



Historic England

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Our ref: P01585873

24 December 2024

Dear Mr Fowler

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

125 SHAFTESBURY AVENUE LONDON WC2H 8AD

Application No. 2024/5408/P

Thank you for your letter of 4 December 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The proposals are for refurbishment and extension of an existing office building set between two main Victorian thoroughfares of the West End, and which is surrounded by conservation areas and listed buildings. The proposed stepped shoulder on the Shaftesbury Avenue elevation would break with the architectural precedent set up and down this sweeping, principal street, without apparent rationale, causing harm to the historic character which is the setting of Seven Dials Conservation Area and the former Saville Theatre. Taken together, legal duties and national policy protect the special heritage significance of both conservation areas and listed buildings, including from harmful changes in their settings. A modest revision to the Shaftesbury Avenue elevation of the new proposal is needed to design a more balanced and formal frontage to this street, which will support its established character and avoid harmfully weakening the settings of its historic neighbours.

Historic England Advice

Significance

125 Shaftesbury Avenue is a 1980s office building of negligible heritage significance, which in some respects detracts from the settings of some of the many listed buildings



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and conservation areas that surround its site between two of the main West End thoroughfares.

Shaftesbury Avenue

Both of these - Charing Cross Road and Shaftesbury Avenue - were formed in the 1880s by the Metropolitan Board of Works. Shaftesbury Avenue varies in character along its length: the more elaborate buildings of the heart of 'Theatreland', west of Charing Cross Road, using gestures like corner turrets and cupolas to draw attention, while plainer buildings towards the east offer fewer moments of vertical emphasis. Notwithstanding such features however, right from Piccadilly Circus to Princes Circus, buildings present evenly balanced facades to this sweeping street, with fairly regular shoulders carried across the width of their plots and standing at between four and at most eight storeys above ground.

Conservation Areas and Listed Buildings

Outside any conservation area itself, the current building on the site is highly visible from parts of the Denmark Street Conservation Area and the Seven Dials Conservation Area in the London Borough of Camden - within which it also sits - and from the adjacent Soho Conservation Area of the City of Westminster. It has a lesser presence in the Westminster's Chinatown Conservation Area and Camden's Bloomsbury Conservation Area too.

The Denmark Street Conservation Area directly adjoins the site to its north and is characterised by a great variety of building types and ages, from the 17th to 21st centuries, on a layered historic street plan. It contains listed buildings which stand very close to the site, including the Phoenix Theatre (Grade II) and farther off the church of St Giles in the Fields (Grade I).

The western part of the Seven Dials Conservation Area contains the buildings of the south-side of Shaftesbury Avenue and the north-east quadrant of Cambridge Circus, which date to the years after the creation of these highways in 1889. They share red brick and terracotta as characteristic materials and their subtly varied architectural expression is generally unified by strongly consistent shoulder heights.

The former Saville Theatre (Grade II) is immediately adjacent to the site to the east. Though outside the boundary of either of the conservation areas, it is the buildings within these that make the greatest part of the positive contribution to significance that the theatre derives from the survival of its original street setting in the surviving historic buildings of the avenue. The bold composition and strong horizontality of the theatre's slightly convex facade, with its frieze and parapet cornice, play on the sweep of the



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historic avenue and its picturesque rooflines, decorated with minor dormers, gables or even turrets. The buildings which flank it - including the existing building on the site - are, on the other hand, visually unsympathetic, but do currently reflect the essential formal patterns of Shaftesbury Avenue.

The City of Westminster's Soho Conservation Area contains the fine-grained townscape of Old Compton Street, views east from which are closed by the current building. It also contains the three other quadrants of Cambridge Circus, which offers views of the two main street frontages of the site. Westminster's Chinatown and Covent Garden Conservation Areas are nearby, but are generally inward-looking, focused on core streets and spaces away from the site.

Impact of the proposals on significance

The new scheme

The proposals follow the 2018 approved scheme in essence, but create an additional overall increase in floorspace and massing. The existing 11-storey building was approved for extension to a 12 storeys, with an uplift of 9,682sqm of floorspace. The new proposals would give it 13 storeys and a net increase of 10,434sqm of floorspace, retaining more of the existing structural frame than previously and introducing a lower-carbon façade. It would target outstanding operational sustainability, and as in the previous scheme, introduce more active frontages and reinstate a needed pedestrian link between Old and New Compton Streets.

