of buildings of special architectural and historic interest at Grade II* on 14 May 1974. The building incorporates a range of retail and commercial office spaces from lower ground floor to sixth floor the Heal's department store, fronting onto Tottenham Court Road. The site operates under Use Class E with the exception of the existing residential flats within the site (Use Class C3), which are excluded from the proposals.

The site is also located within designated area of the Bloomsbury Conservation Area, and within the shared setting of a number of Listed Buildings along Tottenham Court Road (to the south) and within surrounding streets.

More generally, the site is located within the Tottenham Court area of the West End (an identified growth area under Camden's Local Plan) and the Central Activities Zone (CAZ) (as per the London Plan (2021)). The surrounding area is reflective of the site's CAZ location with the neighbouring buildings being in use for a mix of principally retail and commercial (Use Class E) uses alongside residential uses (Use Class C3) towards Bloomsbury to the east.

The proposed development forms an important element of the Applicant's wider vision to sensitively reinvigorate the use and appearance of the historic Heal's Building. This has been achieved through a phased approach to design, procurement, and delivery of the wider scheme for ongoing refurbishment and careful curation of commercial spaces at the site over the last 2 years. The refurbishment proposals have been delivered through multiple phases under the following approved planning applications:

- **Basement and Ground Floor Heal's Works – Application ref. 2022/1961/L** for the *“Internal refurbishment and alterations to the basement and ground floor level of Heal's and former Habitat spaces including re-opening entrance onto internal courtyard.”* Granted on 29 June 2022.
- **Basement and Ground Floor Alfred Mews Works – Application ref. 2022/2599/P (and supporting LBC ref. 2022/2781/L)** for the *“Refurbishment and external alteration works to the internal courtyard elevation, including opening up of existing openings to original forms, repairs to existing structures, installation of metal framed glazed doors and windows and louvre grilles to existing openings in small inner courtyard.”* Granted on 24 October 2022.

- **Level 6 Works – Application ref. 2022/4084/L** for the *“Internal alterations to sixth floor comprising: removal of partitions, removal of suspended ceilings and light fittings, replacement of flooring, refurbishment of kitchenette and refurbishment of WCs.”* Granted 14 November 2022.
- **Levels 1 and 2 Cat A Office – Application ref. 2022/3692/P (and supporting LBC ref. 2022/4133/L)** for the *“Installation of new louvres and grilles on rear, side and internal courtyard elevations at ground, first, and second floors, new access doors and railings to create a terrace at second floor in internal courtyard, and installation of new plant areas with acoustic screening at first floor level on rear.”* Granted 13 December 2022.
- **Heal’s Entrance – Application ref. 2022/2462/P (and supporting LBC ref. 2022/2465/L)** for the *“Removal of existing metal canopy and existing roller shutter to entrance on Tottenham Court Road elevation and replacement with bronze framed sliding doors bordered by stone pilasters. Installation of bronze ‘Heal’s’ lettering within paving in front of entrance. Formation or matching ‘Heal’s’ lettering to stone fascia on Torrington Place.”* Granted 22 December 2022.
- **Ground Floor Alfred Mews Façade ref. 2022/2084/P (and supporting LBC ref. 2022/2089/L)** for the *“Alterations to Alfred Mews facade, including removal and replacement of roller shutters and installation of new entrance doors and retractable awnings on ground floor.”* Granted on 16 August 2023.

Application Site

For clarity, the stage of works that is subject of this application for full planning permission, LBC and consent for the display of advertisements solely relates to the following parts of the Heal’s Building (application sit boundary shown below in red):

- Parts of Fifth and Sixth Floor Levels;
- External ground floor frontage of the Torrington Place entrance; and
- External ground floor frontage of Alfred Mews.

