

Heritage Statement

Refined Scheme: Heals Building, 196
Tottenham Court Road, W1T 7LQ

September 2023

Contents

1.	Introduction	3
2.	Heritage Asset and Significance	6
3.	Refined Scheme and Likely Heritage Impacts	17
4.	Summary and Conclusions	24
Appendix 1: Baseline Heritage Appraisal		25

1. Introduction

Purpose of this Report

- 1.1 This Heritage Statement report has been prepared by Turley Heritage on behalf of General Projects (our 'Client' and the 'Applicant') to provide a proportionate understanding and appreciation of the significance of the identified built heritage asset(s), and also then to describe the likely heritage impacts of further proposed works of alteration to / development at the Grade II* listed Heals Building complex, 196 Tottenham Court Road (the 'Site'). This report is designed to accompany applications for Planning Permission (PP) and or Listed Building Consent (LBC) and or Advertisement Consent in relation to these various further works / development for this building complex.
- 1.2 Importantly, this scheme has been informed by ongoing and also more recent constructive pre-application engagement with officers at the local planning authority (London Borough of Camden or LBC). This process has included two meetings with officers, held in June and July 2023, and also written feedback provided via email on 13 July 2023.
- 1.3 This report should be read in conjunction with the full scheme design material, as prepared by the architects White Red (WR) in conjunction with Buckley Gray Yeoman (BGY), including the combined Design and Access Statement (DAS). In summary, the further proposed works of alteration to / development for the listed building that are the subject of this / these applications can be summarised as:
 - (i) Proposed DDA compliant platform lift from fifth to sixth floor level of the Heals Building complex (1930s extension), which comprises a refinement to previously approved refurbishment works as part of Phase 1;
 - (ii) Proposed redesign of Torrington Place entrance to another later 1930s element of the building complex (effectively as part of Phase 1A); and
 - (iii) Proposed new signage and lighting to Alfred Mews frontage (as part of Phase 3).
- 1.4 These further scheme refinements form part of a wider vision and strategy by the Applicant to sensitively reinvigorate the use and appearance of this unique collection of built elements that are focussed around the historic Heals store through a phased approach. The strategy for implementation has been approached in a number of discreet phases for the purposes of design work and also subsequently the series of application submissions for PP and or LBC. This has been determined by the large scale and complexity of this building complex and also this project, as well as the continuing evolution of the Client's design brief and tenant requirements since 2021.
- 1.5 For the purposes of this report (and also ease of use) each of the key elements of these proposals for further change to the listed building are assessed in turn in the following sections; as (i) Phase 1, (ii) Phase 1A, and then (iii) Phase 3 further refinements.

Legislation and Planning Policy Context

- 1.6 The requirement for a Heritage Statement report at application stage stems from the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires that special regard be paid to the desirability of preserving the special architectural or historic interest of a listed building or its setting. The Act also requires that the decision-maker pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 1.7 The National Planning Policy Framework (NPPF) 2023 provides the Government's national planning policy of the conservation of the historic environment. In respect of information requirements, it sets out that
- 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance ...'¹*
- 1.8 Paragraph 195 then sets out that local planning authorities should also 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.
- 1.9 Accordingly, the relevant heritage legislation, planning policy for guiding change within the historic environment is set out in full within our founding Baseline Heritage Appraisal report, which is included in full at **Appendix 1** for ease of reference.

Structure of this Report

- 1.10 To address the relevant legislative and policy requirements, **Section 2** of this report firstly identifies and confirms the heritage asset (or assets) within the Site or its vicinity; the significance of which would likely be affected by the proposed scheme (and also each of its key elements). This section establishes a description of the built heritage baseline conditions for the Site and these proposals. For this scheme and its likely impacts the focus should be our statement of heritage significance for the identified listed building on Site, as recommended by national best practice guidance.
- 1.11 As further background, Turley Heritage were first instructed in 2021 to provide our Client (and their design team) with both advice in relation to their emerging proposals for the future of the Heals Building. This was based in part on our previous experience working with this listed building, and also our extensive experience managing change for heritage buildings and areas within the LBC local planning authority area. The first step for our team has been to undertake targeted research and also on-site survey and analysis in order to better understand the historical development of this complex, and also its distinctive architectural character as a multi-phase collection of different built elements. This is the basis upon which a statement of heritage significance has been

¹ MHCLG, National Planning Policy Framework (NPPF) 2023 – para. 194

drafted for the listed building, which is contained within our first stage Baseline Heritage Appraisal report (dated December 2021 and also further updated in 2023). This baseline understanding has been, and will continue to be, used actively to further inform and also guide the design process for the optimisation of the use and sensitive adaptation of this historic building.

- 1.12 **Section 2** of this report draws directly from our founding Baseline Heritage Appraisal report, which is included in full at **Appendix 1** for ease of reference and completeness. It is on this basis that the potential impacts of the proposed scheme of works have been assessed. For ease of use we have focussed in on each of the different areas of these proposals as they relate to each of the key elements of the refined scheme in turn (i.e. (i) Phase 1, (ii) Phase 1A, and (iii) Phase 3).
- 1.13 **Section 3** then provides our description of the likely heritage impacts of the proposed scheme on the significance of the listed building, and also the surrounding conservation area. Again, this part of our assessment is divided into three parts as relates to each of the key elements (or phases) of the refined scheme in turn. Towards the end of this section these impacts are then also assessed overall in light of the relevant statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy contained within the NPPF 2023 and supported by the NPPG, and local planning policy (the Development Plan) for change within the historic environment.
- 1.14 Finally, our summary and conclusions in relation to our heritage impact assessment for the refined scheme are set out in **Section 4** of this report.

2. Heritage Assets and Significance

Heritage Assets

- 2.1 The National Planning Policy Framework (NPPF) 2023 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing)”.*²

Designated Heritage Assets

- 2.2 Designated heritage assets are those which possess a level of heritage interest that justifies designation under relevant legislation and are then subject to particular procedures in planning decisions that involve them. This includes statutory listed buildings.

Listed Building

- 2.3 The Site is located within the Heal and Son Ltd building which was listed Grade II* in 1974 and also for group value. The formal List Entry is included in full as part of our appended Baseline Heritage Appraisal report. It is the view of the local planning authority that proposed change as a result of this application scheme on Site would likely have a direct impact on the significance of this listed building, which is both a legislative and also a material planning consideration.

Conservation Area

- 2.4 The site is located within the Bloomsbury Conservation Area, which was first designated in 1968 by the London Borough of Camden with the aim of preserving elements of the prevailing Georgian townscape. Subsequent boundary alterations have sought to incorporate the Victorian, Edwardian and 20th century architecture also present in the enlarged conservation area. Proposed change to the exterior of the listed building would also have an impact on the significance – character and appearance - of the surrounding conservation area, which is again both a legislative and material planning consideration.

