

**Heal's 196 Tottenham Court Road, London,
W1T 7LQ
Planning Statement**

June 2024

Turley

Contents

1.	Introduction	3
2.	Application Site, Surrounding Context and Relevant Planning History	5
3.	Pre-Application Engagement	9
4.	Development Proposals	12
5.	Planning Policy Context	13
6.	Planning Assessment	15
7.	Summary and Conclusions	20

Samuel Brown
Samuel.Brown@turley.co.uk

Kinari Tsuchida
Kinari.tsuchida@turley.co.uk

Client
General Projects

Our reference
GENH3002

24 June 2024

1. Introduction

1.1 This Planning Statement has been prepared on behalf of General Projects ('the Applicant'), in support of a planning application seeking full planning permission and Listed Building Consent ('LBC'), submitted to the London Borough of Camden ('LB Camden') for the proposed minor external alteration works to the sixth floor roof terrace at Heal's Building at 196 Tottenham Court Road, London, W1T 7LQ ('the site').

1.2 The description of development for the application(s) is as follows:

"Minor external alteration works to refurbish the existing flat roof area at the sixth floor level, fronting onto Tottenham Court Road, comprising installation of timber slatted handrail with maintenance access gate, raised composite decking, fitted benches and planters, together with soft landscaping."

1.3 The Applicant undertook extensive pre-application engagement for the first phases of the project in December 2021 and April 2022, during which the Applicant presented their initial vision to optimise the use of the landmark building occupying the site. A series of phased proposals were subsequently consented by LB Camden between June and December 2022 to facilitate the first phase of the site's refurbishment to deliver high quality office and commercial spaces. More recently, the Applicant engaged in further pre-application engagement in June/July 2023 and January 2024 on the latest elements of the ongoing refurbishment of the building.

1.4 The project has continued to evolve over this period, as have the priorities of Applicant and both their existing and prospective tenants. Accordingly, the proposals subject of this application, focus on minor external alteration works to refurbish and repurpose the sixth-floor roof terrace. This is in order to create a high-quality amenity space which complements the quality of the internal refurbishment works already undertaken.

1.5 This Planning Statement sets out why the Council should grant full planning permission and LBC for the proposed development.

Content of the Application

1.6 The planning application for full planning permission and LBC is supported by a suite of technical documents and drawings that are referred to throughout this Planning Statement. The full list of submission material (in addition to this Planning Statement) is as follows:

- Application Form, Ownership Certificates and Notices
- Completed Community Infrastructure Levy (CIL) Form
- Site Location Plan, prepared by White Red Architects
- Block Plan, prepared by White Red Architects

- A suite of Existing and Proposed Floorplans, Elevations and Sections, prepared by White Red Architects
- Design and Access Statement, prepared by White Red Architects
- Heritage Statement, prepared by Turley

Structure of Planning Statement

1.7 This Planning Statement is intended to assist the LPA in its determination of this planning application having regard to the requirements of the Development Plan, the National Planning Policy Framework (the “NPPF”), Planning Practice Guidance (the “PPG”) and any other relevant material considerations. It evaluates the Proposed Development against local and national planning policies and carries out an overall assessment of the planning balance.

1.8 The remainder of this Planning Statement is structured as follows:

- **Section 2: Site, and Planning History** – A review of the site circumstances and surroundings, including reference to any site-specific designations and its planning history;
- **Section 3: Pre-application Consultation Summary** – A summary of the Applicant’s engagement at pre-application stage;
- **Section 4: The Proposed Development** – A summary of the Proposed Development;
- **Section 5: Planning Policy Context** – A review of relevant Planning Policies contained within the National Planning Policy Framework and the Local Development Plan to the consideration of this proposal;
- **Section 6: Planning Assessment** – Provides detail regarding the proposals compliance with the adopted Development Plan and other material considerations; and
- **Section 7: Conclusions** – Provides a summary and conclusion of the proposals.

2. Application Site, Surrounding Context and Relevant Planning History

- 2.1 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.
- 2.2 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.
- 2.3 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). 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.