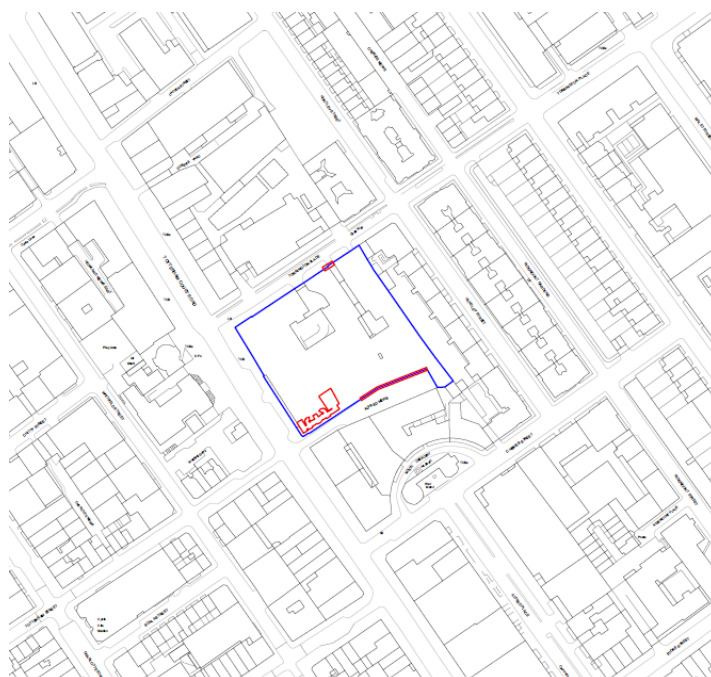


Figure 1: Site Plan showing application boundaries, prepared by BGY

Pre-Application Engagement

Pre-application engagement is valuable for the evolution of a development, and it is recognised in the NPPF (2023) at Paragraph 39 that it has the potential to improve the efficiency and effectiveness of the planning application process for all parties.

A pre-application meeting was held on 26 June 2023 with LB Camden and the Applicant to update the Council on the latest elements of the ongoing refurbishment of the Heal's Building and discuss the next stage of refurbishment works, focusing on the Internal DDA Platform Lift between fifth and sixth floor levels, Torrington Place improvements and Alfred Mews Lighting and Signage.

A follow-up pre-application meeting held on 03 July 2023.

A summary of the key feedback provided below:

- **Internal DDA Platform Lift (Fifth to Sixth floor)** - The proposed internal DDA platform lift was supported in principle and was considered to improve the accessibility of the building. Full structural engineering evidence is requested to be submitted as part of the LBC to satisfy the Council that there would be no harm to the historic fabric of the building.
- **Torrington Place Entrance** - The proposal for a new entrance to the building along Torrington Place, including the replacement canopy and lighting, is acceptable in principle. Using colours and finishes that match those found on the Alfred Mews façade are welcomed. Officers' requested that the use of horizontal transoms is kept to a minimum to retain a string vertical rhythm.
- **Alfred Mews Lighting and Signage** – The principle of the signage is acceptable subject to further details to satisfy the Council that any signage fixtures would not harm the historic fabric of the building. No objection is raised in principle to the swanneck lights and the projecting hanging signs, however these should be located a safe height and distance away from the highway so as not to cause an obstruction to vehicles using the mews. A lighting assessment should be submitted to assess the impact of the lights on the Mews and neighbouring buildings in accordance with the Council's validation requirements.

The Applicant and the architects have considered Officers' helpful feedback and have amended the design proposals where possible. An overview of how the proposals have been amended to meet the Council's requirements is discussed below, whilst the suite of supporting documents set out the full design approach and technical details as noted above.

PROPOSALS

The proposals subject of this application, focus on a series of carefully consider minor refurbishment works to improve the external appearance of the secondary entrances to the building from Alfred Mews and Torrington Place, alongside improvements to accessibility to the upper floor levels of commercial accommodation. Details of each of the proposed works are outlined below.

Installation of new Internal DDA Platform Lift

- Installation of a new internal DDA platform lift between fifth and sixth floor levels, with internal alteration works including the removal of existing toilets and partitions to allow opening for the new lift; and

- Reconfiguration of the existing inaccessible toilets on the fifth floor level to provide a new DDA toilet.

