

51-52 Tottenham Court Road

London W1T 2EQ

Heritage appraisal and justification of proposals

Including an assessment of the proposed development in terms of Planning Policy Statement 5: Planning for the Historic Environment



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Consultancy for the
Historic Built Environment

KMI Heritage

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1.0 Summary

51 and 52 Tottenham Court Road are a pair of buildings on the west side of Tottenham Court Road and are located in the Charlotte Street Conservation Area. This part of the conservation area, that includes the block between Windmill Street and Goodge Street on Tottenham Court Road is characterised by variety: there are twelve building in this part of the street, and each is very different from the other. They vary in age, plot width, height, material, fenestration, and decoration.

51 and 52 Tottenham Court Road are very altered and dilapidated. They are both brick buildings, but the brick facades to Tottenham Court Road have been painted white. The pitched roof to No. 52 is missing. The roofs of No. 51 are in artificial slate, with some kind of pressed metal (probably zinc) parapet flashing tacked to the masonry and around the dormer windows. The rear return roofs are in modern tile or artificial slate.

The Charlotte Street Conservation Area Appraisal identifies the properties to be 'positive contributors' to the conservation area. However, when tested against Appendix 2 of English Heritage's 'Guidance on Conservation Area Appraisals', it is clear that the contribution, if any, that 51-52 Tottenham Court Road make to the Charlotte Street Conservation Area is very limited.

The new building will replace the dilapidated and unremarkable existing buildings with a well-designed new scheme that is clearly of its time, and will provide sensible, useable accommodation consistent with the land-use objectives of the Council.

The new building will be inherently accessible and sustainable, and will bring significant economic benefits to the area. It would not harm the setting of any listed buildings, and it would enhance the character and appearance of the conservation area.

The proposed development is consistent with national and local policies and guidance for the historic built environment.

2.0 Introduction

2.1 This report has been prepared by KMHeritage in order to support an application for conservation area consent and planning permission for redevelopment. It relates to the buildings at 51-52 Tottenham Court Road, London W1T 2EQ.

Purpose

2.2 The purpose of the report is to assess the proposed development against national and local policies relating to the historic built environment.

2.3 This report should be read in conjunction with the drawings prepared by B+C Architectes and the planning report.

2.4 **This is a revised report:** our original 'PPG15' report was drafted in November 2009. On Tuesday 23 March 2010, Planning Policy Statement 5: Planning for the Historic Environment replaced Planning Policy Guidance 15 (Planning and the Historic Environment, 1995) and Planning Policy Guidance 16 (Archaeology and Planning). This report justifies the proposals in terms of the policy and guidance contained in the new PPS.

Organisation

2.5 This introduction is followed by a brief description of the buildings, and an outline in Section 4 of the proposed scheme. Section 5 sets out the national and local policy and guidance relating to the historic built environment that is relevant to this matter. Section 6 describes the benefits of the scheme, and Section 7 assesses the proposed development against that policy and guidance. Appendices contain a location plan and photographs.

Author

2.6 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. He was an Inspector of Historic Buildings in the

London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark, and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect, and has a specialist qualification in urban and building conservation. Kevin Murphy was included for a number of years on the Heritage Lottery Fund's Directory of Expert Advisers.

3.0 The building

The area

- 3.1 Tottenham Court Road forms the first part of the principal historic route from central London to the former outlying village of Hampstead. It derives its name from Tottenham Court, the Tottenhall manor house that stood north of the Euston Road.
- 3.2 The street between the junction of Oxford Street and the Euston Road is almost exclusively commercial in character, and this has been the case since the middle of the 19th century. Its earliest buildings date from this period, and most remaining older buildings are from the period prior to the First World War. Many are post Second World war - a substantial proportion of the street consists of modern office and retail buildings.
- 3.3 In the 19th century the street became notable for furniture making, and this gave rise to a number of department stores and warehouses in the early 20th century, replacing the earlier terraces. This character has, in turn, been replaced with the more modern appearance and retail nature of the street; only Heals survives as a general household store, and Tottenham Court Road is now known for electrical and hi-fi goods.

The buildings

- 3.4 51 and 52 Tottenham Court Road are a pair of buildings on the west side of Tottenham Court Road between Windmill Street and Goodge Street.
- 3.5 No 51 is four bays wide and three storeys high, with a mansard roof containing two dormer windows to the street. An archway through to the rear of the property is located on the southern side of the ground floor. The rest of the ground floor is taken up by a modern shop front. The eight windows on the first and second floor are timber sliding sashes.

- 3.6 No 52 is four storeys high, and narrower, with two bays. The ground floor is occupied by a modern shop front. The three storeys above have two window sliding sash windows per floor, and the windows are grouped vertically by a brick architrave rising to a brick arch with a keystone. The parapet has a cornice. There is a flat, asphalt roof.
- 3.7 To the rear, the site is complex. There are returns to both buildings, with monopitch roofs falling from a party wall on the boundary between them. Two small projections occur to the rear of 52 Tottenham Court Road at first floor, and there is a narrow passageway between the return and the boundary with the next property to the north. There is also a flat-roofed projection at first and second floor to the rear of No 51 Tottenham Court Road, creating a two storey light-well against the party way between 51 and 52, and forming a link to the accommodation above ground floor at the back of the return. This takes the form of a timber shed placed on top of what seems to have been originally a single storey return.
- 3.8 A large office building at 6-10 Whitfield Street, recently extended, sits immediately to the west of the rear, separated by a narrow alley.
- 3.9 Both buildings are very altered and dilapidated. They are both brick buildings, but the brick facades to Tottenham Court Road have been painted white. The pitched roof to No. 52 is missing. The roofs of No. 51 are in artificial slate, with some kind of pressed metal (probably zinc) parapet flashing tacked to the masonry and around the dormer windows. The rear return roofs are in modern tile or artificial slate.
- 3.10 Photographs of the existing condition of the buildings are provided in Appendix C.

