

Heritage Statement

6th Floor Roof Terrace

Heals Building, 196 Tottenham Court Road,
W1T 7LQ

June 2024

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1. Introduction

Purpose of this Report

- 1.1 This Heritage Statement report has been prepared by Turley Heritage at application stage 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 / extension to the Grade II* listed Heals Building complex, 196 Tottenham Court Road (the 'Site'). This report supports tandem applications for both Planning Permission (PP) and or Listed Building Consent (LBC) for development / works comprising the creation of an accessible roof terrace at sixth floor level of the Heals Building complex (1930s extension), which also forms part of a wider scheme of previously approved refurbishment works for this building and would be a valued amenity for the users.
- 1.2 This report should be read in conjunction with the full application submission design material for this scheme, as prepared by the architects White Red (in conjunction with Buckley Gray Yeoman), including proposed architectural drawings and illustrations / visualisations and also their Design and Access Statement (DAS). It is also noted that this scheme has been informed by an extended and constructive process of pre-application engagement with officers at the local planning authority the London Borough of Camden (LBC).
- 1.3 As highlighted above, 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. 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. 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.

Legislation and Planning Policy Context

- 1.4 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.
- 1.5 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

- 1.6 Paragraph 201 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.
- 1.7 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 (Updated 2023), which is included in full at **Appendix 1** for ease of reference.

Structure of this Report

Baseline Conditions

- 1.8 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.
- 1.9 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 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.
- 1.10 **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 on the particular area of these latest proposals.

¹ MHCLG, National Planning Policy Framework (NPPF) 2023 – para. 200

Assessment of Likely Impacts

1.11 **Section 3** then provides our description of the likely heritage impacts of the proposed scheme on the significance of the listed building. 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.

2. Heritage Asset and Significance

Heritage Asset

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.

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

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

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

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

- 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.
- 2.11 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.
- 2.12 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.
- 2.13 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 application scheme of works have been assessed.

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.)

Heals Building (Listed Building: Grade II*)

- 2.14 Our detailed analysis of the designated heritage asset of this listed building 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.
- 2.15 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.
- 2.16 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.
- 2.17 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.

Sixth floor Roof Area

- 2.18 The area of the Site that is proposed to be altered as a result of this application scheme is comprised of a small area of roof/plant space at sixth floor level.
- 2.19 At sixth floor level, study of historic maps and drawings of the larger Heals complex demonstrate that the existing roof space was constructed as part of the 1936 alterations to the building by Edward Maufe. This is illustrated as a largely open roof space, which relates to a larger proposed extension and redevelopment scheme at that time (**Figure 2.1**). When comparing this drawing with aerial images of the roof level from the mid-20th century and today it is evident that the only features which have been retained is the internal access area and the dome light closest to this access point (**Figures 2.2 and 2.3**). As a result, it is considered that this roof space has been heavily altered and modernised, including the loss of the smaller dome light to the north and the introduction of modern plant.
- 2.20 It is known that the wider roof area was renovated in 1984 and was again as part of the works undertaken in 2013 in order to update the services for the building, predominantly providing modern plant structures. Where historic features have been retained, only the dome light, there is a degree of heritage significance in this original 1936 feature, however the roof space more widely is considered to be of little to no heritage interest as this area has been subject to a high degree of change.