Heritage Significance

- 2.5 The NPPF also defines the significance of a heritage asset as:

*“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”*³

- 2.6 Historic England has published guidance with regard to the preparation of statements of heritage significance, and how the proper analysis of the significance of heritage

² MHCLG, National Planning Policy Framework (NPPF) 2023 – Annex 2: Glossary

³ MHCLG, National Planning Policy Framework (NPPF) 2023 – Annex 2: Glossary

assets should be used to inform an assessment of impacts on that significance as a result of proposed change.⁴

- 2.7 Historic England has also in the past provided further guidance for their staff (and others) on their approach to making decisions and offering guidance about all aspects of England's historic environment⁵. This provides advice on how to assess the contribution of elements of a heritage asset, or within its setting, to its significance in terms of its "heritage values". These include: evidential, historical, aesthetic and communal. This supplements the established definitions of heritage significance and interests set out in founding legislation and more recent national planning policy and guidance.

Designated Heritage Assets

Listed Buildings

- 2.8 Listed buildings are defined as designated heritage assets that hold architectural or historic interest. The principles of selection for listed buildings are published by the Department of Culture, Media and Sport⁶ and supported by Historic England's Listing Selection Guides for each building type⁷.

Conservation Areas

- 2.9 Conservation areas are designated by virtue of their special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Guidance has been published in respect of conservation areas by Historic England, and this provides a framework for the appraisal and assessment of the special interest and significance of a conservation area.⁸

Statement of Heritage Significance

- 2.10 **Appendix 1** to this report is our full founding Baseline Heritage Appraisal report. This includes a description of the historical development of the Site to establish context, and also a more focussed statement of heritage significance for each of the identified and relevant heritage assets to the Site and its future use / development. This analysis has been undertaken on the basis of review of existing published information, focussed desktop and archival research, and our own on-site visual survey and analysis.
- 2.11 This baseline analysis includes a statement of heritage significance for the Grade II* listed building (Heals Building) on Site. This is proportionate to the importance of the relevant heritage asset, and also provide a sufficient level of description to understand its relative significance, sensitivity and heritage interests; as a whole and also as part of a complex multi-phase collection of built elements, and in light of future envisioned change for the Site.
- 2.12 This full statement of heritage significance for the listed building is not repeated in this report, but summarised below. It is on this basis that the potential impacts of the

⁴ Historic England: Advice Note 12: Statements of Heritage Significance 2019

⁵ English Heritage (now Historic England) Conservation Principles: Policies and Guidance 2008

⁶ DCMS. Principles of Selection for Designating Buildings, 2018

⁷ Historic England. Selection Guides 2011 (and updated)

⁸ Historic England, Advice Note 1, Conservation Area Designation, Appraisal and Management. 2019 (2nd Ed.)

refined scheme of works have been assessed. We focus in on each of the different areas of these proposals as they relate to each of the key elements of this scheme in turn (i.e. (i) Phase 1, (ii) Phase 1A, and (iii) Phase 3).

Heals Building (Listed Building: Grade II*)

- 2.13 Externally it is considered that the distinctive form of Tottenham Court Road elevation from 1916, designed by Smith & Brewer, is the chief expression of the listed building's heritage interest, and here later alterations appear to be limited. The respectful and contextual addition in the 1960's to the north is also a key feature to this elevation. Furthermore the 1936-1973 extension by Edward Maufe is also of particular significance, particularly to the southern elevation of the building were the so-called Art Deco stair is articulated. Our further analysis of this designated heritage asset has identified that, notwithstanding the exterior, its significance is also derived from key elements of its historic plan form and quality internal fabric and features. These help to illustrate its former use and also complexity of functions across the site.
- 2.14 The areas or elements of greater heritage significance are those more public retail areas (at ground floor level and also towards the Tottenham Court Road frontage) related to the Heals store as part of its early 20th century and inter-war phases. Of particular interest internally are the part original spiral staircase deeper within the plan of the early 20th century building, and also the 1930s stair and lift core to the south west corner of the block. The basement and other upper storey levels within the main store (and also the 1960s extension) are as a general rule of lesser heritage interest by comparison with the main retail space at ground floor and the key circulation areas.
- 2.15 To the rear and within the depth of the Site (and also at the end of Alfred Mews), remnants of the earlier phase 19th century store and its workshops / factory (and also intervening yards) are legible alongside the later redevelopments. These elements also hold a moderate degree of heritage interest, but are otherwise more utilitarian in character and or have experienced a greater degree of alteration from that historic.
- 2.16 Across the entire Site there is clear evidence of more modern interventions as each of the different internal spaces have been variously adapted and successively refurbished for changing uses and also new tenant occupiers. Existing modern introductions such as office partitioning, kitchen and bathroom facilities, flooring and services are of no special interest.

Bloomsbury Conservation Area

- 2.17 Overall, the significance of the Bloomsbury Conservation Area is as a large townscape area comprising a series of planned elements of formal townscape as the city of London expanded northwards during the 17th and 18th centuries, and later redevelopments of the 19th to 21st centuries. It is principally characterised by a sequence of planned residential streets and garden squares enclosed by terraced buildings laid out in a hierarchal fashion extending out of the main arterial routes. Bloomsbury has also continually adapted to accommodate different uses over time, and also includes a number of larger scale townscape elements primarily associated with major educational or cultural institutions such as the British Museum and University of London. The conservation area has historical interest in illustrating the expansion, population growth and prosperity of this part of London from the 17th

century, and also how its use and character has continued evolved up to the present day. It also has architectural interest in illustrating past approaches to planning, architectural design, style and use of materials across this period, which has resulted in a rich and diverse townscape of buildings and space with a distinctive sense of place.

- 2.18 It is our assessment that it is the principal street frontage along Tottenham Court Road that makes by far the greatest contribution to the character and appearance of the surrounding conservation area, relative to other (external) elements of this building on site. It is in this element that architectural quality and style was invested by its builder / designer; also reflecting the importance of this street and its commercial origins. It is within key views north and south along Tottenham Court Road that the historical and architectural relationship of this building within its urban block and the larger 19th century townscape scheme here can also be appreciated.