The surroundings of the site

- 3.11 51-52 Tottenham Court Road are located in the Charlotte Street Conservation Area, on its boundary with the Bloomsbury Conservation Area and which extends eastwards from Tottenham Court Road. The Charlotte Street Conservation Area Appraisal and Management Plan identifies the properties to be ‘positive contributors’ to the conservation area.
- 3.12 The Rising Sun public house at the junction of Windmill Street and Tottenham Court Road is listed as are 2-8 Goodge Street (64 Tottenham Court Road), and 65 to 67 Tottenham Court Road. All are Grade II.

The character and appearance of the conservation area.

- 3.13 The part of the Charlotte Street Conservation Area that includes the block between Windmill Street and Goodge Street on Tottenham Court Road is characterised by variety: there are twelve building in this part of the street, and each is very different from the other. They vary in age, plot width, height, material, fenestration, and decoration. The conservation area appraisal acknowledges this by observing that ‘Tottenham Court Road is notable for the variety of heights, building styles and materials along the frontage’. The only unifying characteristic of this row is the ground floor retail use. This variety may reflect the constant evolution of the street from the middle of the 19th century as it became a retail centre, and this continuing evolution is reflected in the presence of the recent new development at 55 Tottenham Court Road.

The contribution of 51-52 Tottenham Court Road to the Charlotte Street Conservation Area

- 3.14 The Charlotte Street Conservation Area Appraisal and Management Plan contains, at Appendix 5, a ‘Built Heritage Audit’, and this is illustrated in a separate map. The Audit identifies listed buildings, ‘positive

contributors’, shop fronts of merit, elements of streetscape interest, and ‘detractors’. 51-52 Tottenham Court Road are shown as, in the Council’s opinion, making a positive contribution to the conservation area.

3.15 However, Appendix 2 of English Heritage’s ‘Guidance on Conservation Area Appraisals’ provides a checklist for unlisted buildings in conservation areas. The following table assesses 51-52 Tottenham Court Road against the criteria in the checklist.

English Heritage criteria	Assessment
Is the building the work of a particular architect of regional or local value	No – the architect is anonymous.
Has it qualities of age, style, materials or any other characteristics which reflect those of at least a substantial number of the buildings in the conservation area?	No – these two properties are, if anything not characteristic of the part of the conservation area in which they are located and are not similar to a ‘substantial number of the buildings in the conservation area’
Does it relate by age, materials or in any other historically significant way to adjacent listed buildings, and contribute positively to their setting?	No –the buildings is completely different in style and architectural treatment to the Rising Sun, . 2-8 Goodge Street (64 Tottenham Court Road), and 65 to 67 Tottenham Court Road.
Does it individually, or as part of a group, serve as a reminder of the gradual development of the settlement in which it stands, or of an earlier phase of growth?	Yes, but only to a limited degree and this is compromised by the degree of change which has occurred to the properties.
Does it have significant historic association with established features such as the road layout, burgage plots, a town park, or a landscape feature?	No – the properties simply face Tottenham Court Road without any notable relationship to a public space or feature
Does the building have landmark quality, or contribute to the quality of recognisable spaces, including exteriors or open spaces with a complex of public buildings?	No

English Heritage criteria	Assessment
Does it reflect the traditional functional character of, or former uses within, the area?	No – there is no discernible connection with or evidence of a former use
Has it significant historic associations with local people or past events?	No
Does its use contribute to the character or appearance of the conservation area	No
If a structure associated with a designed landscape within the conservation area, such as a significant wall, terracing or a minor garden building, is it of identifiable importance to the historic design?	N/A

3.16 It is clear from this exercise that the contribution, if any, that 51-52 Tottenham Court Road make to the Charlotte Street Conservation Area is very limited.

4.0 The proposed development

- 4.1 The proposed redevelopment of 51-52 Tottenham Court Road are illustrated in the design drawings of B+C Architectes and described in the accompanying the planning report.

The scheme

- 4.2 The scheme replaces the buildings that presently occupy the site of 51-52 Tottenham Court Road with a new and distinctly modern building comprising of retail at ground and basement levels, with residential units on five levels above.
- 4.3 The accommodation is composed of retail at ground and basement, with five flats and twenty student units on first to fifth floor. The flats are located on first and second floors and consist of three two-bed units, one one-bed unit and a studio. The student accommodation is located at third, fourth and fifth floors, with seven student studios at third and fourth, and three at fifth floor. Each of the floors containing student studios has a communal kitchen area.
- 4.4 The new building retains the archway that exists at present, and also echoes the individual identities of the existing buildings. The new building steps in height, and the fenestration changes, across the width of the façade. The lower southern part is four bays wide, and the higher northern part is two bays wide. The proportions of the windows in the two parts are different.
- 4.5 The southern part has four storeys over ground floor, but the top most storey is a 'green' façade, forming a kind of contemporary mansard. The top of the third floor beneath the 'green' façade lines up with the parapet of No. 49 Tottenham Court Road. This is also the line of the parapet to Nos. 53 and 54 Tottenham Court Road.
- 4.6 The new building is strongly expressed in modern materials, and the façade to Tottenham Court Road is clad

in a translucent white polycarbonate. This is gridded, so that the parapet relationship described above is clearly discernible. The topmost storey of the northern part of the building is treated differently, with a metal 'brise-soleil', and this helps reduce the perceived scale of the building in a manner similar to the 'green' mansard.

