



PURCELL

22 TOWER STREET

HERITAGE IMPACT ASSESSMENT

May 2014



KATHARINE BARBER AND MIRIAM HOLLAND

On behalf of Purcell ®

15 Bermondsey Square, Tower Bridge Road, London SE1 3UN

katharine.barber@purcelluk.com

www.purcelluk.com

All rights in this work are reserved. No part of this work may be reproduced, stored or transmitted in any form or by any means (including without limitation by photocopying or placing on a website) without the prior permission in writing of Purcell except in accordance with the provisions of the Copyright, Designs and Patents Act 1988. Applications for permission to reproduce any part of this work should be addressed to Purcell at info@purcelluk.com.

Undertaking any unauthorised act in relation to this work may result in a civil claim for damages and/or criminal prosecution. Any materials used in this work which are subject to third party copyright have been reproduced under licence from the copyright owner except in the case of works of unknown authorship as defined by the Copyright, Designs and Patents Act 1988. Any person wishing to assert rights in relation to works which have been reproduced as works of unknown authorship should contact Purcell at info@purcelluk.com.

Purcell asserts its moral rights to be identified as the author of this work under the Copyright, Designs and Patents Act 1988.

Purcell® is the trading name of Purcell Miller-Tritton LLP.

© Purcell 2014

DOCUMENT ISSUE

ISSUE 1 (MAY 2014) - LEITH PUBLISHING



MJH/lkc/235473

CONTENTS

1	INTRODUCTION	4	4	HERITAGE IMPACT ASSESSMENT	48
1.1	Reasons for the Study	4	4.1	Introduction	48
1.2	Scope of Study	5	4.2	Outline of Development Proposals	49
1.3	Existing Information	5	4.3	Assessment Criteria	61
1.4	Statutory Legislation and Guidance	5	4.4	Impact Assessment	62
2	UNDERSTANDING	8	5	CONCLUSION	66
2.1	Ownership, Location and Setting	8			
2.2	Designations	10			
2.3	Historic Overview	14			
2.4	Late 20th Century Planning History	23			
2.5	Site Assessment	23			
3	SIGNIFICANCE	38			
3.1	Assessment of Significance	38			
3.2	Evidential Value	38			
3.3	Historical Value	39			
3.4	Aesthetic Value	39			
				APPENDICES	
				APPENDIX A: BIBLIOGRAPHY	67
				APPENDIX B: LISTING DESCRIPTION	70
				APPENDIX C: RESPONSE TO PRE-APPLICATION ENQUIRY	72

INTRODUCTION

1.1 REASONS FOR THE STUDY

22 Tower Street (hereafter the site) is located on the east side of the street in the Seven Dials area of Covent Garden and the Borough of Camden. The building is statutorily protected as a Listed Building (Grade II, Listed Building No: 1379048), and is also located within the Seven Dials Conservation Area.

This report is prepared to provide an understanding of the heritage significance of 22 Tower Street and an assessment of the impact of the development proposals on the heritage significance, fabric and context of the Listed Building. Planning permission is currently being sought for the conversion of the building into self-contained flats. Originally built as a school and most recently in use as

offices, current plans propose to reorganise the internal layout of the structure into self-contained dwelling units. The building has already been significantly and unsympathetically altered in previous conversion to office use, and very few traces of original fabric and layout remain internally. Not only has the space been divided up, but an entire floor has also been removed, and two new floors inserted in its place.

The changes and alterations the site has previously been subject to will be detailed in this report, in order for a full assessment of the site's heritage significance to be made. Relevant information relating to the site's setting and surrounding structures will also be provided for context. This report has been written to information and policies detailed in *The National Planning Policy (NPPF)*.



1.2 SCOPE OF STUDY

This document specifically addresses the heritage significance and impact of the proposals at 22 Tower Street. The study area comprises this structure and its surrounding area, including other Listed Buildings within the vicinity.

The study will first look at relevant information required to understand the development and history of the site. This includes a site description, assessment of relevant statutory legislation and the use and chronological history of the building.

The provision of baseline information will provide an understanding of the site, informing an assessment of significance. The document will finally draw conclusions as to the level of impact the proposed developments will have in regard to the heritage merit of the building, conservation area, streetscape and wider setting.

1.3 EXISTING INFORMATION

A desk-based study was undertaken to provide baseline information for this report. This involved consulting archives, documentary resources and online databases, which are referenced throughout the document. A number of original plans of the building were located during the course of the research, although these were not complete. Any gaps in understanding were addressed through visual site inspection which aimed to enhance understanding of the construction and evolution of the building in absence of historic building plans.

Archives consulted for this document include:

- The London Metropolitan Archives
- Borough of Camden Planning Department
- Camden Local Studies and Archives Centre
- The Royal Institute of British Architects Archives

An exterior and interior inspection of the building was undertaken on the 19th March 2014. The site inspection intended to assess the existing form of the building and identify any features of heritage merit. Particular attention was focussed on understanding the internal alterations and structural changes which had been undertaken on the property in previous years.

A full list of sources consulted for this study can be found in the Bibliography.

1.4 STATUTORY LEGISLATION AND GUIDANCE

1.4.1 LEGISLATION

National Planning Policy Framework

The National Planning Policy Framework (NPPF, published March 27th 2012) is the overarching planning policy document for England. Within Section 12: Conservation and enhancing the historic environment are the government's policies for the protection of heritage. The policies advise on a holistic approach to planning and development, where all significant elements which make up the historic environment are termed 'heritage assets'. These consist of designated assets (such as listed buildings or conservation

areas) non designated assets (such as locally listed buildings) or any other features which are considered to be of heritage value. The policies within the document emphasise the need for assessing the significance of heritage assets and their setting in order to fully understand the historic environment and inform suitable design proposals for change to significant buildings. The policies in this chapter require proposals to take into account:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them into viable uses consistent with their conservation
- The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.
- The desirability of new development making a positive contribution to local character and distinctiveness
- Opportunities to draw on the contribution made by the historic environment to the character of a place¹

The document also requires that the significance of any heritage assets affected by development proposals is understood and the impact of those proposals assessed.

1.4.2 POLICY

The Spatial Development Strategy for Greater London (The London Plan), 2011

The London Plan¹ is the strategic plan for London, and it sets out an economic,

environmental, transport and social framework for the development of the capital to 2031. The London Plan, together with each of the London Boroughs' own local policies, forms part of the development plan for determining planning applications in London. London boroughs' local policies must be in general conformity with the London Plan. Key policies to be considered in the context of the Site include:

- Policy 7.6 Architecture: Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- Policy 7.8 Heritage Assets and Archaeology: London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

Development should incorporate measures that identify record, interpret, protect and, where appropriate, present the site's archaeology.

¹ NPPF, 2012, p.30

- Policy 7.9 Heritage Led Regeneration: Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration.

The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

- Policy 7.10 World Heritage Sites: Development in World Heritage Sites and their settings, including any buffer zones, should conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance and Outstanding Universal Value. Development should not cause adverse impacts on World Heritage Sites or their settings (including any buffer zone).

Revised Early Minor Alterations to the London Plan, 2013

The revised Early Minor Alterations to the London Plan² include an update to Policy 7.8 Heritage Assets and Archaeology; amendments are limited to pre-existing paragraph 7.31 which set out policy relating to the setting of conservation areas and sustainable development.

The paragraphs below are introduced in the revised alterations and are pertinent to the Site. Introduced paragraphs reflect an emphasis on weighing up 'less than substantial harm' in heritage terms against public benefit and assessing heritage assets in a deteriorated state. Paragraph 7.31A states:

'Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies'.

Paragraph 7.31B:

'Where there is evidence of deliberate neglect of and or damage to a heritage asset the

deteriorated state of that asset should not be taken into account when making a decision on a development proposal'.

Draft Further Alterations London Plan, January 2014

There are no material changes to policies on built heritage in the draft further alterations over those considered above.

Supplementary Planning Guidance

The Supplementary planning guidance (SPG) on Sustainable Design & Construction (April 2014), addresses the implementation of London Plan policy 5.3 and matters relating to environmental sustainability. There is no information within this document relating to heritage.

1.4.3 LOCAL POLICY

London Borough of Camden Local Development Framework

The Borough of Camden's LDF was adopted in 2010. Development should normally be in line with policies in the LDF. Policy DP25 of the Development Policy Document (DPD) contains policies relevant to the historic environment. Camden Local Development Policies 2010-2025

DP25 – Conserving Camden's heritage – Camden Development Policies 2010-2025 Conservation areas

In order to maintain the character of Camden's conservation areas, the Council will:

a) take account of conservation area statements, appraisals and management plans when

assessing applications within conservation areas; b) only permit development within conservation areas that preserves and enhances the character and appearance of the area; c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention; d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

Listed buildings

To preserve or enhance the borough's listed buildings, the Council will:

e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention; f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and g) not permit development that it considers would cause harm to the setting of a listed building

1.4.4 HERITAGE GUIDANCE

Conservation Principles: English Heritage Guidance 2008

Conservation Principles provides a comprehensive framework for the sustainable management of the historic environment, wherein 'Conservation' is defined as the process of managing change to a significant place and its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations. The guidance also provides a set of four heritage values, which will be used to assess significance within this document. These values may be understood as follows:

Evidential value: the potential of a place to yield evidence about past human activity.

- Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.
- Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place.
- Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

The Setting of Heritage Assets: English Heritage Guidance 2011

The Significance of a heritage asset not only derives from its physical presence but also from its setting and the surroundings in which it is experienced. The Setting of Heritage Assets provides guidance on managing change within the setting of a heritage asset.