Key Elements / Areas of the Refined Scheme

(i) Proposed DDA compliant platform lift from fifth to sixth floor level of the Heals Building complex (1930s extension), which comprises a refinement to previously approved refurbishment works as part of Phase 1

- 2.19 The area of the Site that is proposed to be altered as a result of this element of the refined scheme comprises a small area within the existing modern office space / servicing at both fifth and sixth floor levels towards the south west corner of the building. Study of historic maps and drawings of the larger Heals complex demonstrate that the existing office space at fifth floor level was constructed as part of the 1936 alterations to the building by Edward Maufe. This is illustrated as an open plan office space adjacent to the principal art deco staircase, in the 1937 drawing included below, which relates to a larger proposed extension and redevelopment scheme at that time (**Figure 2.1**). This office space has since been heavily altered, most recently as part of a previous comprehensive commercial-led refurbishment in the 2000s. As a result, the open plan form has been eroded with a number of partitions added to the space as well as utility/service areas including W.Cs.

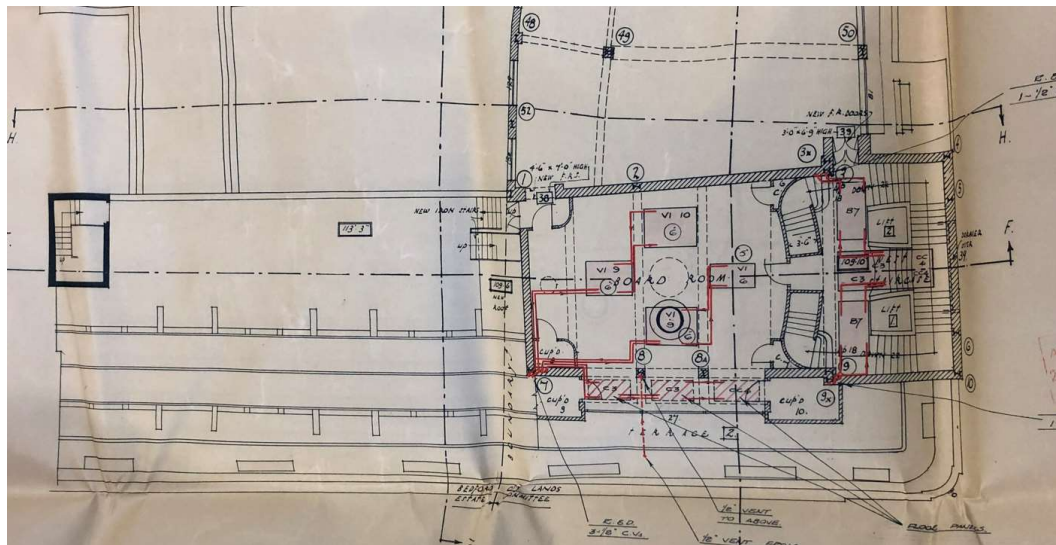


Figure 2.1: Extract of 1937 Proposed fifth floor (albeit part of larger proposed extension and redevelopment scheme)

2.20 At sixth floor level, study of historic maps and drawings of the larger Heals complex demonstrate that the existing office space was not constructed as part of the 1936 alterations to the building by Edward Maufe. This is illustrated as a largely open roof space, in the second 1937 drawing included below (**Figure 2.2**), which relates to a larger proposed extension and redevelopment scheme at that time.

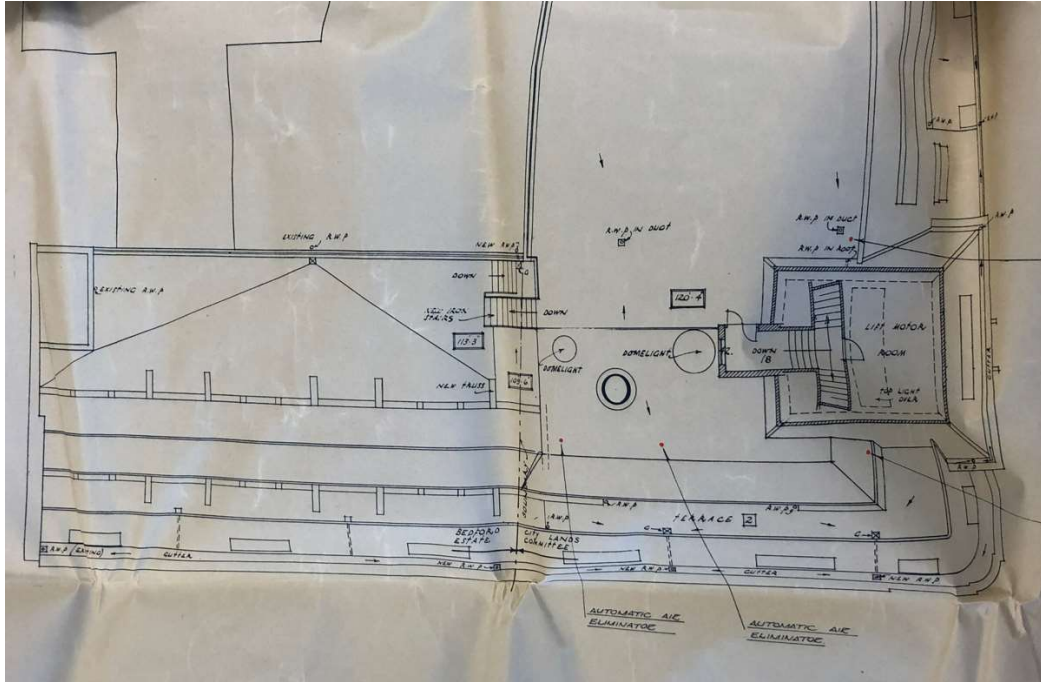


Figure 2.2: Extract of 1937 Proposed Roof Level (sixth floor) (albeit part of larger proposed extension and redevelopment scheme)⁹

- 2.21 A comparison with the existing layout of these internal spaces at fifth and sixth floor level to this corner of the 1930s extension to the original store can be gained through **Figures 2.3-2.4** further below. As a result, it is assumed that this area dates from potentially the extension works in the 1960s to the neighbouring Brook House as part of the works to the wider complex during this time. It is known that this area was refurbished in 1984 and was again refurbished as part of the works undertaken in 2013. The interior of the space is considered to be of little to no heritage interest as this area has been subject to a high degree of change both to the fabric and plan form.
- 2.22 Overall, this office space has been left largely un-touched since a previous comprehensive commercial-led refurbishment in the 2000s. It is our assessment therefore that the existing modernised fabric, features and character of the internal condition of these spaces are not elements that contribute to the understanding or appreciation of the significance of the listed building as a whole. The broader plan form and structure of these parts of the larger complex (particularly the 1936 staircases to either end), which would not be affected by this scheme, do otherwise contribute to that heritage significance.