- 4.7 The plan of the building is L-shaped, moving the bulk of the building behind the street frontage to the northern boundary of the site, and thus creating a far more open space to the rear. A 'green' roof is provided above the ground floor retail, and this is the view from the inward-facing residential windows.

5.0 The policy context

5.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment

National policy: Planning Policy Statement 5

5.2 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990.

5.3 On Tuesday 23 March 2010, the Government published the new Planning Policy Statement 5: Planning for the Historic Environment, which replaces Planning Policy Guidance 15 (Planning and the Historic Environment, 1995) and Planning Policy Guidance 16 (Archaeology and Planning) with immediate effect.

5.4 The PPS sets out planning policies on the conservation of the historic environment. It is accompanied by a 'Planning for the Historic Environment Practice Guide', published by English Heritage 'to help practitioners implement the policy, including the legislative requirements that underpin it'. The PPS consists of an introductory section called 'Planning for the Historic Environment' and a 'Policies' section. The 'Policies' section is divided into 'Plan-making policies' and 'Development Management'.

5.5 The 'Government's Objectives' in respect of the historic built environment are defined as

- To deliver sustainable development by ensuring that policies and decisions concerning the historic environment:
- To conserve England's heritage assets in a manner appropriate to their significance; and
- To contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment

and to make this publicly available, particularly where a heritage asset is to be lost.

5.6 The 'Planning for the Historic Environment Practice Guide' urges local planning authorities and applicants to consider 'the embodied energy within existing buildings and the whole-life costs of any new scheme or proposed alterations'.

5.7 Paragraph 10 of the 'Planning for the Historic Environment Practice Guide' says:

A key feature of the PPS is its holistic approach to the historic environment. The elements of the historic environment that are worthy of consideration in planning matters are called 'heritage assets'. This term embraces all manner of features, including: buildings, parks and gardens, standing, buried and submerged remains, areas, sites and landscapes, whether designated or not and whether or not capable of designation.

5.8 Annex 2 of the PPS provides a formal definition of the term 'heritage asset':

A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets (as defined in this PPS) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).

5.9 Policy HE3 'Regional and local planning approaches' indicates how regional spatial strategies and local development frameworks 'should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area'. It describes the contribution of the historic environment 'by virtue of':

(i) its influence on the character of the environment and an area's sense of place;

(ii) its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development;

(iii) the stimulus it can provide to inspire new development of imaginative and high quality design;

(iv) the re-use of existing fabric, minimising waste; and;

(v) its mixed and flexible patterns of land use that are likely to be, and remain, sustainable.

5.10 Policy HE6 of the PPS, 'Information requirements for applications for consent affecting heritage assets', requires applicants 'to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance' so as 'to understand the potential impact of the proposal on the significance of the heritage asset'. This information 'together with an assessment of the impact of the proposal' should be incorporated in applications.

5.11 Policy HE7 is entitled 'Policy principles guiding the determination of applications for consent relating to all heritage assets'. Paragraph HE7.2 says:

In considering the impact of a proposal on any heritage asset, local planning authorities should take into account the particular nature of the significance of the heritage asset and the value that it holds for this and future generations. This understanding should be used by the local planning authority to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.

5.12 Paragraph HE7.4 says:

Local planning authorities should take into account:

– the desirability of sustaining and enhancing the significance of heritage assets, and of utilising their positive role in place-shaping; and

– the positive contribution that conservation of heritage assets and the historic environment generally can make to the establishment and maintenance of sustainable

communities and economic vitality by virtue of the factors set out in HE3.1

5.13 Paragraph HE7.5 says:

Local planning authorities should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use.

5.14 The 'Planning for the Historic Environment Practice Guide' gives, at Paragraph 79, a number of 'potential heritage benefits that could weigh in favour of a proposed scheme' in addition to guidance on 'weighing-up' [sic] proposals in Paragraphs 76 to 78. These are that:

- It sustains or enhances the significance of a heritage asset and the contribution of its setting;
- It reduces or removes risks to a heritage asset;
- It secures the optimum viable use of a heritage asset in support of its long term conservation;
- It makes a positive contribution to economic vitality and sustainable communities;
- It is an appropriate design for its context and makes a positive contribution to the appearance, character, quality and local distinctiveness of the historic environment;
- It better reveals the significance of a heritage asset and therefore enhances our enjoyment of it and the sense of place.

5.15 Policy HE9 provides 'Additional policy principles guiding the consideration of applications for consent relating to designated heritage assets'. It sets out a basic presumption in favour of the conservation of designated assets, and says that 'the more significant the designated heritage asset, the greater the presumption in favour of its

conservation should be'. Significance can be 'harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification.

- 5.16 Paragraph HE9.2 provides guidance for local planning authorities in instances where 'the application will lead to substantial harm to or total loss of significance' of a heritage asset or assets. It says that:

Where the application will lead to substantial harm to or total loss of significance local planning authorities should refuse consent unless it can be demonstrated that:

(i) the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss; or

(ii) (a) the nature of the heritage asset prevents all reasonable uses of the site; and

(b) no viable use of the heritage asset itself can be found in the medium term that will enable its conservation; and

(c) conservation through grant-funding or some form of charitable or public ownership is not possible; and

(d) the harm to or loss of the heritage asset is outweighed by the benefits of bringing the site back into use.