Conservation Area Guidance

The site lies within the Seven Dials Conservation Area which is covered within the Seven Dials Estate Conservation Area Appraisal and Management Strategy. This includes the Seven Dials Conservation Area Statement which was adapted in 1998. The statement defines and analyses what makes the Conservation Area 'Special' and provides information on the types of alterations and development that are likely to be acceptable or unacceptable in the Conservation Area.

2

UNDERSTANDING

2.1 OWNERSHIP, LOCATION AND SETTING

22 Tower Street is situated in a heavily urbanised environment of mixed-use buildings of varying age, type and scale. The area surrounding the site is not dominated by one particular building type or style, but is instead characterised by their variety.

No.22 Tower Street and Nos. 4-10 opposite are sizable structures and dominate the streetscape – their neighbouring buildings are on a significantly smaller scale.



- 1 South elevation fronting Tower Court
- 2 Rear (east) elevation facing the edge of Tower Court
- 3 Main (west) elevation of No.22 fronting onto Tower Street
- 4 Upper stories of the main elevation fronting Tower Street

In contrast, Tower Court is a much smaller pedestrianized street running diagonally behind No.22, between Tower Street and Earlham Street. The buildings in Tower Court are of a significantly smaller scale and height than those in the surrounding streets, and contain a terrace of attractive late 18th century houses which are Listed (Grade II) for their group value.



- 1 Late 18th century houses fronting Tower Court – 22 Tower Street to the right of the image.
- 2 22 Tower Street, main frontage.
- 3 Looking south long Tower Court – the rear of No.22 obscured behind bushes on the right.
- 4 View along Tower Street – No.22 and Nos. 4-10 directly opposite.

2.2 DESIGNATIONS

Listed Buildings

22 Tower Street is protected by Grade II Listed Building status which offers protection under policies in the NPPF and the *Planning (Listed Buildings and Conservation Areas) Act 1990*. Buildings are listed because of their special architectural and historic interest, which through designation is considered to be important in national terms.

Alterations, extensions or demolitions of listed buildings need to gain Listed Building Consent from the local planning authority, and in certain cases English Heritage, before they can proceed. The list descriptions for key buildings potentially affected by the application are detailed below:

22 Tower Street (Listed Building no. 1379048)

Grade II listed board school c.1874 and altered late 20th century. Constructed of yellow stock brick with red brick and stone dressings. Steep slated roofs with gabled end bays, tall brick chimney-stacks and parapets. The building is mainly four storeys, and consists of a not quite symmetrical composition of 2:1:3:1:2 windows with projecting end bays. There is a five storey bell tower bay to the left of the entrance, and the central 3 bays are divided by pilasters supporting a parapet of blind panels. The third and fourth floors of the central bay are set back with a late 20th century glazed wall and curved roof below original lunettes. The

main central entrance has a stucco doorcase of paired banded pilasters, carrying an entablature and a scrolled pediment with ball finial. Most windows are round-arched with keystones, and those flanking the overdoor have gauged brick flat arches. To the left of the chimney and at third floor height, there is a carved stone plaque depicting an angel showing a book to two young children.

5 – 8 Tower Court

Grade II listed 5-8 Tower Court lies close to the east of the proposal site. They are a row of late 18th century terraced houses with shops, altered in the 19th and 20th centuries. Built of yellow stock brick with a stucco sill band at 1st floor level, they have mansard roofs with dormers. 3 storey with basements and attics, and 2 windows each. The shop fronts are wooden with bracketed entablatures and inswapt friezes. The shop windows are altered for domestic occupation.

10 Tower Court

Situated to the north-east of the proposal site, 10 Tower Court is a Grade II listed building which once formed a terrace with numbers 5-8 Tower Court. It is a late 18th century structure altered in the mid-19th and 20th centuries. Like its neighbouring properties, it is of yellow stock brick with a stucco ground floor and 1st floor sill band, under a slated mansard roof with dormers. The structure is of 3 storeys with basement and attic, and originally had a shopfront, which was lost post-1973.

22 Earlham Street

22 Earlham Street is Grade II listed and lies to the north of the proposal site. It is a late 18th century terraced house of multi-coloured stock brick. It has a tiled mansard roof with dormers, and is of 3 storeys and basement. The shop window and doorway have been altered.

24 – 26 Earlham Street

This Grade II listed terrace is situated to the north of the proposal site. It was constructed in the early 19th century and altered in the mid-19th century. The terrace is built of multi-coloured stock brick, and number 26 is painted. It features a slate mansard roof with dormers and 20th century shopfronts. No. 24 has a stucco cornice inscribed 'R PORTWINE' and an original lead rainwater head.

FW Collins & Son, 14 Earlham Street

The grade II listed premises of FW Collins & Son lies close to the north-west of the proposal site. Constructed c.1835 of yellow stock brick and red brick dressings, the building comprises a timber shop-front with central entrance with a panelled, part-glazed door and overlight. There is a slightly recessed house entrance to the left featuring a panelled door and overlight. Between the 1st floor windows is a round-arched enamelled sign inscribed "Established 1835/F. W. Collins/Elastic Glue Manufacturer (Sole Inventor 1857)/Leather, Grindery & General Ironmonger/Warehouse".

Ambassadors Theatre, West Street

The Grade II listed Ambassadors Theatre sits on West Street, with its rear elevation looking onto Tower Street, opposite the frontage of 22 Tower Street. Built 1913 and designed by renowned theatre architect WGR Sprague. The structure is a low elevation of 3 storeys and 4 bays, and the ground floor entrances have a continuous canopy.

These Listed Buildings are mapped relative to the site on the designations plan overleaf.

Conservation Areas

The site lies within the Seven Dials Conservation Area, which was designated in 1971 and extended in 1974, 1991 and 1998. The Conservation Area is covered by the Seven Dials Estate Conservation Area Appraisal and Management Strategy.

The Conservation Area takes in the area focussed on Seven Dials and can be separated into three sub-areas. One of these is centred on Seven Dials itself, the second incorporates the area of the Freemasons Hall and Great Queen Street, and the third stretches north-east and takes in Macklin Street.

Our site is located within the first of these sub-areas – the earliest part of the Conservation Area to be designated – that of Seven Dials. The distinctive layout around Seven Dials was the result of an ambitious building plan devised by Thomas Neale, who was a property speculator and Master of the Mint during the latter part of the 17th century. Neale was responsible for what was the only 17th and 18th century development within the West End that departed from a standard grid pattern. Instead, the streets radiate from a small central circus. Tower Street itself is a relic of an earlier street layout – originally laid out in the early 17th century, it was later incorporated into Thomas Neale's radiating plan.

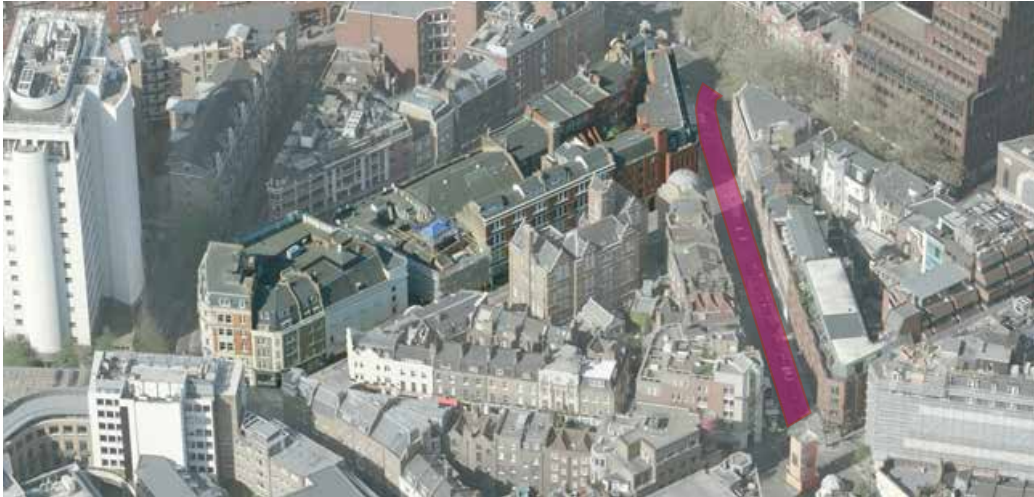
This south-western part of the Conservation Area is characterised by this unusual layout and a mixture of mid-height buildings of varying use and occupation. The Conservation Area as a whole contains a large number of Grade II and Grade II* Listed Buildings. There are also many structures which are not statutorily protected, but which are considered notable for the positive contribution they make to the area. Amongst these are 4-10 Tower Street, directly opposite our site, and 9 Tower Court, to its east.



Designations Plan

- 22 Tower Street
- Listed Buildings
- Conservation Area

The images on the following pages are included to give an overall feel of the Site context and surrounding streetscape. The photographs are taken from the Design and Access Statement for the application prepared by Claridge Architects'



Aerial view with Earlham Street shaded pink.



View from the upper level of the building looking at the rear of the buildings on Earlham Street.



Office Building _ Built in 1980.



View from the upper level of the building showing one of the terraced buildings on Tower Court, highlighting the character of the Victorian street with its original street lamp.



Aerial view with buildings on Earlham Street highlighted.



View of the rear extension looking towards Tower Court.



View out from the garden. Buildings on Monmouth Street can be seen down the alley



View of Victorian terraced dwelling on Tower Court
Site map number _9 & _10



View of the rear of Earlham Street from the upper level of the building



Office Building _ Built in 1980.