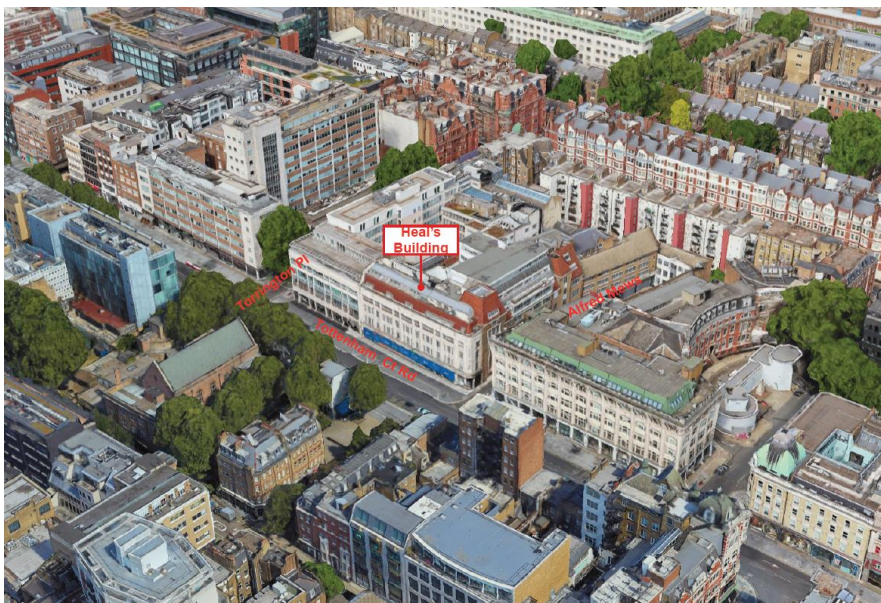


Figure 2.1: Aerial View of the site (Source: Design and Access Statement, prepared by White Red Architects)

Application Site

- 2.4 For clarity, the stage of works that is subject of this application relates to the sixth floor roof terrace of the Heal's Building, fronting Tottenham Court Road (see Figure 2.1 and 2.2). The existing flat roof area to the front of the Heal's building at sixth floor level is

under-utilised. There is a fire escape route that runs alongside the rear wall this provides access through to a lower section of roof plant and informal use as a terraced area for previous occupiers. The remaining area of roof then houses some plant equipment which is raised on steel sections. There is also a domed skylight to the office floor below.

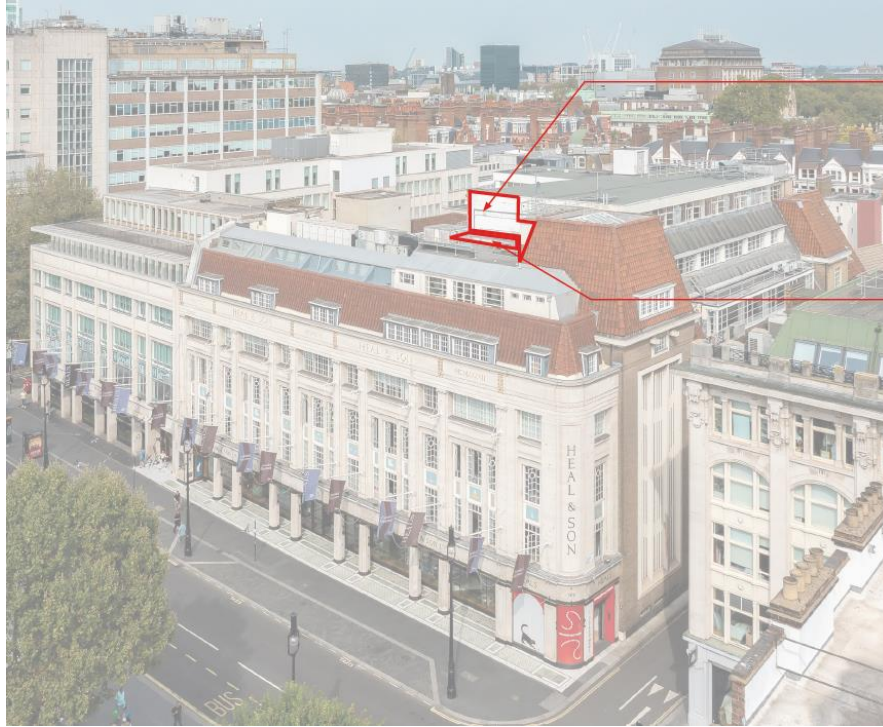


Figure 2.2: Sixth Floor Roof Terrace Location (Source: Design and Access Statement, prepared by White Red Architects)



Figure 2.3: Approximate location of the proposed sixth-floor roof terrace (Source: Google Maps, with annotation indicating location drawn by Turley)