⁹ City of London (London Metropolitan Archives)

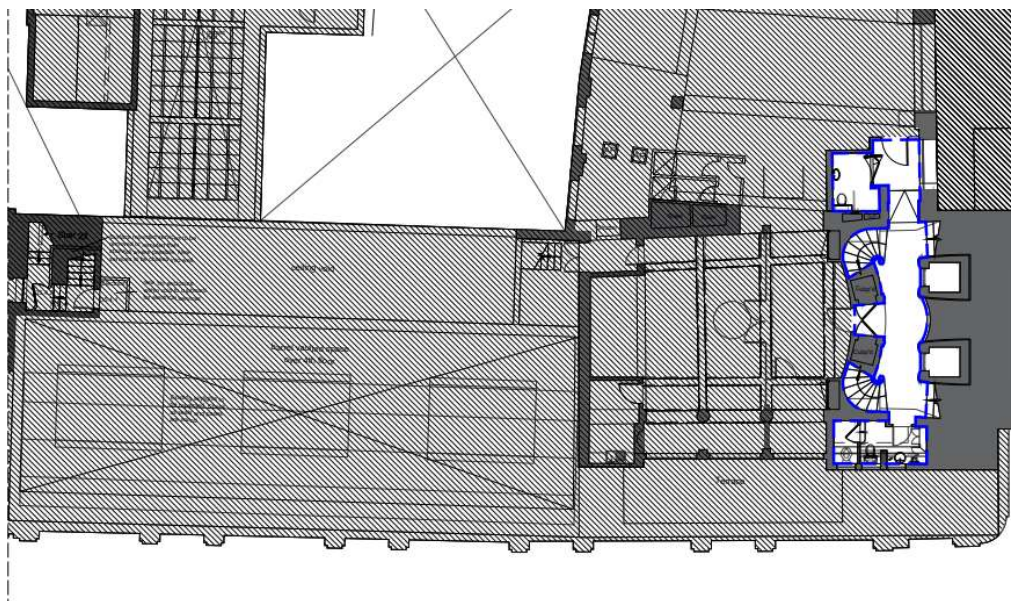


Figure 2.3: Fifth Floor level as existing survey

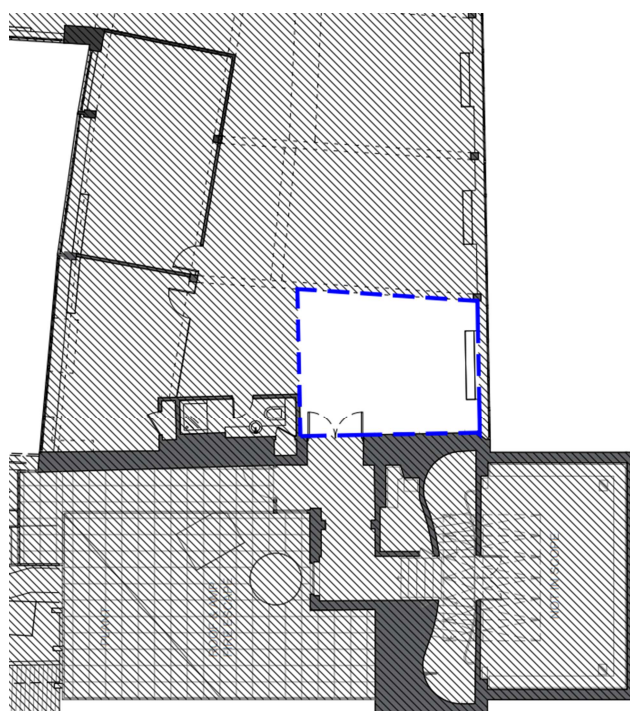


Figure 2.4: Sixth Floor Plan as existing survey

(ii) Proposed redesign of Torrington Place entrance to another 1930s element of the building complex (effectively as part of Phase 1A)

2.23 The area of the Site that is proposed to be altered as a result of this element (Phase 1A) of the wider refined scheme comprises the modern entrance frontage to the shared reception area for the larger building complex addressing Torrington Place. This part of the complex falls within the area of a later 1930s extension to the older established store, which was again designed by architects Smith and Brewer. This was purpose built as a new principal goods depot, warehouse and workshop accommodation for the

growing store. Its steel framed construction with reinforced concrete floors, and use of brickwork to the upper storeys, metal framed window and distinctive Moderne detailing such as the pair of curved bays to the frontage, are typical of the period and building type. On completion in 1936 this new building was featured as an article in the journal of The Architect & Building News, which includes a contemporary photograph of the street frontage and also partial floor plans (**Figures 2.5-2.6**).

- 2.24 This journal article clearly demonstrates the substantial degree of change that has occurred at street level across the frontage of this building from that original. The symmetrical arrangement of individual shops to each edge framing a central display window for the store and pair of archways to allow vehicles to access the centralised loading area behind is no longer legible in the street scene, and the original composition of quality materials and detailing to this frontage has been replaced with new. As found today, this building adjoins the more Modernist early 1960s extension to the store (including Brook House) along Tottenham Court Road and on the corner along Torrington Place that was designed by Fitzroy Robinson and Partners, and which replaced a number of earlier built elements within the site. These elements of the wider complex have both been further and variously adapted and altered to link internally.