View of adjacent building, also on the junction of Tower Street and Tower Court



View from the garden of the Victorian terraced buildings on Tower Court

2.3 HISTORIC OVERVIEW

Seven Dials – Early History

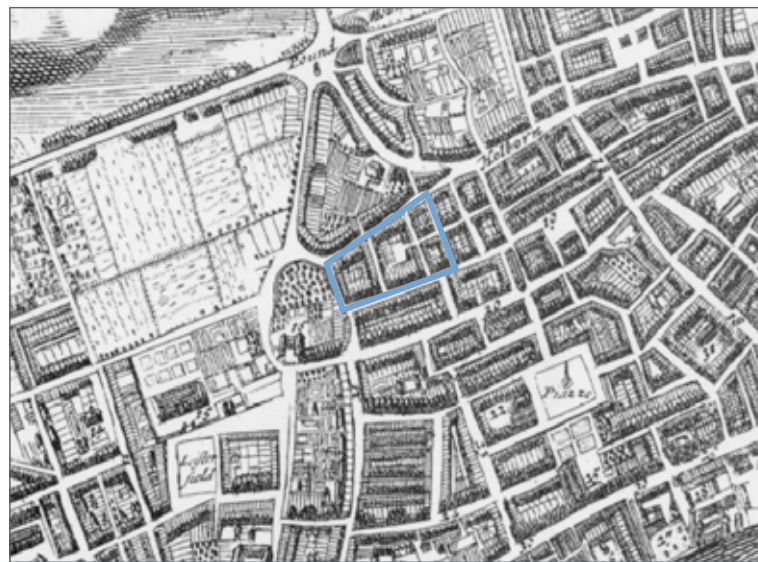
By the 10th century the area which was later to become Seven Dials – situated north of the Strand and South of Holborn – had become part of the estates of Westminster Abbey. By the 12th century, the land was owned by the Hospital of St Giles, a leper hospital which had been founded in 1117. Lepers continued to be cared for at St Giles until the mid-16th century, when the disease began to abate.

A map of c.1572 shows St Giles – by now acting only as a parish church - with the phrase 'in the fields' added to its name. The land which was later to be developed into Seven Dials is seen directly to the south east. At this time the area had not yet been built upon, and was known locally as 'Cock and Pye Fields', after a public house on the site, or as 'Marshland'. Houses began to be built on the site after the Great Fire of 1666, but the area was not fully developed until 1693.

Hollar's map of 1658 gives us some idea of the layout of the area just prior the Great Fire. St Giles' Fields is clearly marked out, with its boundary forming a similar layout to the area of Seven Dials which was built upon it a few years later. The map dating from 1690 to the right suggests that the site of the Seven Dials had been built upon between 1658 and 1690.



Londonium Feracissimi Angliae, c.1572 showing approximate site location



Londini Angliae Regni Metropolis, c.1690



Hollar's 'Great Map of London', c.1658

 Location of Seven Dials and later Tower Street

The Development of Seven Dials

The area was developed into what is now known as Seven Dials by Thomas Neale. Neale was allowed to purchase the freehold of the land known as 'Cock and Pye Fields' in return for raising money for the crown. In addition to this, Neale had to purchase the remainder of the lease for £4000, and continue to pay annual ground rent of £800. This was obviously a substantial financial commitment, and it influenced Neale to settle upon a street layout which had the potential to maximise his profits. The imaginative solution was the unique layout of Seven Dials – in using a star-shaped plan with radiating streets, the number of houses which could be built on the site was dramatically increased.

A map of London dated 1769 shows Seven Dials and Tower Street in-situ. Neale's development created mainly domestic terraced buildings, of which a few have survived. In areas where these properties have been demolished, the plot-width, scale and depth of the original buildings are still evident. Thomas Neale also imposed building agreements on the leases that he granted, which specified construction materials and the size of houses which could be built.



John Rocques 'Plan of London', c.1769



Seven Dials - 19th Century to Today

By the middle of 18th century the area had begun to decline, and by the 19th century the character of Seven Dials had changed significantly. The area had become part of the rookery of St Giles – one of the most notorious slums in Britain. Overcrowded and semi-derelict, the buildings became divided up – often with many families sharing a single room. A map of 1862-72 shows Tower Street before the school was built – in its place stood a number of terraced buildings, although from the map alone we are unable to tell whether they were in use as dwellings or otherwise.



1862-72 Ordnance Survey Map showing the site of No. 22 before it was built

It was shortly afterwards in 1874 that the current building on the site, the Tower Street Board School, was constructed. The school was set up by the London School Board – a local government institution set up in 1870 to build and run schools where there were insufficient places within voluntary establishments. The LSB, and the policies and infrastructure it developed, were an influential force on London schooling long after the body was abolished in 1904.

A set of elevations and cross sections detailing the proposed building were found at the Camden Local Studies Centre. These plans are undated but are believed to show the proposed build c. 1870 and reflect the original intended appearance of the elevations prior to the intervention of conservatories and the reconfiguration of the floor levels.

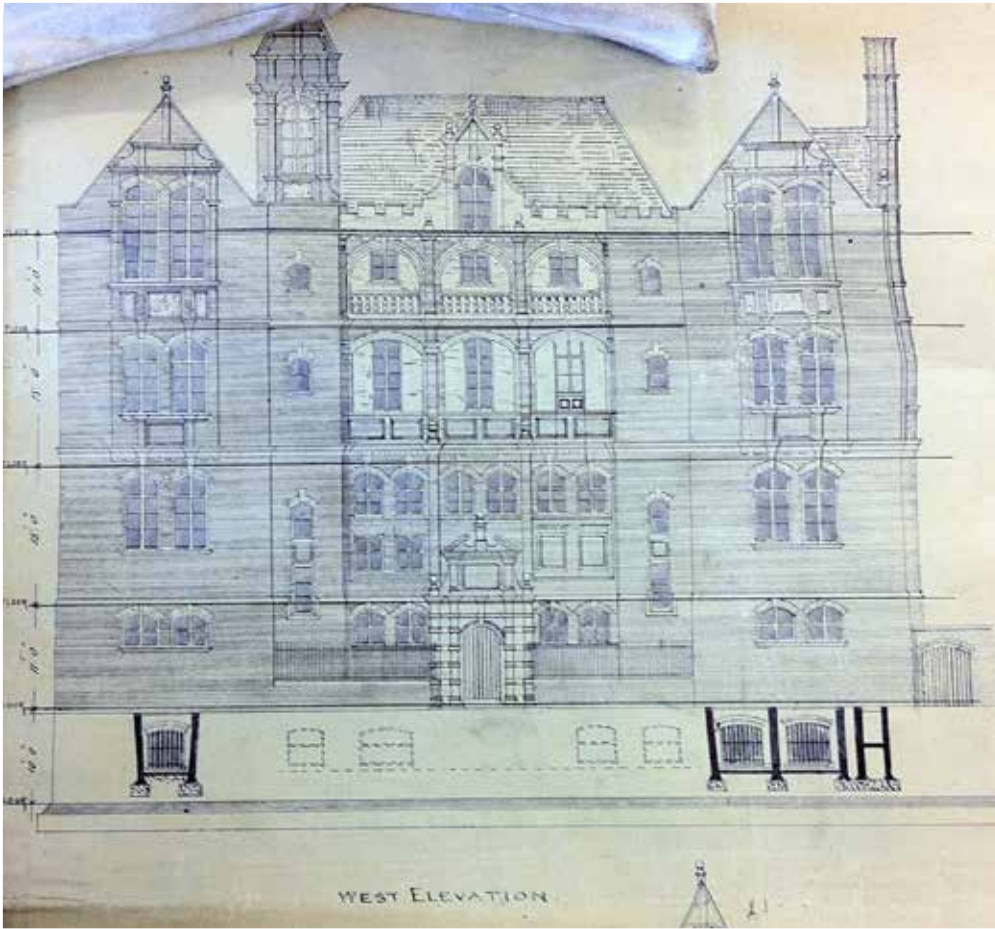


Second-hand clothes sellers close to Tower Street in Lumber Court (later Tower Court), c.1877

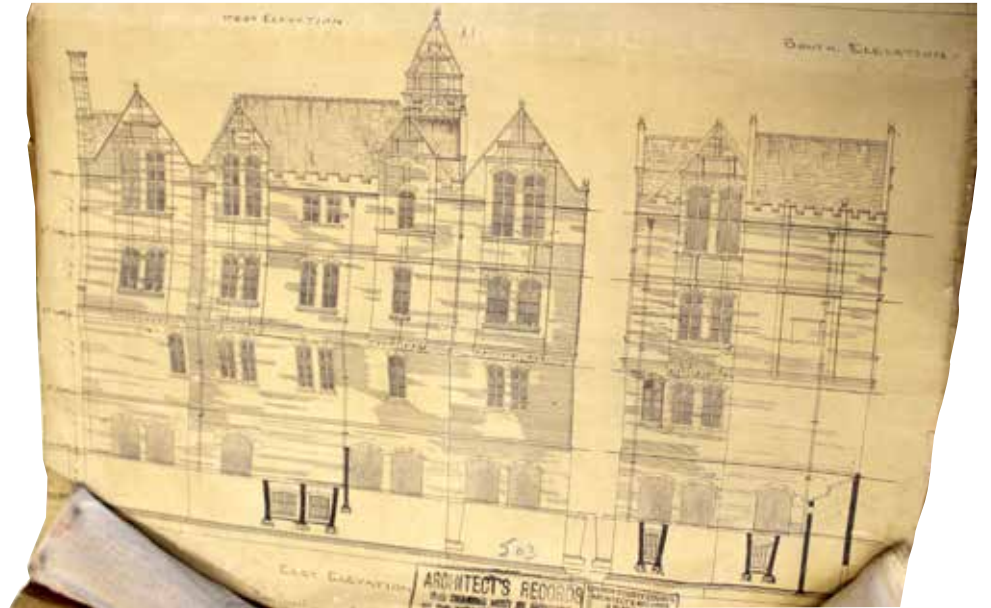
copyright pending

NEW YEAR'S DAY IN SEVEN DIALS.—In this poor and populous district, on Tuesday, 267 boys were provided with a hot dinner of substantial Christmas fare in the Tower-street Board School, and it is needless to say they did the meal ample justice. In many cases their under-size, their pinched and old-looking faces, and generally wretched condition, would favour the suggestion that their digestive organs have often little to do. This is the fifth year that the master of the school has, by the help of many friends, been enabled to provide for his scholars a supply of some of the good things of the season. This year a lady, prominent on the stage, contributed largely to the fund. The proceedings opened with the singing of a Christmas hymn. Hearty cheers were given for the donors of the feast, the teachers of the school, and the visitors. A magic lantern entertainment brought a happy New Year's Day to a conclusion.