Site Planning History

2.5 As noted above, 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:

- **Temporary hoarding signage along Alfred Mews – Application ref. 2024/0150/A** for the *“Display of no. 3 entrance vinyl (Minerva House); no. 19 window vinyl (Telephone Exchange).”* Validated on 07 February 2024, pending consideration.
- **External Façade, Paving, Canopy and Lighting Works and Installation of Internal DDA Platform Lift – Application ref. 2023/4170/P, 2023/4117/L and 2023/4289/A** for the *“Replacement of existing external cladding, refurbishment of the existing concrete fascia, installation of new metal framed glazing, replacement of the existing projecting canopy with a lightbox canopy, installation of external feature lighting, and replacement of existing paving with new marble/stone paving on Torrington Place; Installation of 6no. new swan-neck light fittings to Alfred Mews”*. Grated on 29 April 2024.
- **Ground Floor Alfred Mews Façade ref. 2022/2084/P and 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.
- **Heal's Entrance – Application ref. 2022/2462/P and 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.
- **Levels 1 and 2 Cat A Office – Application ref. 2022/3692/P and 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.
- **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.
- **Basement and Ground Floor Alfred Mews Works – Application ref. 2022/2599/P and 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.

- **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.

3. Pre-Application Engagement

- 3.1 Pre-application engagement is valuable for the evolution of a development, and it is recognised in the National Planning Policy Framework (2023) at paragraphs 39, 126 and 132 that it has the potential to improve the efficiency and effectiveness of the planning application process for all parties and to ensure that high-quality design is achieved that takes account of the views of the community.
- 3.2 The Applicant initially engaged in pre-application discussions between June and July 2023 regarding the potential terraced area at sixth floor level as part of broad package of refurbishment works. During these initial discussions Officers raised concern over the proposed location and have encouraged the team to explore alternative locations as part of a more comprehensive review the site’s wider roofscape, albeit Officers did not object to the principle of creating additional external amenity space..
- 3.3 Following the initial pre-application meetings in Summer 2023, a follow-up pre-application meeting was held in January 2024 where the Applicant and the design team presented a revised scheme for the roof terrace proposals, informed by the pre-application advice from Summer 2023 and the recommended approach to review the entire roofscape on site. Formal written feedback was received in February 2024.
- 3.4 A brief summary of the key feedback provided by Officers and the Applicant’s response is provided below.

Officer’s Feedback (February 2024)	Applicant Response
<i>During the previous pre-application meeting, the prospect of providing an amenity space/terrace on the 6th floor was discussed and the Council’s response raised concerns over this proposal due to the visibility of the terrace in views down Tottenham Court Road and from Tottenham Street in particular.</i>	<p>In response to the Officer’s feedback received, the roof terrace proposals have been revised and redesigned with the aim to reduce the visibility at street level as much as possible.</p> <p>As set out in the submitted Design and Access Statement (Section 6), views testing has been undertaken to demonstrate the extent of visibility, which is very limited. .</p> <p>In key views looking north and south along the main route of Tottenham Court Road any activity would not be readily visible, as well as from the viewpoint along Tottenham Street at the south edge of Whitfield Garden. This is largely due to the height and massing of the existing building and the set-back location of the terrace from the street frontage.</p>
<i>It was concluded that the principle of a terrace in this location would not be supported given the harm it would cause to the setting of the Grade</i>	The application is supported by a Heritage Statement, prepared by Turley. The Report concludes that the proposed roof terrace

II listed building and the Bloomsbury Conservation Area.

would sustain the heritage significance of both this Grade II* listed building complex and the surrounding Bloomsbury Conservation Area. The proposals is considered to would only impact 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.

Any activity or associated paraphernalia on the roof would harm the roofscape and detract from the overall appearance of the listed building. It is understood that there is a desire to provide amenity space for office workers, however the provision of such space is not considered to be a public benefit that would outweigh the harm caused.

The flatted roof is already accessible to users of the building – the proposals simply seek to deliver a high quality, formalised arrangement that will create a beneficial amenity space for new occupiers. In light of pre-application feedback the proposed terrace area has reduced by over a third to 20sqm (from 31sqm), ensuring it is well set back from the parapet (circa 3.5metres).

The proposals comprise a high-quality design involving sensitive addition of planters and greenery with an existing roof plinth. Whilst unlikely to be visible in any meaningful way (as demonstrated by the views included within the DAS) the placing of planters/tree pots/plants would not constitute development and could simply be undertaken by the Applicant without the need to secure planning permission of LBC.

Raised composite decking is also proposed, providing level access to this part of the building – again this will not be visible in any public views.

The proposed development therefore seeks to deliver sensitive upgrading works to secure its long-term future and optimise its development potential, and to maximise the public benefits this site can deliver.