- 5.17 HE9.4 deals with 'a harmful impact on the significance of a designated heritage asset which is less than substantial harm', and says that local planning authorities should:

(i) weigh the public benefit of the proposal (for example, that it helps to secure the optimum viable use of the heritage asset in the interests of its long-term conservation) against the harm; and

(ii) recognise that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.

- 5.18 Paragraph 111 of the Guide sets out the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 that local planning authorities when making

decisions must 'have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses' and 'pay special attention to the desirability of preserving or enhancing the character or appearance' of a conservation area.

- 5.19 Policy HE10, 'Additional policy principles guiding the consideration of applications for development affecting the setting of a designated heritage asset' deals with the setting of the heritage assets and urges local planning authorities to not just protect the setting of heritage assets, but to use the opportunity to cause development 'to better reveal the significance of the asset'.

Camden Council's Unitary Development Plan

- 5.20 Policy B7 of the UDP deals with conservation areas, and says:

A - Character and appearance

The Council will only grant consent for development in a conservation area that preserves or enhances the special character or appearance of the area. The Council will not grant planning permission for development outside of a conservation area that it considers would cause harm to the conservation area's character, appearance or setting.

B - Demolition of unlisted buildings

The Council will not grant conservation area consent for the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area, unless exceptional circumstances are shown that outweigh the case for retention.

- 5.21 The commentary says that 'It is important that new buildings are designed taking into account the character and appearance of the conservation area they are in', and:
- When a building is considered to make little or no contribution to the character or appearance of a conservation area, the Council will assess the contribution*

made by any replacement building. The replacement building should enhance the conservation area to an appreciably greater extent than the existing building.

5.22 It also says that:

The architectural characteristics of a conservation area derive from, among other things, the detailing of existing buildings and the particular materials used in their construction. The Council will encourage the use of high quality and sustainable materials that complement and enhance the conservation area.

Guidance on urban design and the historic built environment

5.23 Section 7.4 of BS 7913:1998 'Guide to the principles of the conservation of historic buildings' says 'it is [also] frequently necessary for new buildings to be erected within historic settlements or conservation areas. In some circumstances, for example when there is an obvious or identifiable gap in a larger formal or informal composition, such new work may be positively desirable on broad architectural grounds; in other circumstances it is less desirable, but necessary'.

5.24 Paragraph 7.4.6 deals with 'criteria for new buildings in historic settings', and includes:

- Such buildings should be designed for a long life and soundly constructed of durable materials chosen to suit their context. They should be so planned that they are capable of alteration and adaptation in response to changing needs in the future.
- New buildings should be designed with due regard to their site and surroundings using materials that will weather and age well and settle into their place in the townscape.

5.25 The BS concludes this advice by saying: There can be no simple prescription for good architecture beyond the

Vitruvian precepts of 'commodity, firmness and delight'. Good new buildings in historic settings should not merely be fashionable or photogenic, but should stand the test of time. Mere conformity to restrictive formulae or the dressing of modern structures in traditional guises may fail to produce architecture of good repute'.

5.26 'By Design: Urban design in the planning system: towards better practice', produced by the Commission for Architecture and the Built Environment and the former DETR, provides guidance and recommendations regarding urban design.

5.27 The document deals in detail with how urban design can contribute to successful place-making, and the reinforcement of local character. It suffices here to list the 'Objectives of Urban Design' that it sets out:

- To promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture.
- To promote the continuity of street frontages and the enclosure of space by development which clearly defines private and public areas.
- To promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including disabled and elderly people.
- To promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport.
- To promote legibility through development that provides recognisable routes, intersections and landmarks to help people find their way around.
- To promote adaptability through development that can respond to changing social, technological and economic conditions.

- To promote diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs.

5.28 The English Heritage/CABE guidance 'Building in Context' gives guidance on the design of new development which affects the historic environment, and particularly conservation areas. It sets out good practice guidance on the design of new development in historic areas. The guidance explains the importance of basing designs on thorough analysis of the context, and warns against the application of simple formulae such as 'fitting in' or 'contrasting the new with the old'. It advises that successful projects will:

- Relate well to the geography and history of the place and the lie of the land;
- Sit happily in the pattern of existing development and routes through and around it;
- Respect important views;
- Respect the scale of neighbouring buildings;
- Use materials and building methods which are as high in quality as those used in existing buildings; and
- Create new views and juxtapositions that add to the variety and texture of the setting.

5.29 The guidance contains a number of case studies and draw a number of specific conclusions from them:

- The best buildings result from a creative dialogue between the architect, client, local planning authority and others; pre-application discussions are essential;

- The local planning authority and other consultees can insist on good architecture and help to achieve it;
- Difficult sites should generate good architecture, and are not an excuse for not achieving it;
- With skill and care, it is possible to accommodate large modern uses within the grain of historic settings;
- High environmental standards can help generate good architecture;
- Sensitivity to context and the use of traditional materials are not incompatible with contemporary architecture;
- Good design does not stop at the front door, but extends into public areas beyond the building;
- High-density housing does not necessarily involve building high or disrupting the urban grain and it can be commercially highly successful;
- Successful architecture can be produced either by following historic precedents closely, by adapting them or by contrasting with them;
- In a diverse context a contemporary building may be less visually intrusive than one making a failed attempt to follow historic precedents.

6.0 The effect of the proposed scheme

- 6.1 This section of the report analyses the proposed development and describes the range of benefits it provides. The purpose of this section is to demonstrate that the scheme will offer a benefit to offset any harm that may be felt to be caused to the conservation area by the loss of the existing buildings. By virtue of the quality of the design and the distinct economic and social outputs from the scheme, no harm is actually caused.
- 6.2 This section, therefore, provides the substantive basis for the argument in the next section of the report that, because it is positive in many respects, the scheme successfully achieves that balance sought by national and local policy guidance.