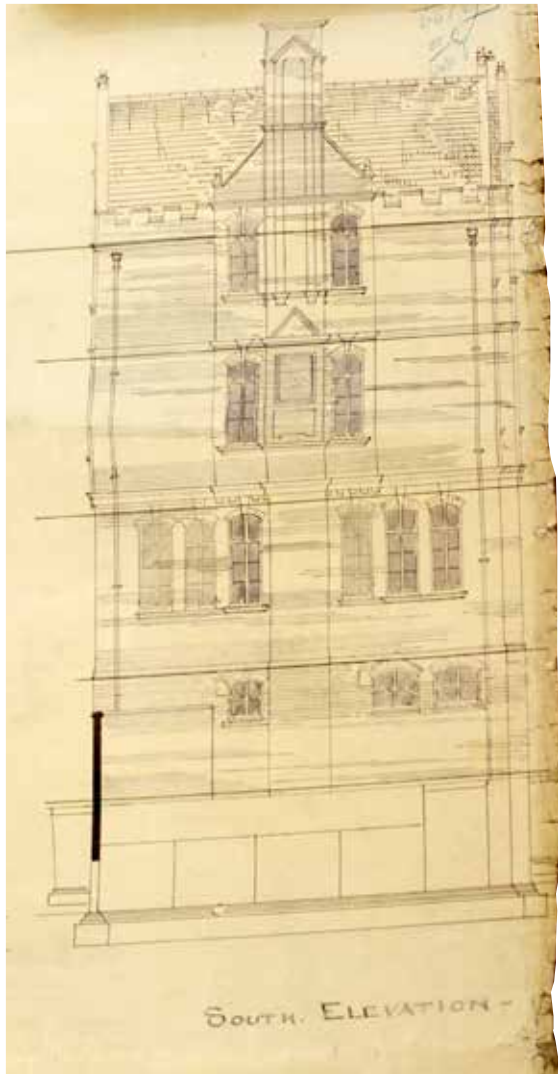
Cutting from the London Standard, Thursday 3rd January, 1884.