Figure 2.5: Photograph of street frontage (Torrington Place) dated 1936

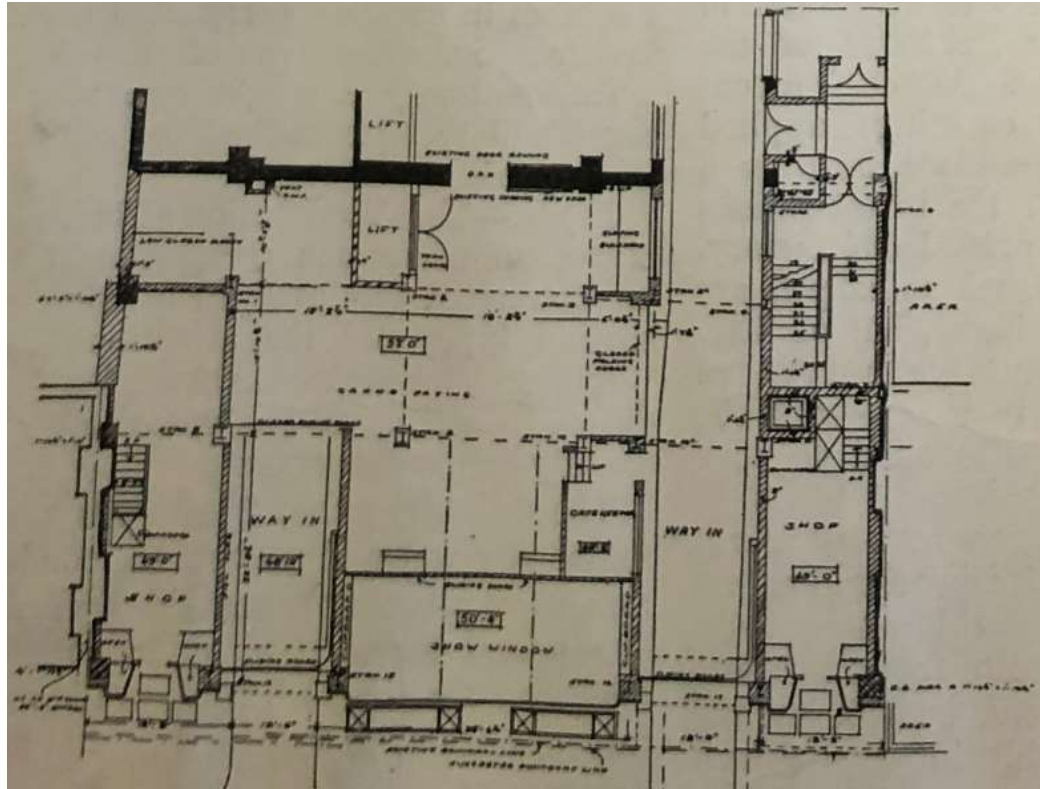


Figure 2.6: Extract of ground floor plan dated 1936¹⁰



Figure 2.7: Photographs of the street frontage dated 2011

- 2.25 Review of more recent planning history confirms that the external shopfront and canopy, and also the internal reception area behind, was extensively refurbished in 1998 and again in the 2010s. The internal reception and lobby area here leads deeper into the plan and to a central external courtyard space which was all redeveloped in the 2010s to create a shared circulation space and core for the whole complex, and which has also been refurbished most recently by the Applicant. Photographs of the

¹⁰ The Architect & Building News Journal, 21 August 1936 (p225) (Camden Archives)

exterior taken from the Design and Access Statement / Heritage Impact Assessment reports prepared to accompany the application for the 2010s scheme are included for reference at **Figure 2.7** above. These are dated 2011 and show the modern treatment of polished stone or ceramic cladding, frameless glazed doors and window, and a short metal canopy over the entrance (former vehicle archway in the 1930s). As found today, and with the implementation of consent for that scheme, we have renewed cladding in black panels and glass and a thicker and deeper canopy now extending across both bays of this part of the frontage.

- 2.26 Overall, the existing part of this street frontage of the building and also the reception area beyond represent a part of the listed building complex that has been very heavily altered from the original condition. The existing materials and design externally almost entirely dates from the 2010s, which are not elements that contribute to the understanding or appreciation of the significance of this listed building, or to the character or appearance of the surrounding conservation area.

(iii) Proposed new signage and lighting to Alfred Mews frontage (as part of Phase 3).

- 2.27 The area of the Site that is proposed to be changed as part of this element of the further refined scheme is located to the rear and within the south eastern corner of the ground floor level of the larger Heals Building complex (referred to as Phase 3 for the purposes of the overall scheme design). This area is characterised as a former industrial service and store area for the complex, elements of which dates from the later 19th century, the 1930s principally as this range addresses Alfred Mews on its north side, and also that have subsequently altered and upgraded throughout the key phases of its later adaptation and changing uses.
- 2.28 **Figure 2.8** is an extract from a simplified drawing plan of the Heals Building dating from 1938 (just after the first major extension of the earlier 20th century store), which shows the extent of the wider building complex at ground floor level. The original Phase 3 scheme essentially comprises works within the areas within the depth of the urban block that are denoted as E and F on this plan at ground floor level, and also include other associated commercial areas at basement and upper floor levels outside the tenancy of Heals themselves. These works are subject to applications for PP and LBC that are in the process of being determined or otherwise discharged by the local planning authority, but which are understood to be acceptable in principle in design and heritage terms.
- 2.29 This former industrial / service area of the building complex to the rear of the retail store area and towards the Alfred Mews frontage and yard retains some heritage interest through the legible inter-relationship between manufacture and design, which was a key part of the Heals operation. However, this interest has been diminished by more recent refurbishments. Furthermore, the interior spaces have a simple, utilitarian, character internally, which has largely been determined by more recent refurbishment of the office / service spaces with modern materials, fixtures and fittings within the somewhat retained historic plan form and structure at this level. This is an area of lesser heritage significance within the context of the listed building as a whole, and therefore also less sensitive to further change, and where it has been subject to a high degree of alteration in the past.

