

08 November 2024

Submitted via Planning Portal (Ref: PP-13451724)

Ref: 01856

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

Dear Sir/Madam,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)

PLANNING (LISTED BUILDING AND CONSERVATION AREAS) ACT 1990

APPLICATION FOR FULL PLANNING PERMISSION AND LISTED BUILDING CONSENT

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

On behalf of our client, Heals I UK Propco Ltd and Heals II UK Propco Ltd ('the Applicant'), we hereby submit an application for full planning permission and listed building consent ('LBC') to Camden London Borough Council ('LB Camden'), in its role as Local Planning Authority ('LPA'), for the proposed roof repair and minor alteration works at the above site. Specifically, the proposed description of development is as follows:

"External alteration works to refurbish parts of the existing flat roof areas by laying out replacement roofing materials."

THE SITE AND APPLICATION BACKGROUND

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 with the Heal's department store, fronting onto Tottenham Court Road. The site operates under Use Class E except for the existing residential flats within the site (Use Class C3), which do not form part of the planning application boundary in this instance.

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

More generally, the site is located within the Tottenham Court area of the West End (an identified growth area under Camden's Local Plan) and the Central Activities Zone (CAZ) (as per the London Plan). 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.

Application Site

For clarity, the roof areas which are subject of this application relates to parts of Roof 1 and 10 (see Figure 1 below).

These roof areas are concealed behind various roofing structures and forms associated with the existing Heal's Building complex and therefore are not visible in any public views at street level. As highlighted in the submitted Design and Access Statement (prepared by Waterman LLP), the flat roof areas have been altered substantially over the years, including new surface treatments and servicing and other ad-hoc minor fixtures and fittings.



Figure 1: Approximate location of Roof 1 and 10, looking East (Source: Google Map, with annotation indicating location drawn by Turley)

SITE PLANNING HISTORY

The proposed development forms an important element 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 two years. The refurbishment proposals have been delivered through multiple phases under the following approved planning applications:

- **Minor alterations to the Sixth Floor Roof terrace – Application ref. 2024/2789/P and 2024/2812/L** for “Installation of timber slatted handrail with maintenance access gate, raised composite decking, fitted benches and planters, together with soft landscaping to create a roof terrace at sixth floor.” Granted on 03 October 2024.

- **Temporary hoarding signage along Alfred Mews –Application ref. 2024/0150/A and 2024/3059/L** for the *“Display of no. 3 entrance vinyl (Minerva House); no. 19 window vinyl (Telephone Exchange).”* Granted on 12 September 2024.
- **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”*. Granted 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.

PROPOSED DEVELOPMENT

The proposals subject of this full planning permission and LBC seek to undertake urgent minor repair and alteration works to parts of the existing flat roof areas (Roofs 1 and 10). The proposed works are critical as the existing roofs are in poor condition and are causing extensive internal leaks within tenanted office spaces.

The works will principally comprise of removing the existing non-original flat roofing, and replacing with high quality materials and introducing insulation, where possible. The works are required to prevent

further worsening of the leaks, whilst carrying out sensitive external refurbishment works to ensure the long-term usability and function of the office accommodation below.

The proposed roofing materials will be laid out over roof sections and match the existing roof condition. This will comprise the following for all roof areas:

- Primed generic deck
- Air and vapour control layer (AVCL)
- Insulation (where possible)
- Carrier membrane
- Fully embedded Langley PU embedment coat with Langley GFM reinforcement
- Langley PU topcoat

For more technical details, please refer to the submitted Specification Document and Detailed Drawings, prepared by Langley.

PLANNING POLICY AND SITE DESIGNATIONS

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts should be made in accordance with the development plan unless material considerations indicate otherwise. The current adopted Development Plan relevant to the site comprises of the following planning policy documents:

- The London Plan (2021)
- Camden Local Plan (2017)
- Fitzrovia Area Action Plan (FAAP) (2014)

Adopted Policies Map Designations

According to LB Camden's adopted Policies Map, the site is subject to the following site designations:

- Central Activities Zone (CAZ)
- Fitzrovia Area Action Plan (FAAP)
- Bloomsbury Conservation Area
- Central London Area
- Protected Vista London View Management Framework (LVMF) – Parliament Hill Oak Tree to Palace of Westminster

National Planning Policy Framework (2023)

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

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.

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.