The introduction of a ‘dummy’ mansard to screen existing rooftop plant is also not supported and would likely draw further attention to the bulk on the roof.

The previously proposed ‘dummy’ mansard has been removed from the latest proposals.

In addition, the proposed glazed balustrades along the roof edge would also not be supported as they are considered to be an inappropriate material for the host building and wider conservation area. The previously proposed glazed balustrades have been removed from the latest proposals.

3.5 The Applicant and the design team 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 further discussed the submitted Design and Access Statement.

4. Development Proposals

4.1 The following section summarises the proposed development. The description of development subject of this full planning application and LBC is as follows:

“Minor external alteration works to refurbish the existing flat roof area at the sixth floor level, fronting onto Tottenham Court Road, comprising installation of timber slatted handrail with maintenance access gate, raised composite decking, fitted benches and planters, together with soft landscaping.”

4.2 The proposed development is summarised in further detail below:

- Repurposing and enhancement of the existing sixth floor roof terrace to create a small amenity terrace for office workers (covering 20sqm of floorspace);
- Reparation and repainting of walls to match existing stone façade;
- Installation of new fitted benches and built in planters;
- Installation of new timber slatted handrail with maintenance access gate;
- Installation of raised composite decking; and
- Retention of the existing maintenance access door, fire escape, skylight and key clamp handrail.



Figure 4.1: CGI Visual of the Proposed Roof Terrace (Source: Design and Access Statement, prepared by White Red Architects)

5. Planning Policy Context

5.1 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.

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

Development Plan

5.3 The Development Plan for LB Camden comprises the following documents which would be referred to in the consideration of any development proposal within the Borough:

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

Adopted Policies Map Designations

5.4 A review of the LB Camden Policies Map (2017) shows that the site is subject to the following designations:

- Fitzrovia Area Action Plan;
- Central Activities Zone (CAZ);
- Bloomsbury Conservation Area;
- Central London Area (CLA);
- Primary Frontage – Tottenham Court Road Central London Frontage (CLF); and
- Protected Vista London View Management Framework (LVMF) – Parliament Hill oak tree to Palace of Westminster.

Other Material Considerations

National Planning Policy Framework (2023)

5.5 The National Planning Policy Framework (updated 2023) is a material consideration in the determination of planning applications.

5.6 Whilst the NPPF does not change the statutory status of the Development Plan as the starting point in decision making, the NPPF constitutes the Government's view of what sustainable development means in practice for the planning system.

5.7 The Government's objective in publishing the framework is to secure a significant culture change in the way planning applications are determined, with a clear presumption in favour of sustainable development, with LPAs proactively driving and supporting sustainable economic development to deliver the homes, business and industrial units, and infrastructure the country needs.

5.8 At the heart of the NPPF and wider Government guidance is the presumption in favour of sustainable development which is considered to represent a 'golden thread' that runs through both plan-making and decision-taking.

National Planning Practice Guidance (PPG) (2024)

5.9 The PPG supplements those overarching objectives of the NPPF. Those elements of the PPG that are considered most pertinent in the determination of this planning application relate to enhancing and conserving the historic environment and the importance of good design.

Supplementary Planning Guidance (SPGs)

5.10 Other policy documents that are material to the consideration and determination of this application for full planning permission and LBC include Camden Planning Guidance (CPG) (which have status as Supplementary Planning Documents), prepared by LB Camden. This includes the following (not an exhaustive list):

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

5.11 All individual policies from the development plan and related to the application site's designations are assessed in the next chapters.

6. Planning Assessment

Design & Heritage

- 6.1 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.
- 6.2 The NPPF contains guidance in relation to development proposals affecting heritage assets and conservation of the historic environment. In particular, paragraphs 195-196 set 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.
- 6.3 London Plan Policy HC1 requires 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.
- 6.4 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 Policy D3 (D) further notes that 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).
- 6.5 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.
- 6.6 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.

Visibility at Street Level

- 6.7 As previously mentioned, during the pre-application engagement in Summer 2023 and January 2024, concerns were raised by the Officers around the visibility of the roof terrace and consequent impact on the setting and appearance of the Grade II listed building and the Bloomsbury Conservation Area.
- 6.8 In direct response to the Officer's feedback, the roof terrace proposals have subsequently been revised with the aim to ensure the proposed roof terrace's minimal prominence at street level in both key short and long views.