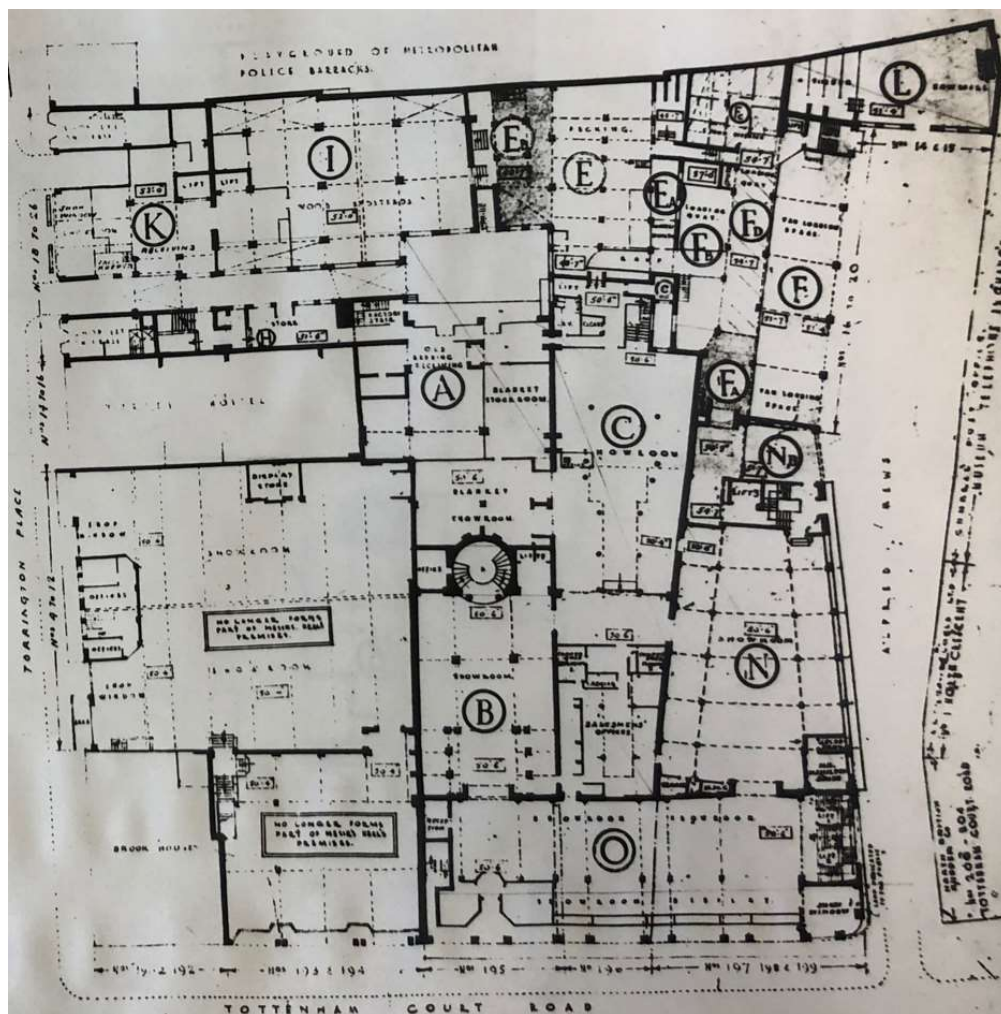


Figure 2.8: Extract of 1938 Ground Floor Plan¹¹

- 2.30 Externally, although the street level frontage of service bays to Alfred Mews has been compromised by more recent alterations, the upper levels of the elevation of this rear range retains much of its original interwar character. This is illustrated in the photograph at **Figure 2.9** further below that is understood to date from the interwar period.
- 2.31 Again, we have highlighted that our founding statement of heritage significance for the listed building provides a more detailed description of the complex multi-phase development of this collection of building elements over time. The relative contribution of the different elements and areas of this building to the heritage significance of the whole is most helpfully illustrated through a series of annotated floor plans, or “traffic light plans”, in light of the age, type, form and scale of this specific building. These annotated plans are included as part of our Statement of Heritage Significance, and also for ease of reference within **Appendix 1** to this new report.

¹¹ City of London (London Metropolitan Archives)



Figure 2.9: Photograph of Alfred Mews and rear range dating from 1930s¹²

¹² City of London (London Metropolitan Archives)

3. Refined Scheme and Likely Heritage Impacts

Introduction

- 3.1 In accordance with the requirements of the NPPF 2023, the likely affected designated heritage assets have been identified, and then their significance described in a proportionate manner, in the baseline section of this report **Section 2** (also including **Appendix 1**).
- 3.2 The relevant heritage legislation, planning policy and guidance has been set out in full as part of the baseline condition (again at Appendix 1). This includes the following:
- Legislation set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, and relevant statutory duties;
 - National policy set out in the NPPF, as supported by NPPG; and
 - Local policy and guidance for change within the historic environment and other relevant material considerations (including the local Development Plan).
- 3.3 Together, these sections and appendices provide an appropriate basis upon which to assess the likely impacts of the application proposals for these latest scheme refinements on Site by the local planning authority.

Proposed Works / Development

Pre-Application Engagement

- 3.4 This proposed further scheme of works forms part of a wider vision and strategy by the Applicant to sensitively reinvigorate the use and appearance of this unique collection of built elements that are focussed around the historic Heals store through a phased approach. Accordingly, there has been a much earlier process of pre-application engagement with officers at the local planning authority, and also Historic England (HE), which first introduced and then launched this vision.
- 3.5 This refined scheme has then been informed by more recent and constructive pre-application engagement with officers at the local planning authority (London Borough of Camden or LBC). This process has included two meetings with officers, held in June and July 2023, and also written feedback provided via email on 13 July 2023. The response of the final application scheme to this latest feedback is further detailed in our assessment in this section below.

Refined Scheme

- 3.6 The scheme proposals for discussion with officers at pre-application stage are described in full through the submitted design material prepared by the architects White Red in conjunction with Buckley Gray Yeoman, including proposed annotated drawings and visualisations and also their draft Design and Access Statement (DAS). A structural report by an appointed specialist has also been commissioned and can be provided as relevant to this scheme. In summary, the further proposed works of alteration / extension to the listed building can be described as:

- (i) Proposed DDA compliant platform lift from fifth to sixth floor level of the Heals Building complex (1930s extension), which comprises a refinement to previously approved refurbishment works as part of Phase 1;
- (ii) Proposed redesign of Torrington Place entrance to another later 1930s element of the building complex (effectively as part of Phase 1A); and
- (iii) Proposed new signage and lighting to Alfred Mews frontage (as part of Phase 3).

3.7 This refined scheme of works forms part of the earlier established wider vision and strategy for the wider historic building complex at Heals. The strategy for implementation has been approached in a number of discreet phases for the purposes of design work and also subsequently the series of application submissions for PP and or LBC. For the purposes of this report and application submission each of the key elements of these proposals for further change to the listed building are assessment in turn in the following sub-sections; as (i) Phase 1, (ii) Phase 1A, and (iii) Phase 3 refinements.

Impact Assessment

(i) Proposed DDA compliant platform lift from fifth to sixth floor level of the Heals Building complex (1930s extension), which comprises a refinement to previously approved refurbishment works as part of Phase 1

- 3.8 Feedback received from officers as part of most recent pre-application engagement set out that the proposed lift connecting these floor levels within the 1930s part of the listed building would be supported in principle, and also improved accessibility of the building encouraged. However, it was a recommendation that full structural engineering evidence should be submitted as part of any future application to demonstrate effects on the fabric of the building. Accordingly, a structural statement has been prepared for this element of the works by professional engineers experienced with historic buildings and submitted at application.
- 3.9 Our baseline appraisal of the significance of the listed building has established that the existing largely modernised fabric, features and character of the internal condition of the existing office spaces are not elements that contribute to that significance. Importantly, the exterior and also the broader plan form of these areas within the larger building complex would be retained and not otherwise affected by this proposed DDA platform lift. Overall, this alteration is considered to be minor in terms of the scale, complexity and also varying heritage interests of this building.
- 3.10 This supporting design material describes how this carefully considered DDA platform lift will provide access for any and all users of the building to the sixth floor level, which is currently only accessible via two stair cores. This is a public benefit in planning terms, and we are pleased to be able to achieve this improvement to the accessibility and inclusivity of the building whilst avoiding any significant adverse impacts on the historic fabric, features or significance of the listed building.
- 3.11 Drawings illustrate the removal and replacement of the existing DDA WC and other existing WCs at fifth floor level, which are existing internal elements of no heritage

interest, in order to provide access for the new platform lift. In addition, a small portion of the existing slab between the fifth and sixth storey will be removed to insert the DDA platform lift. The proposed location is within this secondary area within the building and has been identified as having lower significance, however, it is recorded on plans dating from 1937 and is thus considered to form part of the historic fabric of this phase of the building. It is considered that the impact that the removal of a small portion of the existing slab would have on the heritage significance and interest of this building as a whole will be very limited.