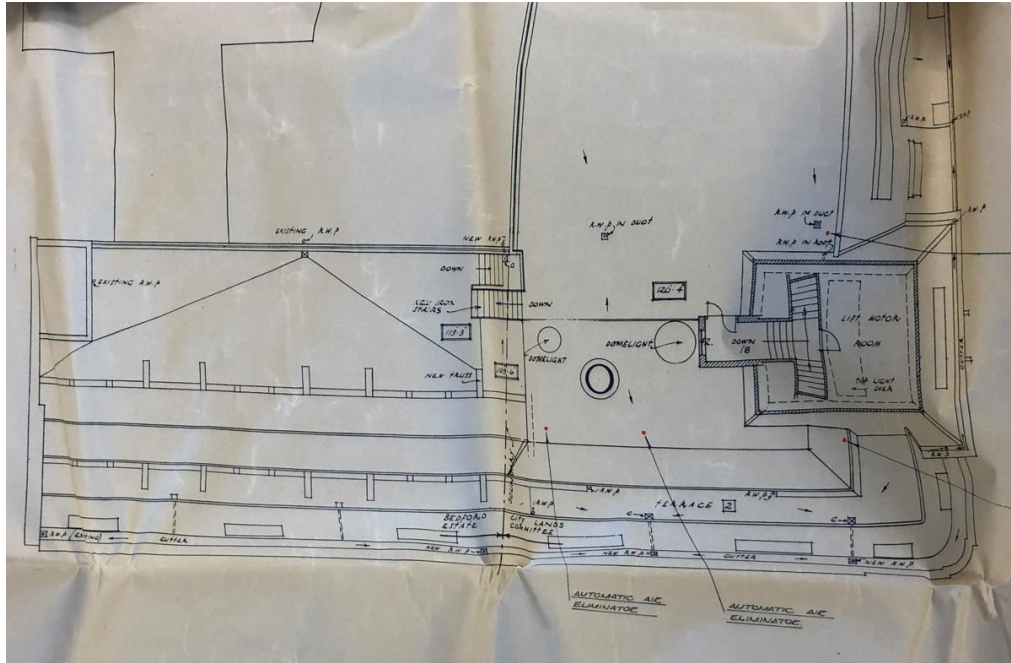


Figure 2.1: Extract of 1937 Proposed Roof Level (sixth floor) (albeit part of larger proposed extension and redevelopment scheme)⁹



Figure 2.2: Roof of Heals Building in 1946 demonstrating (image provided by Britain from Above)

⁹ City of London (London Metropolitan Archives)



Figure 2.3: Roof of Heals building today (image provided by google maps)

- 2.21 It is our assessment therefore that the existing modernised fabric, features and character of the external condition of this roof space is not an element that contributes to the understanding or appreciation of the significance of the listed building as a whole. The broader plan form and structure of this floor level and 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.

Bloomsbury Conservation Area

- 2.22 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.
- 2.23 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.
- 2.24 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.

- 2.25 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. It should also be mentioned that the roofscape of the conservation area including at the site is considered to be varied.

Application Site

- 2.26 As previously noted, the area of the Site that is proposed to be changed as part of this application scheme is the plant/roof area at sixth floor level behind the existing parapet along the Tottenham Court Road. Externally it is considered that the distinctive form of Tottenham Court Road elevation from 1916, designed by Smith & Brewer, is the chief expression of 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 great significance particularly to the southern elevation of the building where the art deco stair is articulated. However, as noted above the existing space at roof level which originally forms a small part of the 1936-1937 extension, has been heavily altered over the years and now serves as a fire escape, with an area of disused space and plant. Overall, this minor element of the Heal's complex, as part of the wider view of the principal elevation along Tottenham Court Road, makes a far lesser contribution to the significance – character and appearance – of the conservation area, relative to the 1916 façade, which has been little altered, or the 1960's facade; and as a small element within the context of this large and diverse conservation area as a whole.

3. Application Scheme and Heritage Impacts

Application Scheme

- 3.1 The scheme proposals are described in full through the design material prepared by the appointed architects White Red, including proposed drawings / illustrations and their Design and Access Statement (DAS).
- 3.2 The DAS supports our own assessment of the heritage impacts of this scheme in describing how this carefully considered roof terrace will ensure that there will be minimal intervention with the existing fabric of the building as the existing access door to the plant area and the skylight to the floor level below will be maintained. And also that the visual or experiential effects from street level within the surrounding townscape minimised as far as possible. The proposed use of this space as a roof terrace would enhance the user experience of the building by providing an additional amenity and break-out for the office workers, thereby improving well-being and social interactions. This considered approach and design will also ensure that the remaining fabric and or features that contribute to the significance of the listed building, and its role in the surrounding conservation area, will be sustained.