- 6.9 The roof terrace is now set back further from the street frontage (circa 3.5metres) and the terrace area has been reduced to 20sqm (from 31sqm as previously proposed at the pre-application meetings), in order to reduce the visibility from the street level, whilst retaining a meaningful amenity space.
- 6.10 The previously proposed 'pergola' style structures, replacement glass balustrading and 'dummy' mansard have all been removed from the revised scheme (see section 2 of the DAS for a summary of the evolution of the proposals), in order to further limit visibility and intervention. As such, the proposals are considered to constitute more attractive, recessive and decluttered design relative to the current (and previously proposed) roofscape condition.
- 6.11 As demonstrated in Section 6 of the DAS, key views have been tested and sight lines prepared. In key views looking north and south along the main route of Tottenham Court Road any activity would not be readily visible, as well as from the viewpoint along Tottenham Street at the south edge of Whitfield Garden. This is largely due to the height and massing of the existing building and the set-back location of the terrace from the street frontage.
- 6.12 From longer distance views (e.g. at the junction with Whitfield Street), some activity could be partially observed, however the proposals at this distance would be seen against the more prominent backdrop of the existing built form , which would be visible behind the terrace planting 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 is not considered to be distracting or disruptive to the appreciation of the Heal's building from the public realm.
- 6.13 As noted by the supporting Heritage Statement, 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 the roof level. In this way the heritage significance of the listed building would be sustained, or otherwise unaffected, and the proposals would also preserve the key contribution of this building to the surrounding Conservation Area, in compliance with paragraphs 195-196 of the NPPF, London Plan Policies HC1 and D3 and Local Plan Policies D1 and D2.

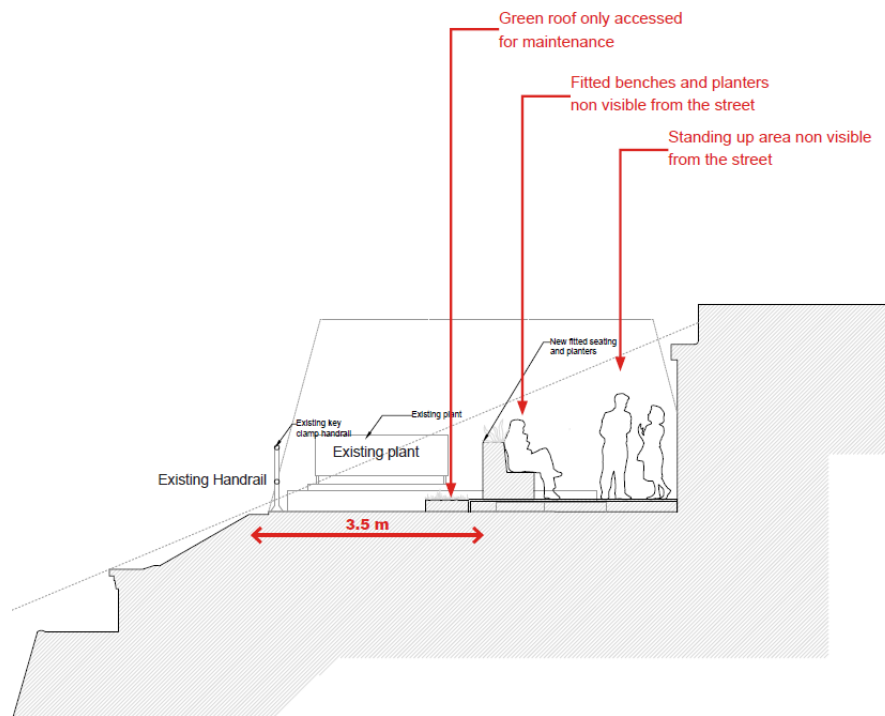


Figure 6.1: Proposed Roof Section (Source: Design and Access Statement, prepared by White Red Architects)

Design, Appearance and Accessibility

- 6.14 The proposed design and colour palette of the framing and planters on the roof terrace will match the red accent used in the Alfred Mews proposals (Application ref. 2022/2084/P and 2022/2089/L) and throughout the wider internal refurbishment of the Heal's complex. The new roof terrace would reactivate the currently underutilised space to deliver an enhanced high quality external amenity space for staff with informal soft landscaping and greenery.
- 6.15 The proposals would also involve the repairing and repainting of walls at roof level, in a high-quality paint finish that is in-keeping with the rest of the façade, ensuring it will sensitively blend with the roofscape and the rest of the Grade II* listed building.
- 6.16 Raised composite decking is proposed for the flooring of the sixth floor roof terrace. This will ensure level access for the users to improve accessibility of this area of the building but also has the benefit of being easily removed for replacement and will ensure no loss of existing roof fabric. Subsequently, the proposals are considered to comprise high quality, proportionate design in accordance with London Plan Policies D3, D5 and HC1 and Local Plan Policies D1 and D2.