- 3.12 In any case, any potentially perceived harm to heritage significance would in our view be balanced against the public benefit of providing full access to the sixth floor which is currently inaccessible for all users. It is our assessment that when considered overall these proposals would sustain the heritage significance of the listed building.

(ii) Proposed redesign of Torrington Place entrance to another later 1930s element of the building complex (effectively as part of Phase 1A)

- 3.13 Feedback received from officers as part of the latest pre-application engagement set out that the proposal for a new entrance to the building along Torrington Place, including the replacement canopy and lighting, would be acceptable in principle. However, it was recommended that the lighting should be soft with low levels of luminance so as not to cause undue light pollution within the context of the surrounding conservation area. Accordingly, further design and technical specification in relation to any change to the existing light to this frontage forms part of the application submission.
- 3.14 Regarding the design of the entrance doors and surrounds, officers also recommended that the design to be informed by that historic (where known), which was understood from archival sources to have included sizeable sheets of glazing within vertical mullions. They therefore encouraged the use of horizontal transoms to be kept to a minimum. The use of colour and finish that matches that currently proposed as part of the refurbishment of the Alfred Mews frontage as part of Phase 3 (at application determination) was also encouraged; as would provide design consistency across the Site. Accordingly, the DAS clearly describes the team's design process and how these recommendations have been incorporated into the final application.
- 3.15 Our baseline appraisal has established that the material and design of the existing street frontage of this part of the listed building to Torrington Place is very recent in date; essentially part of the 2010s comprehensive refurbishment of what was originally a Moderne style 1930s extension to the older store building to provide for new workshops, warehousing and service yard behind shopfrontages. The reception space internally is similarly recent in date and of no heritage interest. Overall these are not elements that contribute to the heritage significance of the listed building.
- 3.16 Again, the DAS describes through both words and images the final design approach proposed for the Torrington Place entrance, which would continue to be one of the key access points for the multiple commercial tenants across the larger building complex (not just to serve the Heals store). The removal and replacement of the existing external cladding materials, including canopy, would not effect any historic fabric or features of significance. The existing two bay structural opening would be retained.

These proposals then take the opportunity to create a more legible, welcoming and attractive entrance experience, and new high quality design. The transparency of the frontage would be retained and also the shelter provided by the canopy retained as part of this scheme.

- 3.17 There is an historic connection to be made between the 1930s date and Moderne style of this building on Torrington Place and the contemporary industrial range also built for Heals towards Alfred Mews, which also shares a similar palette of materials in brickwork, concrete banding and metal framed windows. Accordingly, a similar design approach has been taken for the materiality of this entrance that reflects that already proposed at application (and also endorsed by officers) as part of Phase 3. New metal framed glazing (doors and windows) to each bay are proposed in a Crittall-like style and bronze effect. However, a different approach has been taken for the configuration and proportions of the glazing pattern to Torrington Place. Here a simpler and more vertically proportioned design is proposed, which limits the number of dividing elements, and also better reflects the original character of extensive areas of shop glass to the street.



Figure 3.1: Rendered CGI of proposed Torrington Place entrance (WR Architects)

- 3.18 The central and also framing piers to each bay will be clad in contrasting black tiles in order to provide a visually ground base for the building, and also in some way reflect the presumed historic colour treatment of the frontage at this level. Above the entrance a single rectangular projecting canopy will again provide shelter, which will also be manufactured in metal with a bronze finish. The canopy will be a lightbox to illuminate the entrance area, would allow for the incorporation of signage, and also would support wayfinding within local streetscene views. The fascia band above would be faced in concrete or pre-cast stone to reflect the existing concrete floor band above and also the original treatment for the service bays at Alfred Mews. The quality of the

new design would be further lifted by the replacement of existing external tarmac material to the main entrance doors with new stone paving.

- 3.19 Overall, these proposals to redesign the Torrington Place entrance would only effect modern fabric or features, and would have no harmful effect on the heritage interest of the listed building. The quality of this design and use of materials and detailing would represent a significant improvement to the existing condition, and which would also respond positively to the history and architectural character of the host 1930s Moderne building as well as the wider Heals Building complex. In this way this scheme would not only sustain but also to a degree enhance the heritage significance of the listed building and also its contribution to the surrounding conservation area.

(iii) Proposed new signage and lighting to Alfred Mews frontage (as part of Phase 3)

- 3.20 Feedback received from officers as part of the latest pre-application engagement set out that the principle of the proposed new signage would be acceptable, subject to further details on materiality and the likely physical impacts on the fabric of the building. Accordingly, further design and technical specification forms part of the application submission, and or could be provided as part of the discharge of any conditions to approval if required. Officers were satisfied that the proposed fascia signage would be at an appropriate scale and size for this elevation. Both proposed swan-neck lights and projecting hanging signs were accepted, albeit ensuring a height of 2.3m and appropriate distance away from the highway for vehicular safety reasons. Again, further detailed information on these elements (and also light levels) have been provided at application stage.
- 3.21 The relevant part of the DAS describes the design approach for the signage and lighting of the Alfred Mews frontage, which is an important part of wider proposals (Phase 3) for the reuse and reactivation of this elevation and also rear part (and upper floor levels) of the building internally for its existing and also prospective new tenants. These proposals complement an established scheme to improve the function and appearance of this street frontage through the removal of unattractive modern roller shutters, revealing existing brick piers, and introducing a new metal glazing system of high quality reflective of the Art Deco heritage of the host building. This would again create a more legible, welcoming and attractive entrance experience.
- 3.22 Six swan-neck light fittings are proposed to be installed at fascia level to this elevation, and would be spaced evenly along the frontage. The design of these new installations would follow that historic as evidenced through archival sources, and would be coloured in a bronze effect to reflect the materiality of both the proposed signage lettering and also the improved glazing pattern to the entrance below. These would be complemented by a pair of traditionally designed hanging signs also at fascia level, framing the new main entrance. This approach would again reflect historic precedent, such as the known existence of such signage to the main Tottenham Court Road elevation. Discreet fixings would be used for both these installations, and have very minimal impact on existing fabric. The final elements of these proposals would be the painting of the word "Heal's" on new bronze effect roller shutters.