The design and how it responds to the Charlotte Conservation Area

- 6.3 The proposed building will replace the dilapidated and unremarkable existing buildings with a carefully designed new scheme that is clearly of its time, and will provide sensible, useable accommodation consistent with the land-use objectives of the Council. The proposed building echoes the variation in building form and fenestration of the existing buildings, and does not seek to impose a single architectural character across the width of the site.
- 6.4 The design is confidently contemporary, but is also contextual: it respects the scale of neighbouring properties by the articulation of the upper parts of the design.
- 6.5 The individuality and distinctiveness of the design is appropriate because of the character and appearance of this part of the Charlotte Street Conservation Area: because of the great variety of building style and appearance. The proposed development would be consistent with this character, and would take its place,

along with the 55 Tottenham Court Road, as a new element in the ongoing evolution of the area.

Listed buildings

- 6.6 There are a number of listed buildings in the vicinity, but the proposed development will not have a meaningful effect on their setting. The site can only be very obliquely seen with the Rising Sun pub (Grade II), and such is the variety of the Tottenham Court Road townscape that the degree of change in the street scene is very unlikely to make a significant difference to how it the listed building perceived. 2-8 Goodge Street (64 Tottenham Court Road), and 65 to 67 Tottenham Court Road are too far from the site for a new development to have any notable effect on their setting.

Sustainability and accessibility

- 6.7 The proposed building will inherently be more accessible. It will contain a lift to all floors and step-free floor plates. It will also, by being a new building built to current standards, be very significantly less demanding of resources than the existing building would be if it were refurbished. It will have green roofs and green walls.

Economic benefits

- 6.8 The economic benefits of the proposed scheme are clear: the proposed residential units would be attractive and bring more people to live in Tottenham Court Road. Its high street location, and proximity to Goodge Street and Tottenham Court Road Underground Stations, would give the building easy access to local businesses and to public transport.

7.0 Compliance with policy and guidance

Planning Policy Statement 5: Planning for the Historic Environment

Climate change: Policy HE1

- 7.1 The proposed development is an example of the balance sought by the new PPS (at HE1.3) in terms of sustainability, where it says that ‘the public benefit of mitigating the effects of climate change should be weighed against any harm to the significance of heritage assets’. The existing buildings are neither of such inherent heritage significance or notable value in terms of mitigating climate change that the value of their fabric in helping to achieve climate change should be seen as an obstacle to their removal
- 7.2 The proposed building will provide far more by way of climate change mitigation than the existing buildings. As pointed out in the previous section, it will be less demanding of resources than the existing building would be if it were refurbished, and will have green roofs and green walls. The design of the external envelope and building systems will also help the development achieve a high level of sustainability. The scheme is thus consistent with thrust of Policy HE1 of the PPS.

Local planning: Policy HE3

- 7.3 The scheme considers the surroundings of the site in a holistic fashion, and not in isolation. Considerable thought has been given to the proposed scheme in terms of views along north and south along Tottenham Court Road. For the reasons given in the previous section and in the architects’ Design & Access Statement, the scheme will enhance the character and appearance of the Charlotte Conservation Area and the context of other buildings nearby, including that of the listed Rising Sun public house.

- 7.4 In doing this the proposed scheme is both acknowledging the holistic approach of the PPS to the historic environment and helping to achieve those things that Policy HE3 seeks: that development is a ‘catalyst for regeneration in an area’, that the historic environment can be a ‘stimulus’ that can ‘inspire new development of imaginative and high quality design’, and the ‘the re-use of existing fabric, minimising waste’.

Policy guiding the determination of applications for consent relating to all heritage assets: Policy HE7

- 7.5 The proposed development is consistent with Policy HE7 of the PPS. It ‘take[s] into account the particular nature of the significance of the heritage asset[s, in its surroundings] and the value that [they] hold for this and future generations’. This is demonstrated by the careful and detailed examination of the architectural qualities of the proposed building. In doing this, the scheme undoubtedly succeeds in ‘sustaining and enhancing the significance of heritage assets’, and utilises ‘their positive role in place-shaping’. It also clearly makes a ‘positive contribution to the character and local distinctiveness of the historic environment’

- 7.6 The scheme also does the relevant things that the ‘Planning for the Historic Environment Practice Guide’ urges in its Paragraph 79. For the reasons explained earlier, the proposed development ‘makes a positive contribution to economic vitality and sustainable communities’, and ‘is an appropriate design for its context and makes a positive contribution to the appearance, character, quality and local distinctiveness of the historic environment’.

Additional policy principles relating to designated heritage assets: Policy HE9

- 7.7 In terms of Policy HE9, the proposed development very definitely conserves the heritage assets in its context. It certainly does not involve harm to those heritage assets of any kind.