Impact Assessment

Roof Terrace at 6th Floor Level

- 3.3 Our baseline appraisal of the heritage significance of the listed building has established that the existing largely modernised fabric, features and character of the external condition of the roof space are not elements that contribute to that significance. Importantly, the remaining features from the 1936-37 phase of the complex, solely the dome light, would be retained and not otherwise affected by this proposed roof terrace adaptation. Overall, this alteration is considered to be very minor in terms of the scale, complexity and also varying heritage interests of this large and prominent building and urban block.
- 3.4 Accordingly, the application DAS and architectural drawings prepared by the scheme architects describe in detail the proposed works in terms of the retention, removal and or replacement of external elements within the modernised area at roof level. The purpose of these works is to enhance the user experience and provide a breakout space for office works to improve wellbeing and social interaction. This is in support of the ongoing viable and vibrant use of the larger listed building complex (within this conservation area) by its commercial tenants.
- 3.5 This scheme forms the next and one the last phases of the Applicant's proposals for this building, and as part of a wider and more ambitious vision for the future use and revitalisation of the Site focussed on the landmark Heals store. Agreement has already been secured with the local planning authority to undertake a light-touch refurbishment and soft strip out of the once vacant office accommodation across the upper floors (levels 3-5) of the larger building. This next stage of the broader fit-out is a critical part of enabling the building to become fully occupied. With regards to the roof

terrace proposals; this is related particularly to the high expectations of tenants in terms of office working environment and amenity.

- 3.6 In direct response to feedback from officers at pre-application stage¹⁰, the Applicant and their design team undertook a wider study of the roof area of the whole Heals complex and urban block. This is described and illustrated in the DAS accordingly. This revealed the existing small but accessible flat roof area to this part of the Site to be the only practically viable space for the delivery of an external amenity terrace for the building users. The existing access door will be reused for this new terrace.
- 3.7 The proposals here include the removal and replacement of unsympathetic existing metal guardrails with planters with integrated seating, screening to hide the existing plant equipment, and a raised composite deck to provide level access and the retention of the existing fire escape route and skylight to office floor below. The existing taller rear wall to this space within the depth of the plan would also be repaired and repainted as an improvement. The DAS further described the intention to deliver architectural design of the highest quality in detail and materiality; commensurate with that already approved and or now implemented across the Heals complex to that high standard of finish. These works would not impact upon the historic fabric or plan form of the building at this level and would be an improvement over the existing disused space. In this way these proposals would sustain the heritage significance of the listed building, and also avoid impact on the character of the surrounding conservation area.
- 3.8 Importantly, the design of the new roof terrace has been revised since pre-application stage, directly in response to feedback from officers during that process. The amenity area itself is now set back further from the street frontage edge into the depth of the building plan in order to reduce the visibility of users from street level below as far as possible, whilst retaining a meaningful amenity. Previously proposed pergola-like structures and railings have all been removed from the revised scheme, in order to further limit visibility and intervention. The new terrace would sit very comfortably and discreetly in this area and well below the height of the original corner pavilion and more modern roofline behind. Overall these proposals would integrate visually with other existing roof top elements to this area of the listed building, and would not look out of place within the wider context of a roofscape for a built block (and wider townscape) that is characterised by diverse shapes, forms and materials.
- 3.9 In response to feedback from officers at pre-application stage, further views testing has been undertaken by the scheme architects to look to demonstrate how very limited any visual effects would be as a result of this space being used by officer workers as an amenity. In key short or long views looking north and south along the main route of Tottenham Court Road such activity would not be readily discernible, largely given the height and set back location of the terrace from the street frontage of the building and also the proportions and built enclosure of the street itself.
- 3.10 It is also recognised that other secondary and longer distance views can be gained of the roofscape of the listed building on Site from locations along the side street of

¹⁰ LB Camden, Pre-Application reference number: 2023/5100/PRE

Tottenham Street off Tottenham Court Road looking east. The DAS includes further study of these views, including from as would be experienced by the pedestrian from viewpoints along Tottenham Street at the south edge of Whitfield Garden (1), further west along this street (2), and then at the junction with Whitfield Street further west again (3). A member of the design team was employed to simulate standing and also seating on the existing flat roof area and then photographed from these viewpoints. These images are also accompanied by street section drawings to further illustrate this relationship.