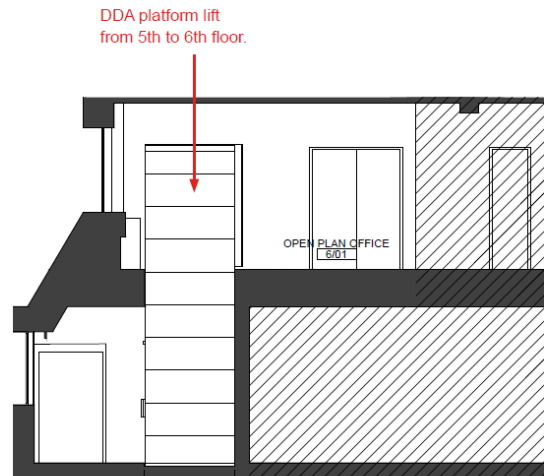


Figure 3: Proposed Section, showing the proposed Internal DDA Platform Lift, prepared by WRA

Torrington Place Entrance

- Redesigning of the existing Torrington Place entrance and frontage, with external alteration works, including the replacement of the existing external cladding materials, including curtain walling and tiling, and refurbishment of the existing concrete fascia;
- Replacement of the existing projecting canopy with a high quality light-box, bronze finished canopy with softly illuminated LED lettering signage;
- Installation of feature external lighting on the column piers and replacement of existing external tarmac paving with new marble/stone paving;
- Installation of new metal framed glazing (doors and windows) to each bay in a Crittall-like style and bronze effect; and
- Together the proposals will enhance the existing entrance off Torrington Place better announcing the new high quality refurbished 'internal street' within which connects both flanks of the site together.



Figure 3: Rendered CGI of the Proposed Torrington Place Entrance, prepared by WRA

Table 1: 'MANUFACTORY' Advert Detail Schedule

Dimensions of sign (height x width x depth) (in m)	0.16 x 1.73 x 0.24
Height from ground to base of the advertisement (in m)	3.74
Maximum projection of the advertisement from the face of the building (in m)	1
Maximum height of any individual letters and symbols (in cm)	16
What materials the sign will be made of	LED signage with bronze trims
Colour	Bronze
Illumination	4554 lumen

Table 2: '22' Advert Detail Schedule

Dimensions of sign (height x width x depth) (in m)	0.16 x 0.24 x 0.20
Height from ground to base of the advertisement (in m)	3.74
Maximum projection of the advertisement from the face of the building (in m)	1
Maximum height of any individual letters and symbols (in cm)	16
What materials the sign will be made of	LED signage with bronze trims

Colour	Bronze
Illumination	4554 lumen

Alfred Mews Frontage – Lighting and Signage

- Installation of 6no. new swan-neck light fittings;
- Installation of 2no. new hanging signs either side of the main entrance; and
- A new painted 'Heal's' sign on the roller shutter.



Figure 4: Alfred Mews Elevation Proposals, prepared by BGY

Table 3: Swan-neck Light Fittings Advert Detail Schedule

Dimensions of sign (height x width x depth) (in m)	0.57 x 0.37 x 0.56
Height from ground to base of the advertisement (in m)	4.22
Maximum projection of the advertisement from the face of the building (in m)	0.75
Maximum height of any individual letters and symbols (in cm)	N/A
What materials the sign will be made of	Heal's Ship Deck Large Bracket Light
Colour	Antique bronze finish
Illumination	Maximum 1055 luminance

Table 4: Hanging Signs Advert Detail Schedule

Dimensions of sign (height x width x depth) (in m)	0.7 x 0.6 x 0.1
Height from ground to base of the advertisement (in m)	2.80

Maximum projection of the advertisement from the face of the building (in m)	0.91
Maximum height of any individual letters and symbols (in cm)	30
What materials the sign will be made of	Metal
Colour	Bright Red (RAL 3028) background with Pure White (RAL 9010) lettering
Illumination	N/A

More specifically, the proposals seek full planning permission, LBC and consent for the display of advertisements for the following development:

“External alteration works to the ground floor frontage of the Torrington Place entrance comprising: the removal and replacement of the existing external cladding materials, refurbishment of the existing concrete fascia, installation of new metal framed glazing, removal and replacement of the existing projecting canopy with a lightbox canopy, installation of external feature lighting, and replacement of existing tarmac paving with new marble/ stone paving and installation of associated LED entrance signage fixed. Installation of 6no. new swan-neck light fittings and 2no. new hanging signs above Alfred Mews façade; together with internal alteration works to comprising the installation of an internal DDA platform lift between fifth and sixth floor levels.”

This Covering Letter should be read in conjunction with the supporting Design and Access Statement (DAS), together with the proposed plans and drawings, prepared by BGY and WRA.