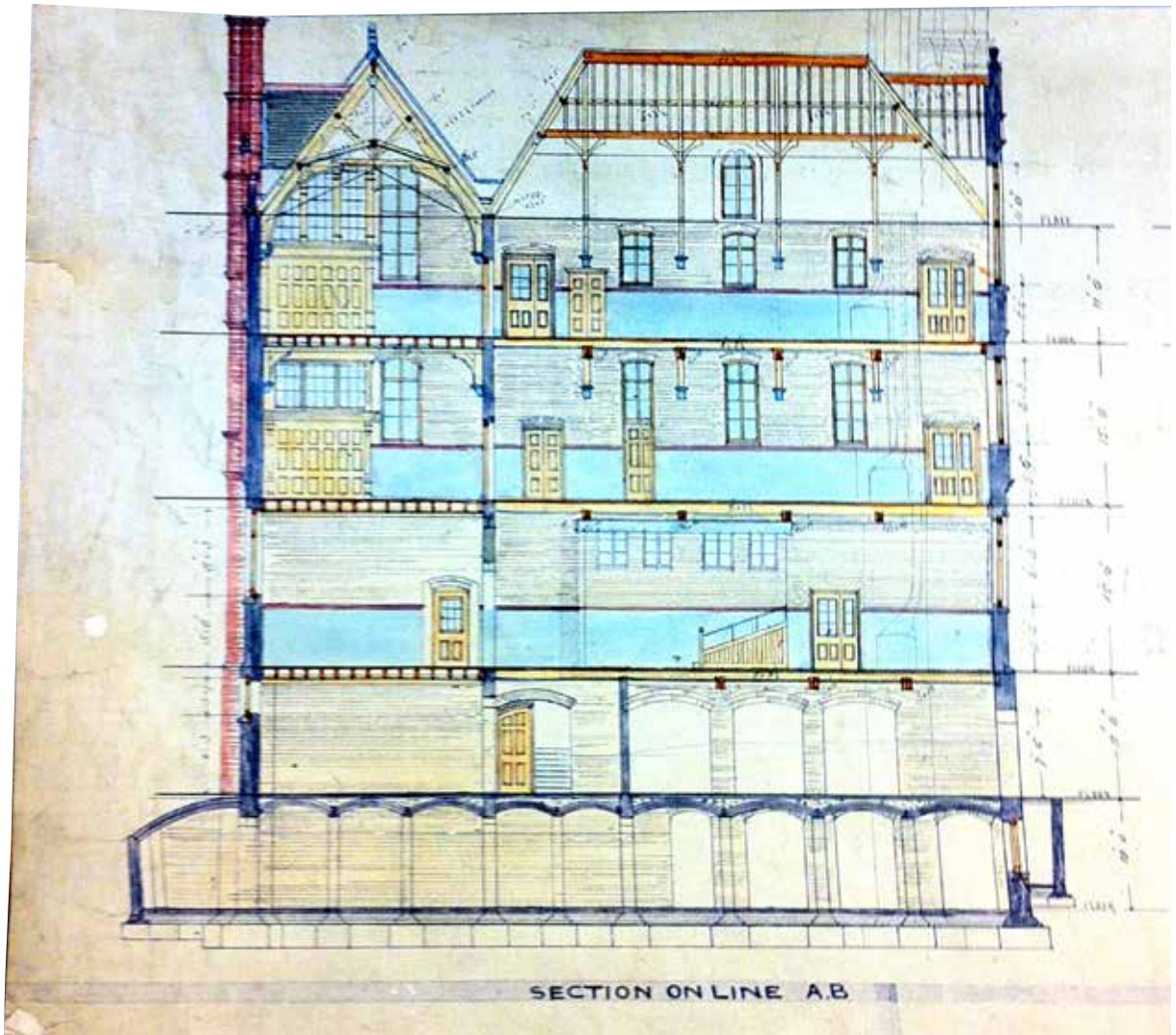
South-West Elevation, c.1870



North-East and North-West elevations, c.1870

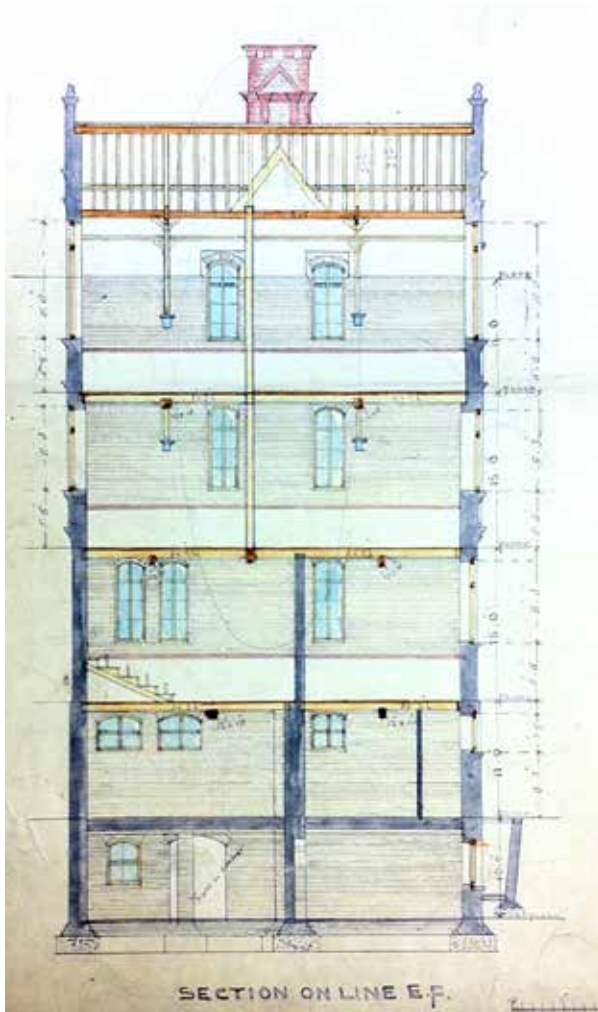


South-West Elevation, c.1870

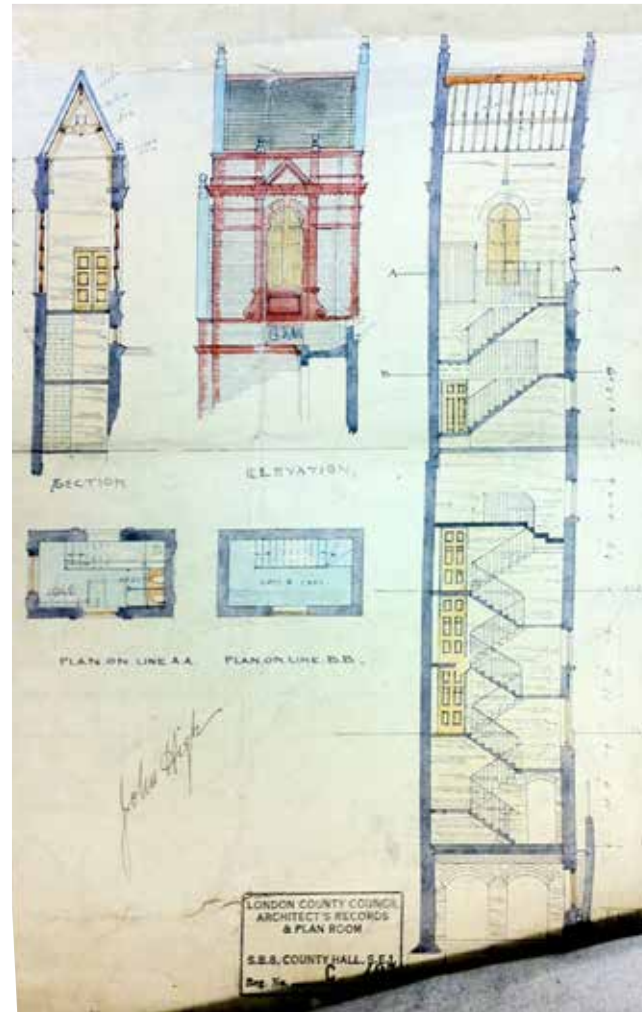


Cross Section, c.1870

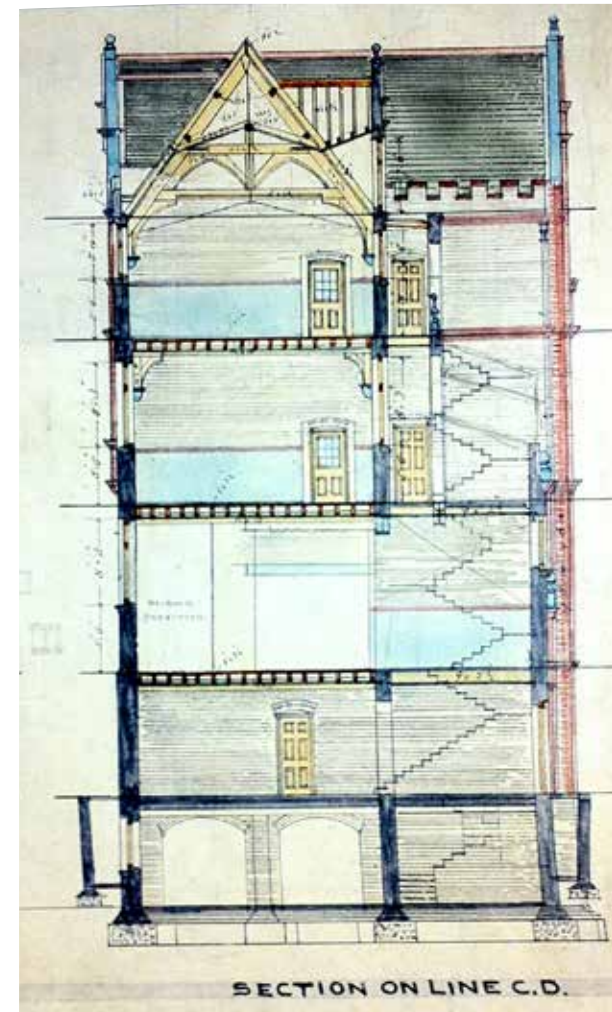
Original Building Plans c1870



Cross Section



Cross Section



Cross Section

By the 1880s the board was providing schooling for more than 350,000 children in London, and its swift rise was attributed to the quality of its school premises, which were often considered superior to charity or private schools.

Throughout the LSB's existence, they were responsible for building over 400 schools throughout London. It was the board's policy to only construct schools which would actively improve the appearance of the districts in which they were located – they were strong, sturdy and attractive structures – many of which are still in use today.

The children they provided an education for were usually, though, living in some of the most deprived areas of London. This can be said for the Tower Street Board School - an extract from the London Standard, below, gives us some idea of the conditions families in the area could have been living in.

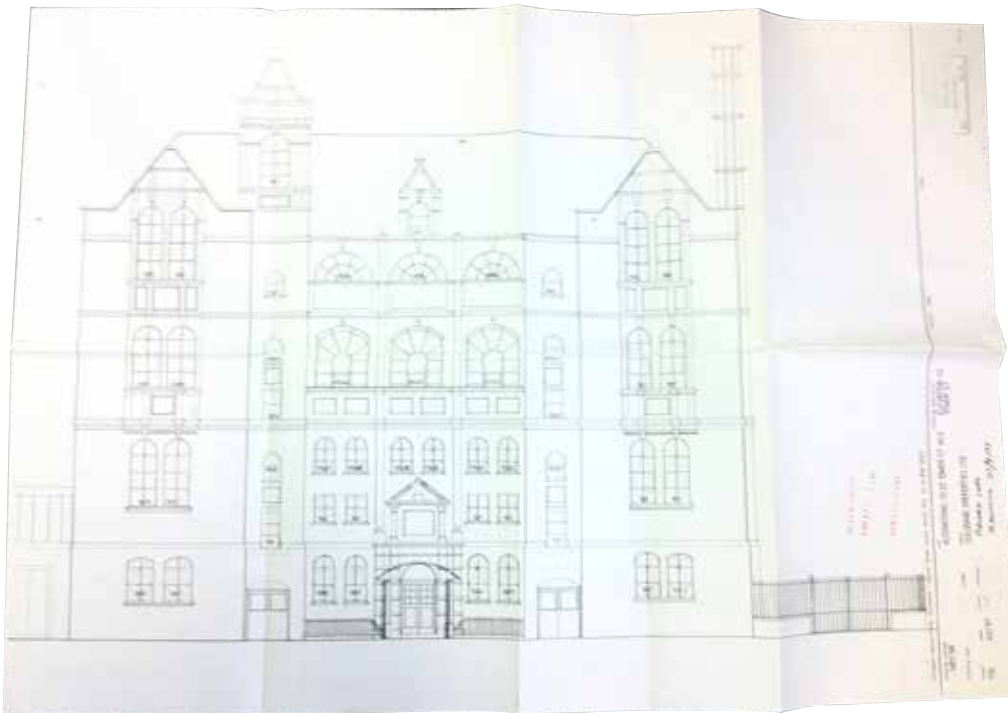


1934-40 LCC Revision Map

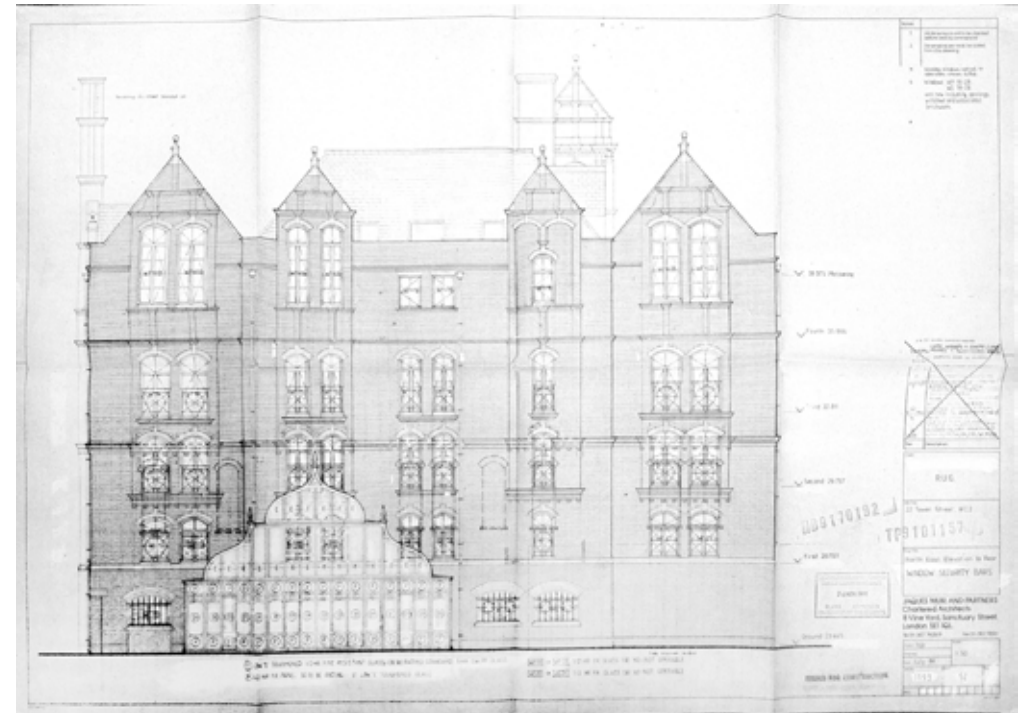
22 Tower Street remained a school and was little-changed into the 20th century, but it is known that in 1948, MGM Pictures Ltd put forward an application to convert the premises for their own use. In the applications relating to these proposals, the school is recorded as being 'disused', and on the 1938-40 OS map, the building is no longer labelled as a school. The alterations which MGM intended to carry out were to be thorough, but it is unknown whether or not these plans ever came to fruition – a memo in the Building Act Case File relating to No.22 suggests that MGM pulled out of at least part of these proposals.

By 1953, No. 22 Tower Street had become occupied by William Comyns & Sons Ltd, silversmiths. From documents accessed in the production of this report, we cannot be entirely sure when they vacated the premises, but they were certainly still occupying the building in 1980. What is known is that Comyns & Sons Ltd went into liquidation in 1987 – the same year

that applications were put forward to convert the building into office space. The majority of planning applications associated with this building post-date 1987, and will be discussed in more detail in the following sections.



1987, planning application drawings



2.4 LATE 20TH CENTURY PLANNING HISTORY

To inform more recent alterations to 22 Tower Street, a thorough search of historic planning applications was undertaken at the Camden Council Planning Department.