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)

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) and Documents (SPDs)

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):

- Amenity CPG (2021)
- Design CPG (2021)
- Employment Sites and Business Premises CPG (2021)

PLANNING ASSESSMENT

This section assesses the Proposed Development in the context of the policies from the adopted Development Plan and other material considerations.

Principle of Development – Refurbishment of flat roof areas for existing office accommodation

London Plan Policy E1 supports the refurbishment of existing office space. This is further supported by Local Plan Policies E1 and E2 which state that the existing employment premises and sites will be safeguarded and protected for continued business use especially those that support the functioning of the CAZ or the local economy.

As such, the principle of refurbishing the flat roof areas is considered to be in accordance with the above policies as the proposed works are urgently needed to prevent further worsening of the leaks to ensure the long-term usability and function of the existing office accommodation below, further contributing to the wider CAZ.

Design and Heritage

The Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be paid to the desirability of preserving the special architectural or historic interest of a Listed Building or its setting. The NPPF contains guidance in relation to development proposals affecting heritage assets and conservation of the historic environment. In particular, Paragraphs 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.

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.

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.

At local level, Local Plan Policy D1 confirms that the Council will seek to secure high quality design in development and requires that, *inter alia*, it respects local context and character and preserves or enhances the historic environment and heritage assets. Local Plan Policy D2 further notes that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings. The policy confirms the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset, unless the public benefits of the proposal convincingly outweigh that harm.

The proposals are supported by a Heritage Statement ('HS'), prepared by Turley Heritage. The HS concludes that the proposed roof works will affect mostly non-original modern post-war fabric, of very low significance and over small areas. Given the nature of previous alteration and existing surrounding servicing across these roof levels, the minor additional works will not affect appreciation of the building's significance.

In addition, due to its location being concealed by various roofing elements and existing buildings of the Heal's complex, the works will not be visible at street level and therefore will not impact the key elevations such as Tottenham Court Road and Torrington Place. Proposed sections for roofing will only be fully visible from enclosed private areas, well away from any key views. Since there are already many existing modern surface materials, service elements and later fixtures, the proposed roofing will integrate visually with other existing rooftop elements to this area of the listed building, and also within the wider context of a roofscape. On this basis, the character and appearance of the Bloomsbury Conservation Area and its significance will unaffected and sustained.

Overall, the proposals are considered to sustain the heritage significance of both this Grade II* listed building complex and the surrounding Bloomsbury Conservation Area, in accordance with paragraphs 195-196 of the NPPF, London Plan Policies HC1 and D3 and Local Plan Policies D1 and D2.

SUMMARY

This application seeks full planning permission and LBC seek to undertake urgent minor roof repair works to the Heal's Building. The works will protect the office accommodation below from water damage associated with the currently leaking roof.

Overall, the proposals would constitute sensitive, high-quality improvements to small parts of the existing flat roof areas (which in this part of the roof are largely non-original) of this landmark building, while conserving and sustaining the significance of the heritage assets. By carrying out essential roof repair works, the proposals will enhance the appreciation and understanding of the listed building, and also the

associated optimising of the viable office accommodation and vitality of the wider complex for the iconic Heal's brand.

In summary, the proposals are considered to be in accordance with the planning policies of the NPPF, London Plan and Camden Local Plan, and we therefore respectfully request that planning permission and LBC are granted.

SUBMISSION DOCUMENTS

This application for full planning permission is accompanied by the following documents in addition to the Application Form, CIL Form and Legal Notices:

- Location Plan, prepared by Workman LLP
- Site Plan, prepared by Workman LLP
- A suite of Existing and Proposed Roof Plans and Elevations, prepared by Workman LLP
- Design and Access Statement, prepared by Workman LLP
- Planning Covering Letter (this document), prepared by Turley
- Heritage Statement, prepared by Turley
- Detailed Drawings, prepared by Langley
- Specification Document, prepared by Langley

A payment for the requisite planning application fee of £363.00 has been made via the Planning Portal.

We trust that the information provided is sufficient to enable the Council to validate and permit this full planning application and LBC look forward to receiving confirmation of this at the earliest opportunity. In the meantime, please contact myself or my colleague Sam Brown (Samuel.brown@turley.co.uk) and Harry Best-Shaw (harry.best-shaw@turley.co.uk) at these offices if you have any queries.

Yours sincerely



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Planner

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