The existing building already rises considerably higher than others in the near vicinity by progressively stepping back from its main facades. The proposed development would rise higher than either the existing building or the previously approved scheme. Like the latter, the proposed building would retain the overall pyramidal form of the existing, but would deploy greater variation in the arrangement and expression of its upper levels than the current building's repetitive tiers.

The new scheme's impact on the historic environment

Because of its additional height, the proposed development would become more visible than the top of the existing building in middle- and long-range views, particularly from key streets and spaces in the Soho and Denmark Street conservation areas, and glimpses from the edge of the Chinatown and Covent Garden conservation areas. Notwithstanding this, its top storeys, following those of the previously approved scheme, would have a lighter-weight and less monolithic appearance than the existing building. The proposed development would generally resolve its additional mass in a way similar enough to the previously approved scheme that their impact in views on



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the surrounding conservation areas is likely to be broadly the same.

The proposed development would differ markedly in its impact on Shaftesbury Avenue, however, and in the setting of the designated heritage assets it neighbours there. The proposed composition on this principal elevation would depart markedly from all precedent on the site and the street. It would, as before, create an improved street setting through retail frontage and first-floor façade. Instead of rising to a subtle parapet to express a flat shoulder above the sixth floor as previously approved, however, the two right-hand bays of the four-bay frontage would rise a further two full storeys. The resulting frontage to Shaftesbury Avenue would be strongly asymmetrical and would lack a formal resolution untypical of and unsympathetic to the streets historic appearance and its prevailing character.

As the street elevation collages in section 2.10 of the Design & Access Statement show, no other building on the street is so asymmetric or so completely abandons horizontality at the top of its street façade. Most present a more formal composition and stronger horizontality to the façade and roofline on this principal route. The effect of disrupting this basic principle, which creates the street's sweeping character and structures its architectural variety, would be harmful to the character and appearance of the Seven Dials Conservation Area and to the setting of the former Saville Theatre.

Planning policy relevant to the applications

Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty on local planning authorities to consider the impact of proposals upon listed buildings and their settings, and to pay special regard to preserving or enhancing the character or appearance of conservation areas.

Government guidance on how to carry out those duties is found in the National Planning Policy Framework (NPPF) 2024. Paragraph 208 of the NPPF establishes the importance of avoiding or minimising any conflict a proposal might have with the conservation of a designated asset. Paragraph 212 sets out that when considering the impact of any development on the significance of a heritage asset, the local planning authority will need to give great weight to the asset's conservation irrespective of whether any harm would be substantial or less-than-substantial. Paragraphs 213 and 215 stipulate that any harm requires clear and convincing justification, and should be weighed against the public benefits - including heritage benefits - of the proposal.

Camden's Local Plan (2017) and the ongoing Local Plan review contain policies which support these objectives of national policy. The Seven Dials Conservation Area Statement (1998) describes the distinctive scale and character of Shaftesbury Avenue, which evolves along its length, and the importance of views up and down it in each



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direction.

Historic England's position on the proposals

The significant change to the compositional approach on Shaftesbury Avenue would introduce a novel harm within the settings of two heritage assets that the existing building and previously approved proposals logically avoided through contextual design. This impact is presented without precedent or direct justification, and as such would appear to be unnecessary.

The taller right-hand bays of the frontage would not read as a corner feature, a turret or eye-catcher on Shaftesbury Avenue: their facades are to be treated just the same as the lower bays to the west. They would appear as a two-part, stepped façade, more typical of the composition of a side elevation than the frontage to a principal street. In contrast, both the existing building and the previously approved proposals present a balanced, essentially symmetrical and somewhat formal façade to Shaftesbury Avenue. The reason for this shift in approach is not made clear. It does not seem to relate to any new or approved development in the context. No rationale is explained in the Design & Access Statement, and indeed the top of the elevation is cropped out of the image in the streetscape analysis on page 82. The proposed split frontage and stepped shoulder would appear to serve no positive architectural purpose.

This proposed development does present many of the enhancements in appearance and urban design that would have been achieved by the previously approved scheme, and Historic England welcomes these along with its considered approach to sustainability. It would nonetheless be unacceptable to needlessly harm the character and appearance of the Seven Dials Conservation Area and the significance of the Former Saville Theatre. We strongly encourage a revision of the proposals for the Shaftesbury Avenue elevation to avoid this harm and instead to support the value of the historic environment on this emblematic West End street.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 208-215 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and of section



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72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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