A number of historic applications relating to the site were found, although by far the most extensive of these were confined to the years 1987-1990. During this period the building was divided up internally into office space. This was done through the insertion of new partition walls on all floors, the removal of the 2nd floor in its entirety and the installation of new 2nd and 3rd floors in its place, and the insertion of new mezzanine floors. Externally, a large rear conservatory and a 'winter garden' extension to the front elevation at second/third floor level were added, and changes took place to the fenestration.

Other applications which were granted permission include basement excavations beneath the new conservatory extension, and renewal of railings and bollards outside the property.

Information regarding these buildings along with on site analysis has informed the preparation of a series of historic development plans and elevations which are included in this section to inform understanding of the building.

2.5 SITE ASSESSMENT

2.5.1 INTRODUCTION

An inspection of the proposed development site and its environs was undertaken on the 19 March 2014. The inspection sought to assess the existing building stock and identify any features of heritage merit that may be affected by the conversion of the building into residential use and the restructuring of its layout. This information informs the statement of significance in Section 3 and the ensuing impact assessment.

Few original documents relating to the construction of the building were located – the only pre late 20th century floor-plan found was a basement-level drainage plan of c. 1875. Some original elevations were also located, which have aided the analysis of the exterior. In the absence of a complete set of original plans, the phasing of the building has been analysed using 20th century planning documents and a thorough interior inspection.

2.5.2 EXTERIOR DESCRIPTION AND INTERPRETATION

The main block of 22 Tower Street comprises a ground floor plus 4 storeys over a basement. Built of yellow stock brick with red brick and stone dressings, the structure has steep, gable-ended slated roofs. The main south elevation features a not-quite-symmetrical 2-1-3-1-2 composition with projecting end bays and a large, stucco doorcase. To the rear is a large, modern conservatory which, judging by previous planning applications, can be dated to c. 1988. This conservatory is a ground floor construction, but its roof extends upwards to third floor level. During the same phase of alterations, sections of the basement beneath the newly-built conservatory were also excavated for use as office space.

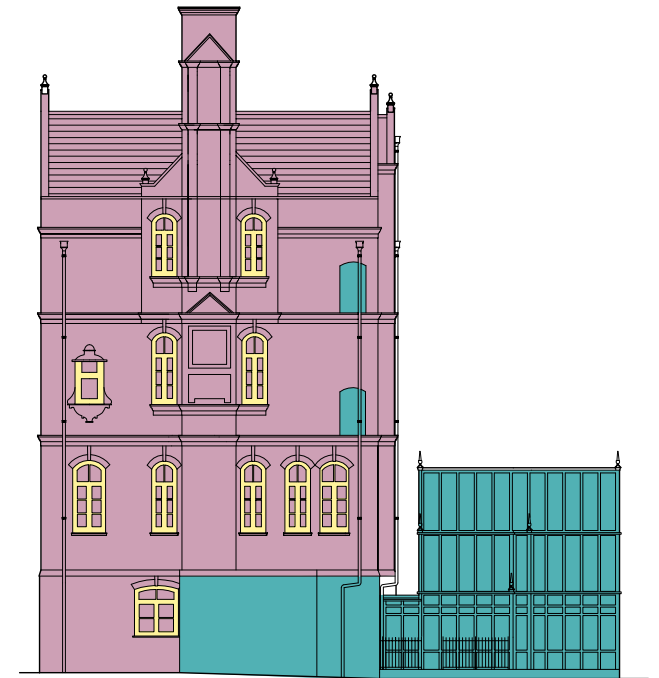
On the south elevation facing onto Tower Street, a glazed 'winter garden' was added at second/third floor level during the alterations of c. 1988. Fenestration to the front elevation has remained largely intact, although all window-frames were replaced with modern wooden reproductions in the late 20th century.

The rear elevation underwent significant change during the works which took place to the building in the late-1980s. As part of these, the second floor was entirely removed internally. In its place, two new floors were added above and below its original position. At the same time, all first floor fenestration to the rear was removed, and two new

HISTORIC DEVELOPMENT PLANS

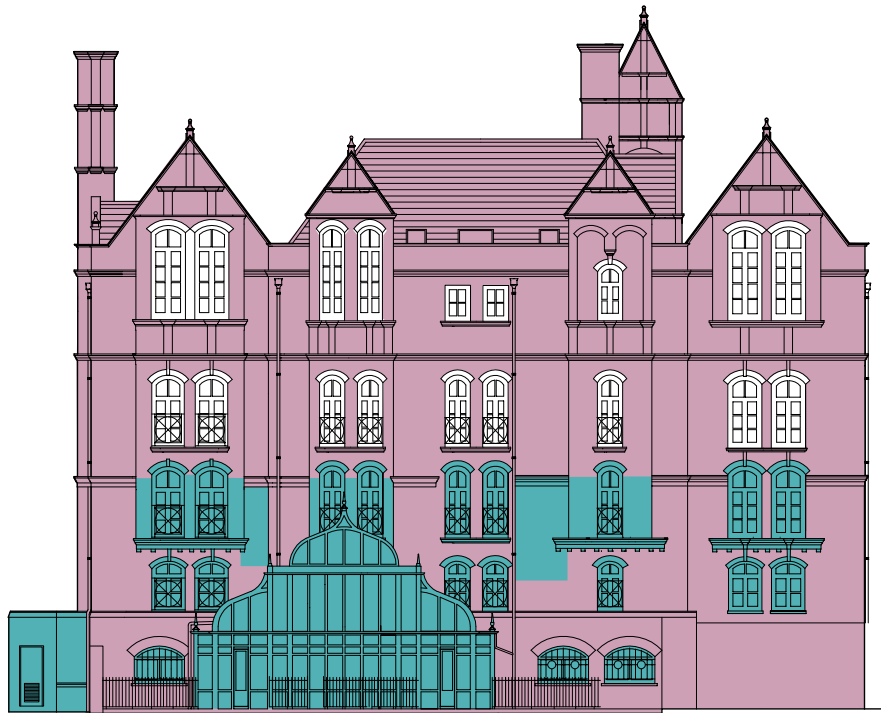


FRONT (SOUTH-WEST) ELEVATION

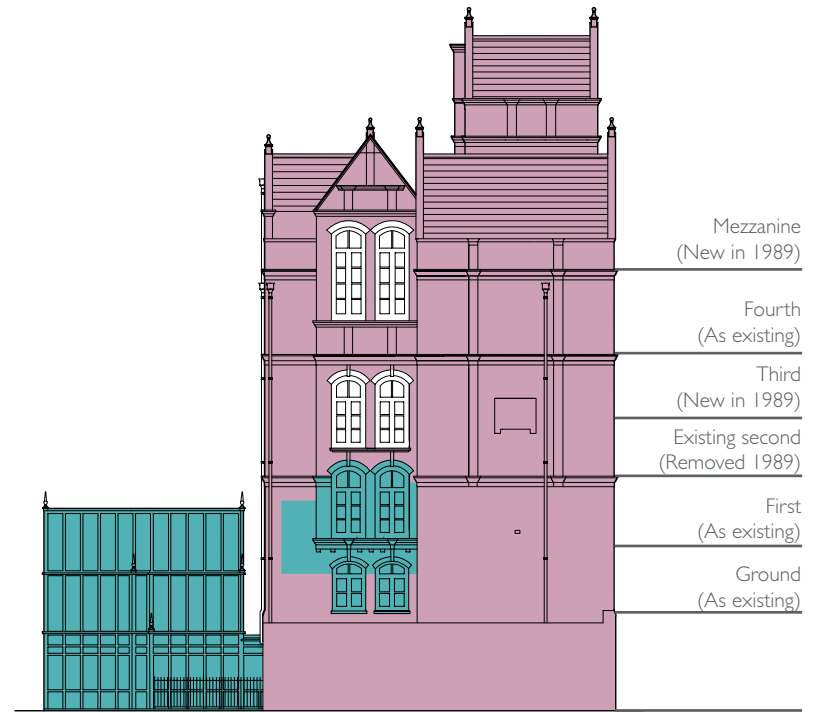


SOUTH-EAST SIDE ELEVATION





REAR (NORTH-EAST) ELEVATION



NORTH-WEST SIDE ELEVATION

Original Fabric
 1980s Alterations
 Late 20th Century insertion. Positioning original but wooden frames and door replaced.