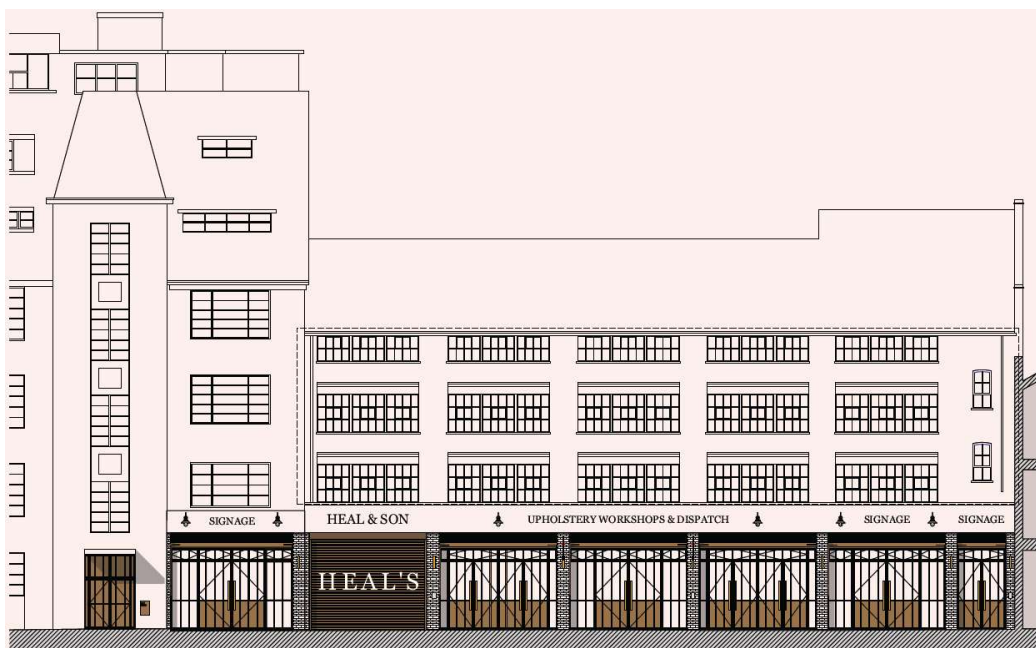


Figure 3.2: Drawing of Proposed Alfred Mews Elevation (BGY Architects)

- 3.23 Overall, these further refinements to the proposed redesign and improvement of the Alfred Mews frontage / entrance would have no harmful effect on the historic fabric or features of the host building. The quality of this historically-inspired design and appropriate use of materials and detailing would not only sustain but also to a degree enhance the heritage significance of the listed building and also its contribution to the surrounding conservation area.

Compliance with relevant Legislation and Planning Policy

Statutory Duty - The Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.24 It is demonstrated within this section of the report that each of the proposals that form part of this further refined scheme would accord with the requirements of the relevant statutory duties of the 1990 Act. This scheme would preserve the special interest (and setting) of the listed building on Site, and would also preserve and or enhance the character and or appearance of the surrounding conservation area.

National Policy - NPPF 2023 and NPPG

- 3.25 In accordance with the requirements of paragraphs 194-195 of the NPPF, the significance of the identified relevant designated heritage assets have been described proportionately in **Section 2** and **Appendix 1** (i.e. our Heritage Baseline Appraisal) of this report. This provides an appropriate analysis of the baseline conditions of the Site in relation to built heritage matters.
- 3.26 In accordance with Paragraph 197 of the NPPF, account has been taken through the development of this further refined scheme of the desirability of sustaining and enhancing the significance of the affected heritage assets; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and also the desirability of new development making a positive contribution to local character and distinctiveness. The scheme would achieve this by

enhancing the appreciation and understanding of the listed building through these well-considered refurbishment works, and also the associated optimising of the viable commercial use and vitality of the wider complex for the iconic Heals brand.

- 3.27 In accordance with Paragraph 199, great weight has been given to the assets' conservation. Importantly, Annex 2 of the NPPF defines 'conservation' as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. It is not a process that should prevent change, where proposals such as this scheme will have been designed to a high standard, respect heritage significance, and would overall avoid harm. It is our assessment that both the designated heritage assets would be conserved and their significance either sustained or enhanced as a result of the further works proposed.

Development Plan

London Plan 2021

- 3.28 The proposed refined scheme would accord with Policy HC1 of the London Plan, which requires development affecting heritage assets to conserve their significance, by being sympathetic to that significance and also their settings. This is again in accordance with overarching national legislation and planning policy with regard to built heritage assets (as set out earlier in this section above).

Camden Local Plan 2017

- 3.29 In accordance with Policy D2 (Heritage), these proposals will conserve the designated heritage asset of the listed building on Site, and sustain, or to a degree enhance, its significance. Any harm to heritage significance would be avoided. This scheme would also preserve and or enhance the character and or appearance of the surrounding conservation area.

4. Summary and Conclusions

- 4.1 In summary, the relevant built heritage considerations for these further refinements to the comprehensive scheme of refurbishment are potential direct impacts on the significance of the designated heritage assets of the listed building Heals Building (Grade II*) as well as the surrounding Bloomsbury Conservation Area. A proportionate description of the baseline conditions in relation to these identified heritage assets has been undertaken, including a description of their heritage significance and also any contribution made by the area of proposed change within the Site to that significance. This work has been undertaken in accordance with best practice guidance and advice as established by DCMS and Historic England and meets the requirements of paragraphs 194-195 of the NPPF 2023.
- 4.2 As part of further refinements to Phase 1 of the larger scheme for this Site, it is proposed to install a new DDA lift between fifth and sixth floors to ensure any and all users of the building will be able to access these levels inclusively. This upper level is only currently accessible via two stair cores. This is a public benefit in overall planning terms, which would in balance have minimal impact on the historic fabric, features or significance of the listed building.
- 4.3 As part of Phase 1A, proposals to redesign the essentially modern Torrington Place entrance to a high quality and use of materials and detailing would represent a significant improvement, which would also respond positively to the history and architectural character of the host 1930s Moderne building as well as the wider Heals Building complex. This change would represent an enhancement to the heritage significance of the listed building and also its contribution to the surrounding conservation area.
- 4.4 For Phase 3, proposals to complement established proposals to redesign and improve the function and appearance of the Alfred Mews frontage to a high quality and use of materials would again represent a benefit. Proposed new lighting and signage again reflects the history and character of this historic building. Overall these further refinements to the scheme across Phases 1, 1A and 3 would all support the further roll out of the Applicant's envisioned high quality refurbishment that would help to optimise the viable commercial use, vitality and appearance of this historic complex.
- 4.5 In conclusion, these proposals for a further refined scheme would each address the relevant statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990 for listed buildings and conservation areas, national policy set out in the NPPF 2023 (paragraphs 197, 199) and supported by NPPG, and also the local Development Plan, including the Mayor's London Plan 2021 (policy HC1) and Camden Local Plan 2017 (policy D2), with respect to change within the historic environment.

Appendix 1: Baseline Heritage Appraisal

Turley Office
12 Brownlow Mews
Roger St
London
WC1N 2JU

T 020 7851 4010