- 7.8 In respect of the buildings that presently occupy the site of the proposed development, Section 3 of this report argues the contribution that 51-52 Tottenham Court Road make to the Charlotte Street Conservation Area is very limited. When measured against Appendix 2 of English Heritage's 'Guidance on Conservation Area Appraisals', the buildings struggle to show themselves as 'contributors' to the conservation area.
- 7.9 The key aspect of Policy HE9.2 that should be applied to these proposals is HE9.2(i): if, as the Council maintains, 51-52 Tottenham Court Road make a 'positive contribution' to the character and appearance of the Charlotte Street Conservation Area, then the 'substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss'.
- 7.10 Policy HE9.2 says that, if HE9.2(i) does not apply, then the proposed development should be measured against the four tests in HE9.2(ii). These are set out in Section 5. The proposed scheme for 51-52 Tottenham Court Road can be seen as acceptable when considered against the tests – when taken together and when the scheme is assessed in a reasonable fashion against them.
- 7.11 While the 'the nature of the heritage asset' does not necessarily prevent 'all reasonable uses of the site', it certainly limits the range of possible uses and thus the economic and sustainability potential of the site. It is the case that a 'viable use of the heritage asset itself can be found in the medium term', but not one that will financially or practically 'enable its conservation' in any meaningful way – even if that were justified by the marginal significance of the buildings. 'Conservation through grant-funding or some form of charitable or public ownership' is most certainly *not* possible, but the perceived 'harm to or loss of the heritage asset' is certainly - for the reasons provided here, earlier and in the Design & Access Statement - 'outweighed by the benefits of bringing the site back into use'.

Additional policy principles relating to the setting of designated heritage assets: Policy HE10

- 7.12 For these inter-linked reasons, the proposed development is thus also entirely consistent with Policy HE10 regarding the effect of development on the setting of designated heritage assets. The careful design of the new building has been undertaken with a respectful consideration of the setting of the listed building and the character and appearance of the conservation area, and is a clear example of how new development can ‘better reveal the significance of the asset’.

Camden’s Unitary Development Plan

- 7.13 As has been shown, the scheme would:
- Not remove from the conservation area a building that is indispensable in terms of its character and appearance. 51-52 Tottenham Court Road do not make such a contribution to the conservation area that their replacement cannot be contemplated;
 - Would provide a new building that would preserve and enhance the character and appearance of the conservation area.
- 7.14 For these reasons, and those given earlier, the proposed development is consistent with Camden’s UDP Policy B7 regarding demolition and new development in conservation areas.

Guidance

- 7.15 The proposed development is exactly what BS 7913:1998 ‘Guide to the principles of the conservation of historic buildings’ seeks – it would be ‘designed for a long life and soundly constructed of durable materials chosen to suit their context’. The careful scaling of the building and the composition of the frontage to Tottenham Court Road demonstrates how the proposed scheme will have ‘due regard to [its] site and surroundings using materials that

will weather and age well and settle into [its] place in the townscape ‘.

- 7.16 The proposed scheme is also consistent with the spirit and detailed guidance of ‘By Design’. In its design it will be seen to be visibly ‘responding to and reinforcing locally distinctive patterns of development, landscape and culture’. It will ‘promote the continuity of street frontages and the enclosure of space by development which clearly defines private and public areas’. The new arched entrance will ‘promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society’ and ‘promote accessibility and local permeability by making places that connect with each other and are easy to move through’.
- 7.17 Finally, the proposed scheme exemplifies all that ‘Building in Context’ seeks to achieve. The scheme will undoubtedly ‘sit happily in the pattern of existing development and routes through and around it’ and ‘respect the scale of neighbouring buildings’. It will certainly ‘use materials and building methods which are as high in quality as those used in existing buildings’.
- 7.18 The proposed development would very much demonstrate a key point of ‘Building in Context’ - ‘in a diverse context a contemporary building may be less visually intrusive than one making a failed attempt to follow historic precedents. This is particularly apposite given the immediate context of the site.

Appendix A: Location



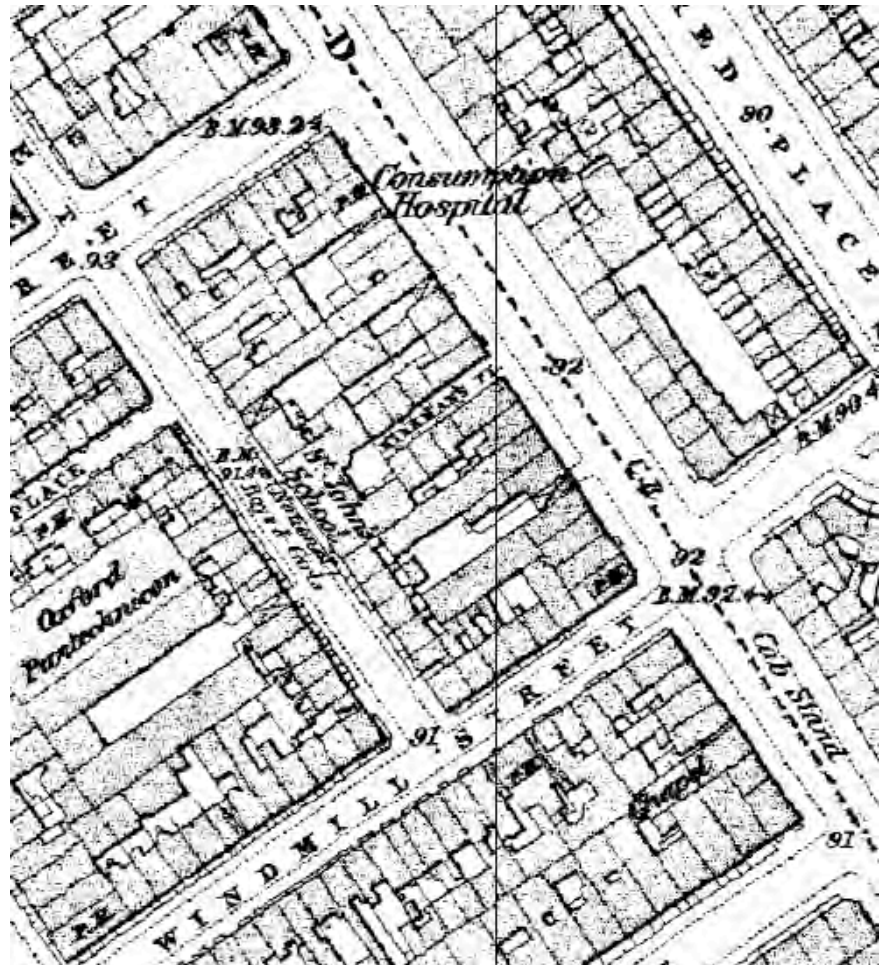
Current Ordnance Survey (not to scale)