PLANNING POLICY AND ASSESSMENT

A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are statutory Development Plans which seek to guide the decision making process. Section 38(6) of The Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Legislative requirements for works to the Listed Building are set out in the submitted Heritage Statement, prepared by Turley.

The adopted Development Plan for the site comprises:

- The London Plan (2021);
- Camden Local Plan (2017), and
- The Fitzrovia Area Action Plan (FAAP) (2014).

Other policy documents that are material to the consideration and determination of this application for full planning permission, LBC and consent for the display of advertisements include Camden Planning

Guidance (CPG) (which have status as Supplementary Planning Documents), prepared by LB Camden. This includes the following (not an exhaustive list):

- Advertisements CPG (2018);
- Design CPG (2021); and
- Employment Sites and Business Premises CPG (2021).

The Government's national planning policies for England are set out in the National Planning Policy Framework ('NPPF') (2023), and the supporting Planning Practice Guidance ('PPG' or 'NPPG') (last updated 2021), and the National Design Guide (2019) are also material considerations in the determination of planning applications.

Principle of Refurbishment of the Building

The principle of delivering optimised and enhanced office accommodation is supported by Local Plan Policies E1 and E2, as well as London Plan Policy E1. This confirms general protection for existing office space within the CAZ and in principle support for the refurbishment and enhancement of existing office floorspace. The Council's Employment Sites & Business Premises CPG further offers support for the retention and re-provision of employment floorspaces through refurbishment and improvement works.

The proposals will optimise the leasing potential of the site, attract new tenants to the Borough and avoid vacant unused spaces within the building, in response to the market feedback received by the Applicant. Accordingly, the proposals are supported in principle under both the London Plan Policy E1 and Local Plan Policies E1 and E2.

Principle of Minor Alterations to a Listed Building

The Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special regard to be paid to the desirability of preserving the special architectural or historic interest of a Listed Building or its setting.

The NPPF contains guidance in relation to development proposals affecting heritage assets and conservation of the historic environment. In particular, paragraphs 194-195 set out that local planning authorities should identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals, in order to avoid or minimise, conflict between the heritage asset's conservation and any aspect of the proposal.

In addition, London Plan Policies HC1 and HC2 require development affecting heritage assets to conserve their significance, by being sympathetic to that significance and also their settings, and subsequently enhance heritage assets and architectural features that contribute towards local character.

At the local level, Local Plan Policy D1 confirms the Council will seek to secure high quality design in development and requires that development, *inter alia*: respects local context and character; and preserves or enhances the historic environment and heritage assets. Local Plan Policy D2 further notes that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and Listed Buildings. The Policy confirms 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.

The proposals are supported by a Heritage Statement, prepared by Turley. Based on the heritage impact assessment, the Statement concludes the proposed installation of a new internal DDA platform lift

between fifth and sixth floor levels would have minimal impact on the historic fabric, features or significance of the Listed Building, whilst allowing these levels to be accessible inclusively.

The redesigning of the Torrington Place entrance and Alfred Mews frontage to a high quality and use of materials and detailing would represent a significant improvement, responding positively to the history and architectural character of this historic building as well as the wider Heal's Building complex. As such, this element of the proposals would be considered to be an enhancement to the heritage significance of the Listed Building and also its contribution to the surrounding Bloomsbury Conservation Area.

Accordingly, the proposals are considered to be in accordance with Paragraphs 194-195 of the NPPF, Policies HC1 and HC2 of the London Plan and Policies D1 and D2 of the Local Plan.

Design

London Plan Policy D3 (A) confirms all development must make best use of land by following a design-led approach that optimises capacity of sites. London Plan Policies D3 (D) further notes proposals are expected to respond to local context through their layout, orientation, scale, appearance, and shape, with buildings of a high standard of sustainable design and architecture whilst providing active frontages and achieving safe, inclusive environments (in line with London Plan Policy D5).

Similarly, Local Plan Policy D1 states development should secure high quality design which respects and complements the local context and character, is sustainable in design and construction, and contributes positively to the street frontage.

Local Plan Policy C6 is specific to accessibility and states the Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.