Unknown Date
 Not Surveyed

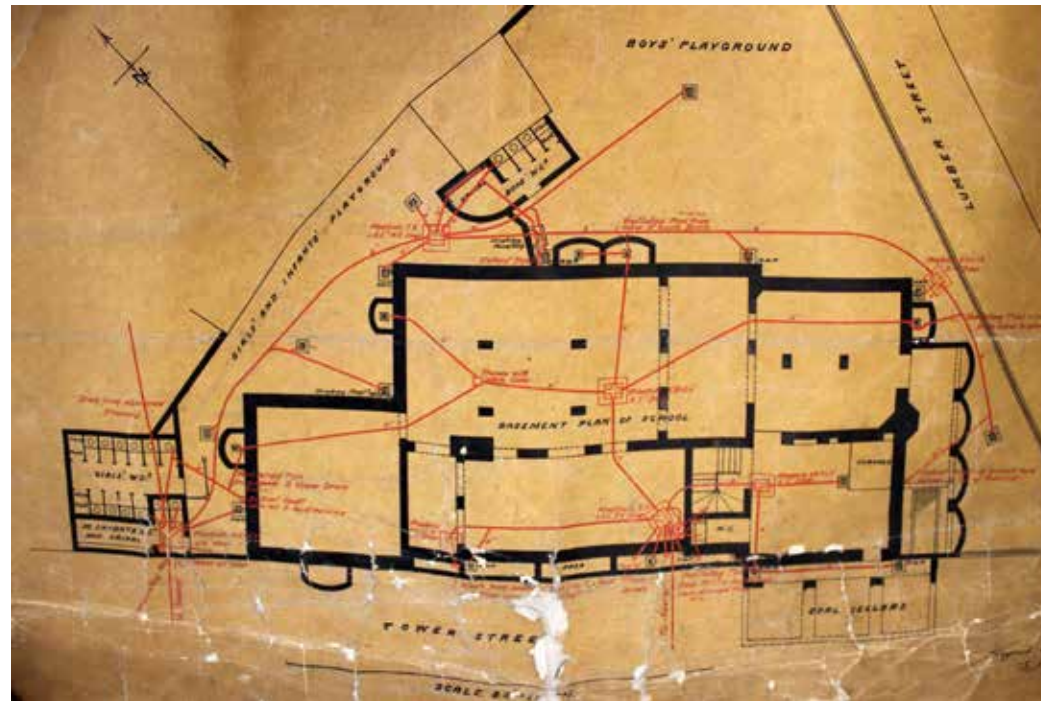


- 1 Main Tower Street frontage, with glazed winter garden at 2nd/3rd floor level
- 2 Rear of 22 Tower Street viewed from Tower Court
- 3 Modern conservatory to the rear
- 4 Dug-out basement area to the rear – beneath the conservatory

storeys of windows installed in their place. In some cases the new window openings were placed on the same vertical alignment as the original first floor windows, and in other cases original openings were blocked entirely. The projecting sections within four of the bays, which ended at original second floor level, were extended downwards to new second floor level.

Similar alterations also took place to the north and south side elevations, with windows removed and new ones inserted. There are few traces of these alterations remaining to the exterior.

There is currently no visible evidence of basement windows below street level on any elevation apart from the modern additions (c.1989) to the rear east frontage, underneath the conservatory. However, analysis of original c.1870s plans suggests that sunken basement windows were present on the east, west and north frontages.

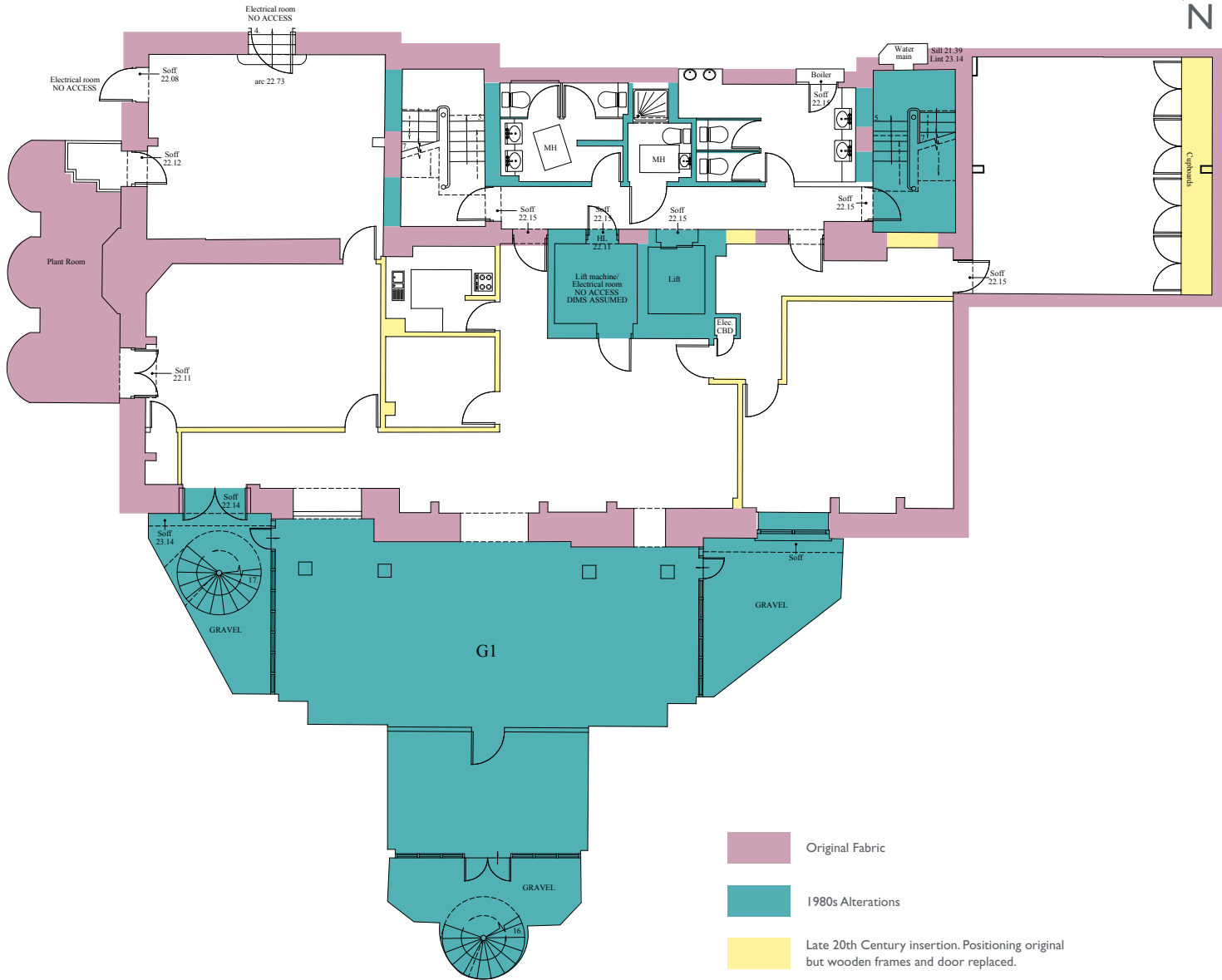


Drainage Plan. Undated likely to be late 19th century in origin



- 1 Basement corridor – lift electrical room to the right (inserted during the 1980s conversion), and store room & kitchen to the left (late 20th century, but of uncertain date – likely also dating to the 1980s).
- 2 Basement room, with view towards excavated conservatory extension (c.1989)

PHASING PLAN - BASEMENT



2.5.3 INTERIOR DESCRIPTION AND INTERPRETATION

The interior of 22 Tower Street has been substantially altered on every floor; with very few original features remaining. A number of new partitions, new floors and suspended ceilings have been inserted in areas throughout, and the vast majority of heritage features stripped. A thorough inspection of the interior was undertaken during the site visit in order to inform understanding of the structure, its remaining features and potential historic significance. As noted above, one of the most significant changes this building underwent was the removal of the second floor; and the insertion of two new floors in its place. The rear elevation phase plan on page 19 shows the positioning of these new floors in comparison to the originals.

The current proposals seek to convert the building for residential use, with the creation of self-contained dwelling units. Available evidence suggests that the building has not previously been used for residential purposes, and was most recently in use as offices.

Basement

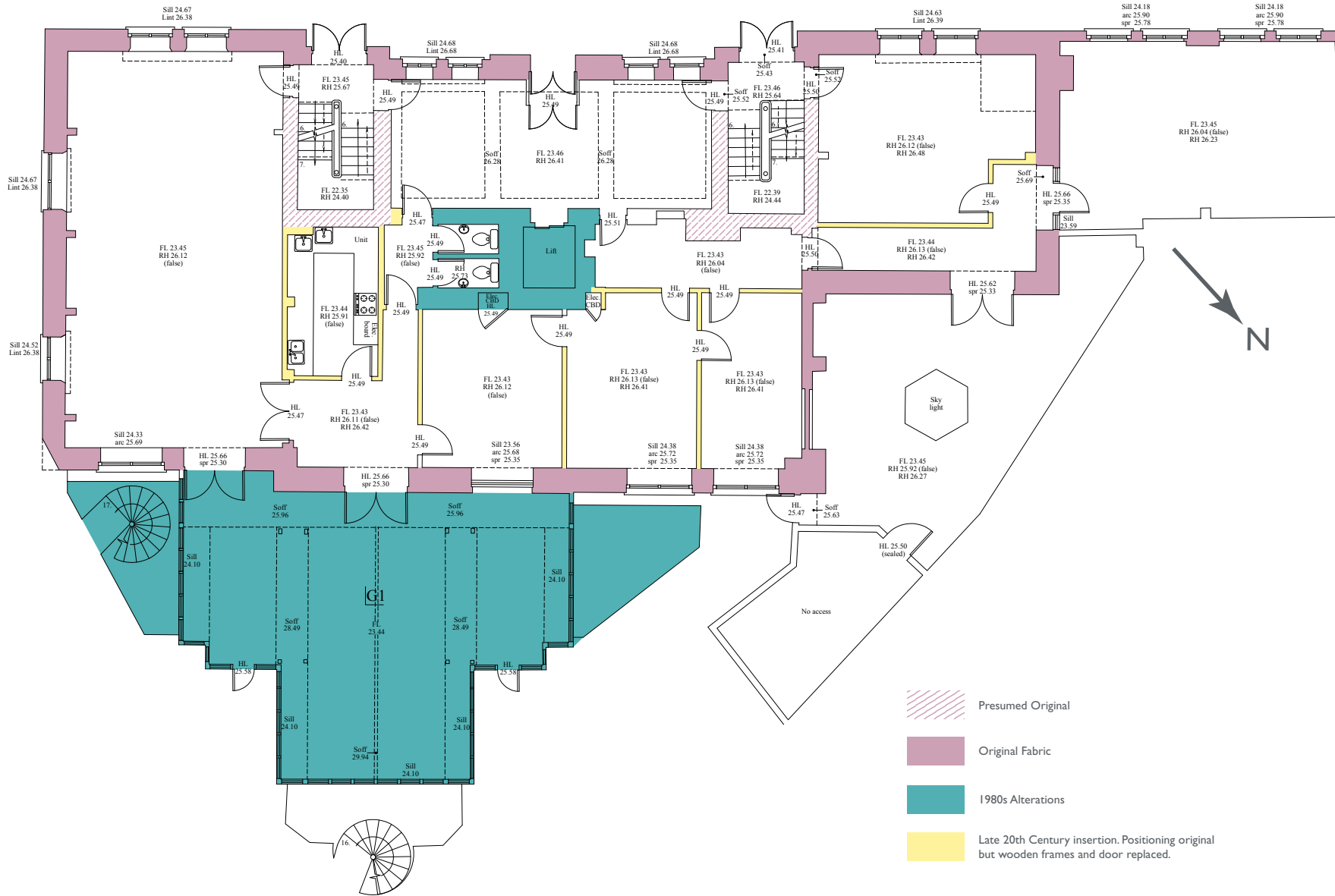
Phasing of the basement level was aided by a drainage plan dated shortly after the building's construction. In comparing this plan to subsequent planning documents and a thorough internal inspection, we can gauge with some accuracy the level of remaining original fabric.