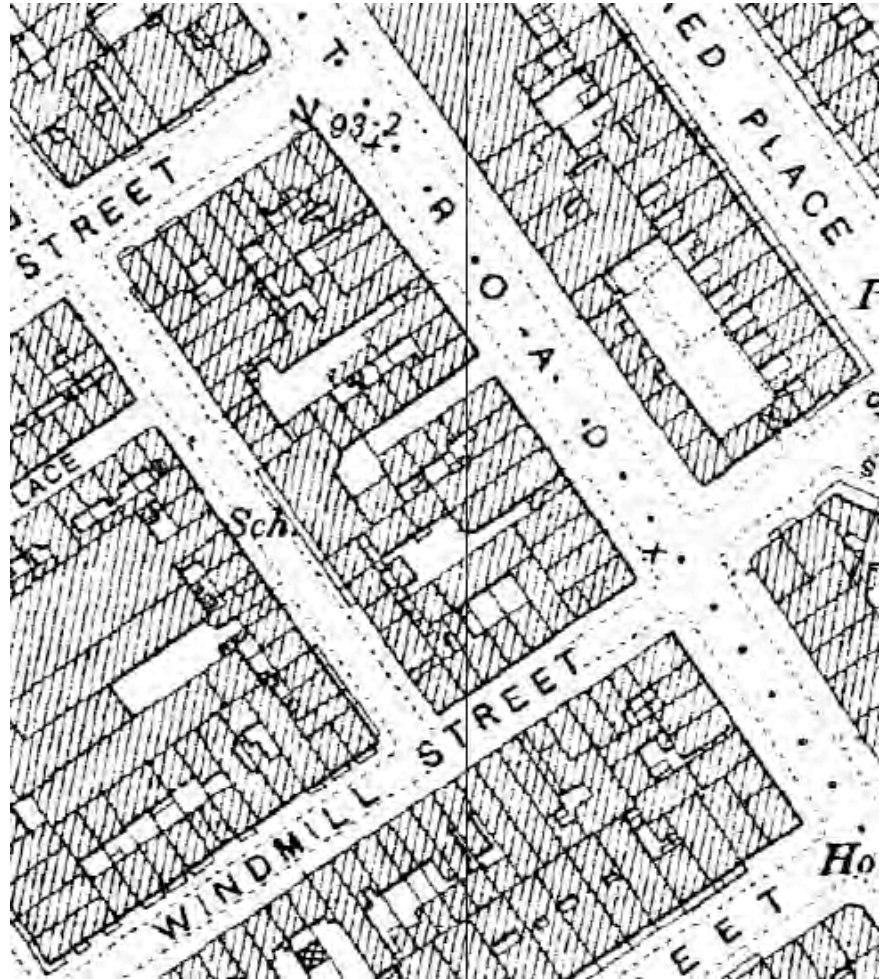
Aerial photograph (not to scale)