Internal DDA Platform Lift

The installation of a new internal DDA platform lift, comprises internal interventions only and will not impact the external appearance or façade of the building. The lift proposals have been carefully designed to provide level access and improve accessibility between fifth and sixth floor levels whilst minimising any adverse impacts to heritage significance of the Listed Building. As noted in the Heritage Statement, the proposals would be delivered through the opening up works to the existing DDA toilet which is of negligible heritage significance. This element of the proposals is therefore in direct accordance with London Plan Policy D3 and Local Plan Policies D1 and C6 through the provision of inclusive access to fifth and sixth floor levels.

Torrington Place Entrance

The proposals will create a visually attractive, welcoming entrance to this element of the Heal's Building complex fronting onto Torrington Place, whilst following the high quality design approach proposed for the Tottenham Court Road (Application ref. 2022/2462/P and 2022/2465/L) and Alfred Mews elevations (Application ref. 2022/2084/P and 2022/2089/L) (such as through the use of metal framed glazing in a Crittall-like style and bronze effect. The proposed design and materiality would represent a significant improvement to the existing façade, and would also respond positively to the history and architectural character of the host 1930s Moderne building, as noted in the Heritage Statement.

Based on the feedback received from the Conservation Officer at the pre-application meetings, the elevation has been re-designed to omit the use of horizontal transoms, thereby strengthen the verticality of the façade rhythm – taking further reference from the existing fenestration across the upper floors of this part of the site. The glazing elements have been extended and the location of the doors have been shifted to match the windows on the upper floors.

Furthermore, the proposals would enhance and reactivate the existing Torrington Place frontage with the new light-box canopy and LED signage providing a high quality and sensitive visual marker for the new upgraded office entrance and wider spaces within. The proposed use of high quality Crittall style glazing will ensure the entrance (and critically the high quality spaces within the building) are legible from the street, thereby enhancing the site's contribution to the Tottenham Court Growth Area and wider CAZ.

The proposals are therefore in accordance with London Plan Policy D3 and Local Plan Policy D1, through the delivery of a more legible, welcoming and attractive entrance experience on Torrington Place.

Alfred Mews Frontage

The proposals will enhance and improve the Alfred Mews frontage (consented under Application ref. 2022/2084/P and 2022/2089/L) by installing additional high quality signage and lighting. The swan-neck lighting fittings have been designed to match the historic precedent in design, shape and size, and it will be in an antique bronze finish to match the existing signage lettering. Similarly, the hanging signs have been designed to reference the historic Heal's signage, whilst incorporating high quality design and materials to mark the newly refurbished Alfred Mews entrance.

As noted in the Heritage Statement, the proposed design and materiality would represent a significant improvement to the consented façade, and would also respond positively to the history and architectural character of this historic building as well as the wider Heal's Building complex.

Accordingly, it is considered the proposals will again deliver a more legible, welcoming and attractive entrance along the Alfred Mews frontage, in compliance with London Plan Policy D3 and Local Plan Policy D1.

Public Safety

With regards to the factors relevant to public safety, the Town and Country Planning (Control of Advertisements) Regulations 2007 (as amended) further state:

- i. The safety of persons using any highway, railway, waterway, dock, harbour or aerodrome;
- ii. Considerations on whether the display of the advertisement in question is likely to obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air; and
- iii. Whether the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

Due to the scale and location of the proposed signage elements, it is considered that none of the factors set out above are relevant in relation to and/or triggered by the proposed signage, nor would they cause a hazard to any nearby highway users or result in any adverse impacts to public safety. The proposed signage will be sensitively illuminated and will not result in an adverse impact or nuisance to the surrounding neighbouring amenity or public highway. Accordingly, the proposed signage is considered to be in full compliance with the relevant provisions contained in London Plan Policies D3 and D8, Local Plan Policy D4 and the Camden's Advertisements CPG (2018).

SUMMARY

Overall, the proposals would constitute high-quality small-scale enhancements to the usability and quality of this important mixed-use building, while conserving and sustaining the significance of the heritage asset and positively contributing to the continued function of the Tottenham Court Growth Area and wider CAZ. Accordingly, on balance the proposals are considered to be acceptable and meets the objective of key Local Plan and London Plan policies as set out above.

We trust this information is sufficient to validate this full planning permission, Listed Building Consent and consent for the display of advertisements application. However, please do not hesitate to contact myself or my colleague Kinari Tsuchida (Kinari.Tsuchida@turley.co.uk) if you have any queries.

Yours sincerely



Samuel Brown
Associate Director

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