- 3.11 This views study demonstrates that for viewpoint 1 the presence and movement of any users within this space would be unlikely to be visible from street level. This is again largely due to the height and massing of the existing building and the set back location of the terrace within the depth of the plan at that high level. For viewpoint 2 a seated user would again not be visible, but those standing near front edge of the space could just be glimpsed and partially. For viewpoint 3 both seated and standing users could be observed, but again only partially, and this is the location the greatest distance away from the Site, which itself limits visibility for the naked eye of users of the terrace.
- 3.12 This study shows that where the physical activity of users could be potentially glimpsed from longer distance viewpoints they would in each case be seen against the much taller and more prominent backdrop of existing built / roof form within the depth of the block itself. Visibility would also occur within the context of a variety of existing roof forms, structures and materials to the immediate foreground or on the terrace itself, including plant and railings. Within this context the sight of users on the terrace would have only a very minor effect on the existing visual experience, and would in no way be distracting or disruptive. It should also be noted that any such use of this terrace by office workers would be transitory and dynamic; further limiting any impacts on the existing views and experience of the Site building.
- 3.13 The existing prominence and architectural quality and distinctive features of the main street frontage of the listed building would remain the key characteristic of the background to these views along Tottenham Street, and would in no way be diminished by such activity at high level. The existing clear definition and composition of the main parapet line, tiled mansard roof above, and then secondary roof top elements and plant, would remain clearly legible and very little altered in these views. In this way the heritage significance of the listed building would be sustained, or otherwise unaffected, by these proposals. In this way these proposals would also preserve the key contribution of this building to the surrounding conservation area.
- 3.14 Also in constructive response to officer feedback during the pre-application process, the Applicant would be open and willing to entertain the use of specific planning conditions to any future approval for this scheme by the local planning authority in order to control the how this amenity space would be used. This could include timings of use and also the potential introduction of new elements beyond that described in the application, such as additional planting or furniture.
- 3.15 On the basis of our appraisal of the particular significance of the listed building at Heals and its various areas and elements within the Site, and also its townscape setting and key role within the conservation area, it is our assessment that the proposed roof

terrace would sustain the heritage significance of both this Grade II* listed building complex and also the surrounding Bloomsbury Conservation Area. These proposals would only effect modern fabric or features, and would not alter the form, character and or appearance of this largely modernised roof area to any degree that would affect or detract from the special architectural interest of the building. Great efforts have also been made to ensure that the potentially visibility of the use of this new amenity by the office workers at roof level would be minimised as far as possible through its revised layout and design.

Compliance with relevant Legislation and Planning Policy

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

3.16 It is demonstrated within this section of the report that the application proposals 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 cause no material harm. This scheme would also preserve the character and appearance of the surrounding conservation area, and again cause no harm.

National Policy - NPPF 2023 and NPPG

3.17 In accordance with the requirements of paragraphs 200-201 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.

3.18 In accordance with Paragraph 203 of the NPPF, account has been taken of the desirability of sustaining and enhancing the significance of the affected heritage asset and maintaining this commercial building in a viable use consistent with its conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness. The scheme is considered to achieve this by enhancing an appreciation and understanding of the listed building through this part of a wider scheme of 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, and for the wellbeing of its users.

3.19 In accordance with Paragraph 205, 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 has been designed to a high standard, respect and responses sympathetically to heritage significance, brings benefits to the building and its use and users, and would also avoid harm. It is our overall assessment that the designated heritage assets of both the listed building and conservation area would be conserved and their significance sustained as a result of these works.

3.20 As no harm to heritage significance would be caused by these proposals, the tests in paragraphs 206-208 would not be engaged.

Development Plan

London Plan 2021

- 3.21 The proposed 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

- 3.22 In accordance with Policy D2 (Heritage), these proposals will conserve the designated heritage assets of the listed building on Site and the surrounding conservation area, and sustain, or to a degree enhance, their significance. Any harm to heritage significance would be avoided.

Appendix 1: Baseline Heritage Appraisal (Updated 2023)

Turley Office
12 Brownlow Mews
Roger St
London
WC1N 2JU

T 020 7851 4010