Appendix B: Historic maps

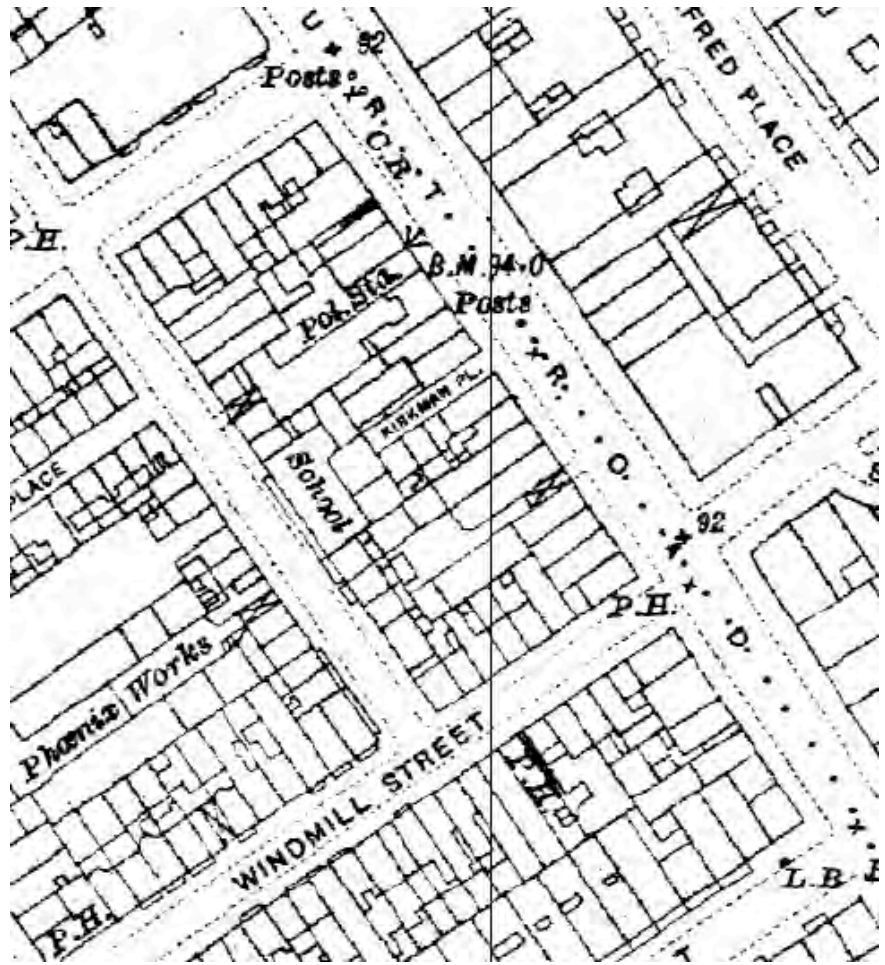
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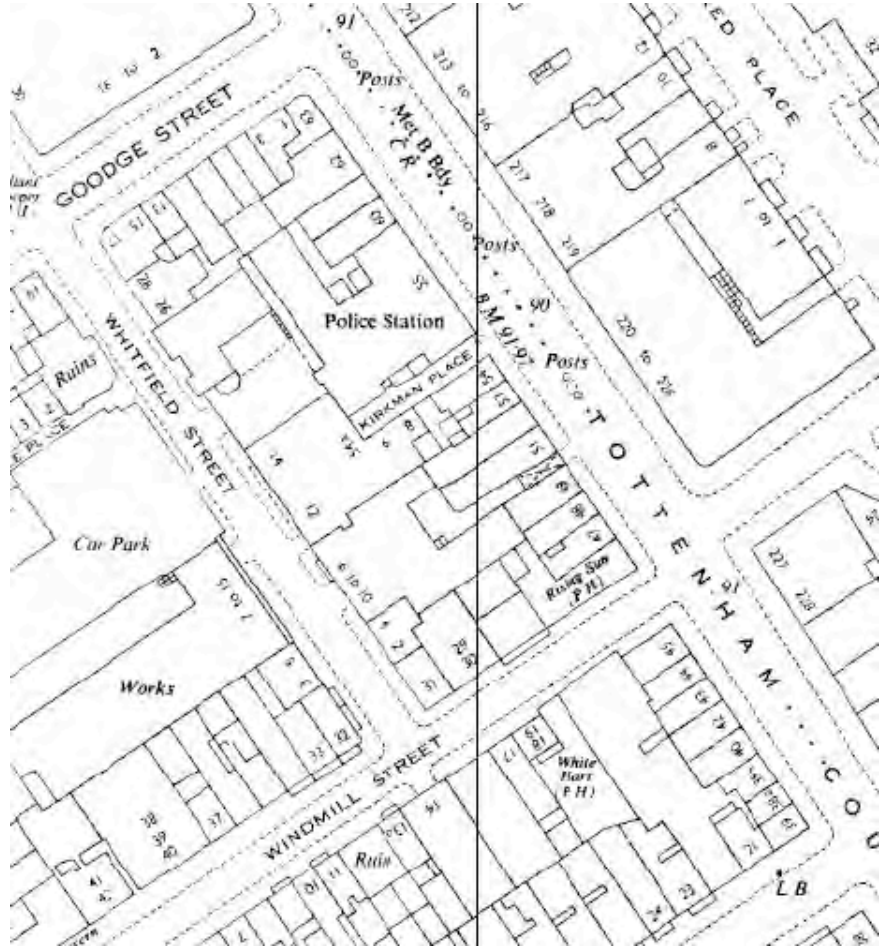
1875-76



1896



1916



1958-66

Appendix C: Photographs









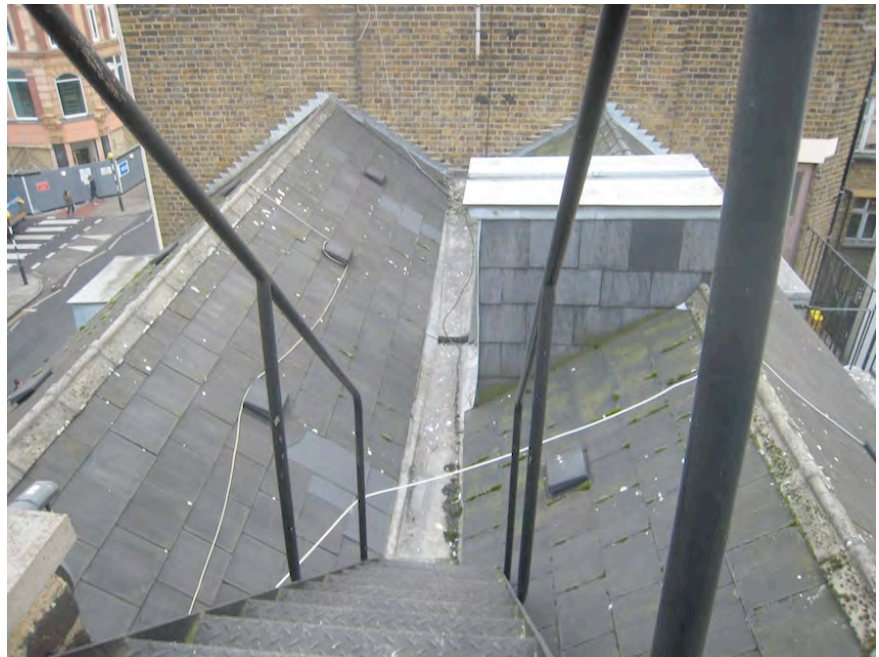














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