Heritage and Roofscape Considerations

- 6.17 The proposals are supported by a Heritage Statement, prepared by Turley. Based on the heritage impact assessment, the Statement concludes the proposed roof terrace would sustain the heritage significance of both the Grade II* listed building and also the surrounding Bloomsbury Conservation Area. The proposals would only affect 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.

- 6.18 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. The proposals would therefore integrate visually with other existing roof top elements to this area of the listed building, and also within the wider context of a roofscape.
- 6.19 Overall, the proposals are considered to be in accordance with paragraphs 195-196 of the NPPF, London Plan Policies HC1 and D3 and Local Plan Policies D1 and D2.



Figure 6.2: CGI Visual of the Proposed Roof Terrace (Source: Design and Access Statement, prepared by White Red Architects)

Amenity

- 6.20 London Plan Policy D3 (D) seeks to ensure that development delivers, *inter alia*, appropriate outlook, privacy and amenity.
- 6.21 At local level, Local Plan Policy A1 requires all proposals to protect the quality of life of occupiers and neighbours and states permission will only be permitted where a development does not cause unacceptable harm to amenity (including visual privacy, overlooking, overshadowing and daylight /sunlight).

Visual Privacy and Overlooking

- 6.22 The proposed roof terrace will repurpose the existing flatted roof area at sixth floor which is informally used as terrace, roof access and fire escape and which is set back from Tottenham Court Road. By virtue of the location of the terrace (fronting the wide Tottenham Court Road), an acceptable separation distance will be maintained between the existing terrace and windows of any sensitive occupiers' properties directly facing the terrace on the opposite side of Tottenham Court Road which is at a minimum circa 30metres (with the majority at least 45metres away).

- 6.23 As noted above, the previous pre-application proposals included the installation of replacement glass balustrading and introduction of a 'dummy' mansard to screen existing rooftop plant which have both now been omitted. As such, the proposed timber balustrading and greenery and the retention of existing key clam handrails represent improved proposals in terms of visual amenity.
- 6.24 Furthermore, by virtue of the wide width of the footpath and road of Tottenham Court Road, it is considered that there would be no adverse impacts upon the existing amenity of neighbouring sensitive occupiers with regards to visual privacy and overlooking in accordance with London Plan Policy D3 and Local Plan Policy A1.

Other Amenity Considerations

- 6.25 As noted above, the proposed roof terrace will repurpose the existing flat roof and therefore do not result in any increase in external built form envelope, massing or height of the existing building. Therefore, the proposals have been sensitively designed to ensure no detrimental impacts on the neighbouring sensitive occupiers, in terms of overshadowing and daylight/ sunlight, in accordance with London Plan Policy D3 and Local Plan Policy A1.

7. Summary and Conclusions

- 7.1 This planning application seeks to planning permission and LBC for the following development:

“Minor external alteration works to refurbish the existing flat roof terrace area at the sixth floor level, fronting onto Tottenham Court Road, comprising installation of timber slatted handrail with maintenance access gate, raised composite decking, fitted benches and planters, together with soft landscaping.”

- 7.2 This Planning Statement has demonstrated how the proposals have been developed in consideration of the planning and surrounding context and are considered to be in accordance with National Planning Policy and the local Development Plan.
- 7.3 Overall, the proposals would constitute sensitive, high-quality improvements to the appearance, maintenance and functionality of this landmark building, while conserving and sustaining the significance of the heritage asset. By refurbishing and repurposing the existing sixth floor roof terrace to provide enhanced amenity space for the office workers, the proposals are considered to enhance the appreciation and understanding of the listed building as part of the wider scheme of refurbishment works, and also the associated optimising of the viable commercial use and vitality of the wider complex for the iconic Heal’s brand.
- 7.4 The proposals are therefore considered to secure the site’s long-term future and maximise the public benefits the site can deliver, further contributing to the continued function of the Tottenham Court Road Growth Area and the wider CAZ.
- 7.5 In summary, the proposals for the site are considered to be in accordance with the planning polices of the NPPF, London Plan and Camden Local Plan, and we therefore respectfully request that planning permission and LBC are granted.

Turley Office
Brownlow Yard
12 Roger Street
London
WC1N 2JU

T 020 7851 4010