The basement phase plan on page 22 shows the extent of later alterations to the basement, with the majority having taken place post-1987, when the first phase of late-20th century alterations were known to have occurred. Some original walls



- 1 Entrance hall, with modern porch and fixtures.
- 2 Interior of room leading to rear conservatory
- 3 Rear conservatory

PHASING PLAN - GROUND FLOOR

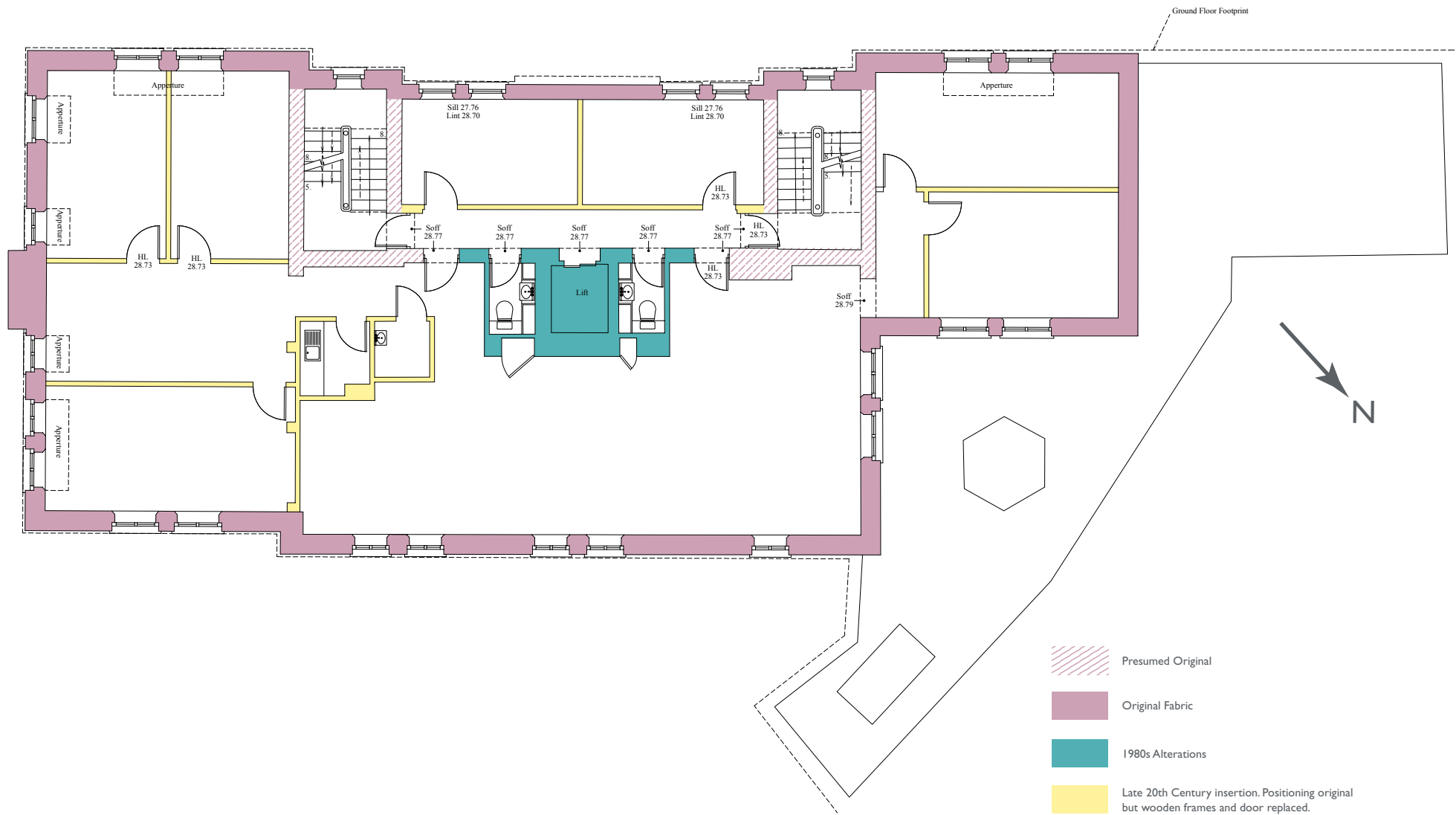


remain but in general, the layout is much altered. Many smaller rooms and corridor spaces have been created, and no original features were noted within the interior. Ceiling is a modern insertion.

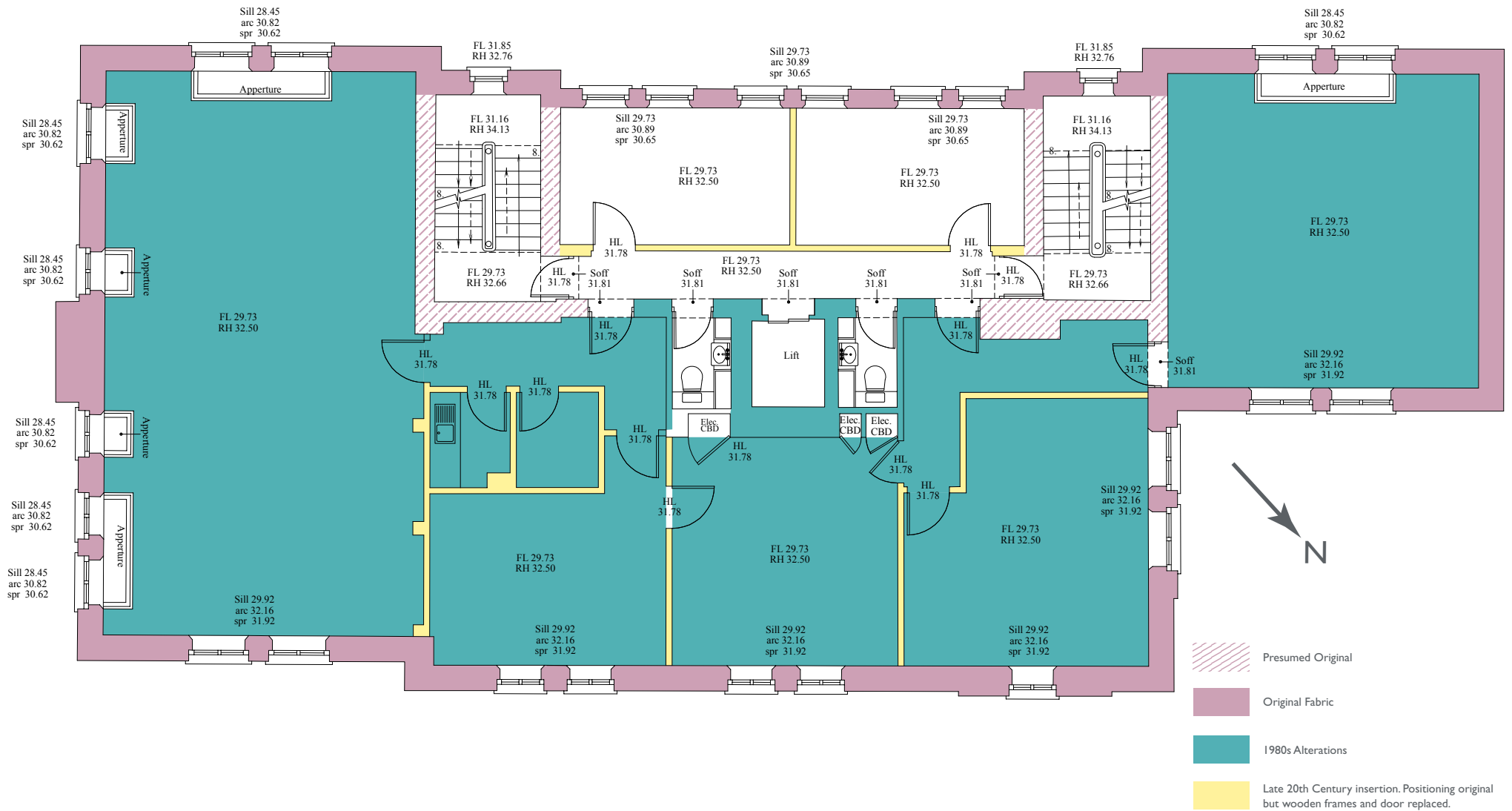


- 1 Second storey room overlooking Tower Court – part of the inserted second floor
- 2 Second storey room
- 3 Windows on the second floor overlooking Tower Court – first floor room visible below.

PHASING PLAN - FIRST FLOOR



PHASING PLAN - SECOND FLOOR



Ground Floor

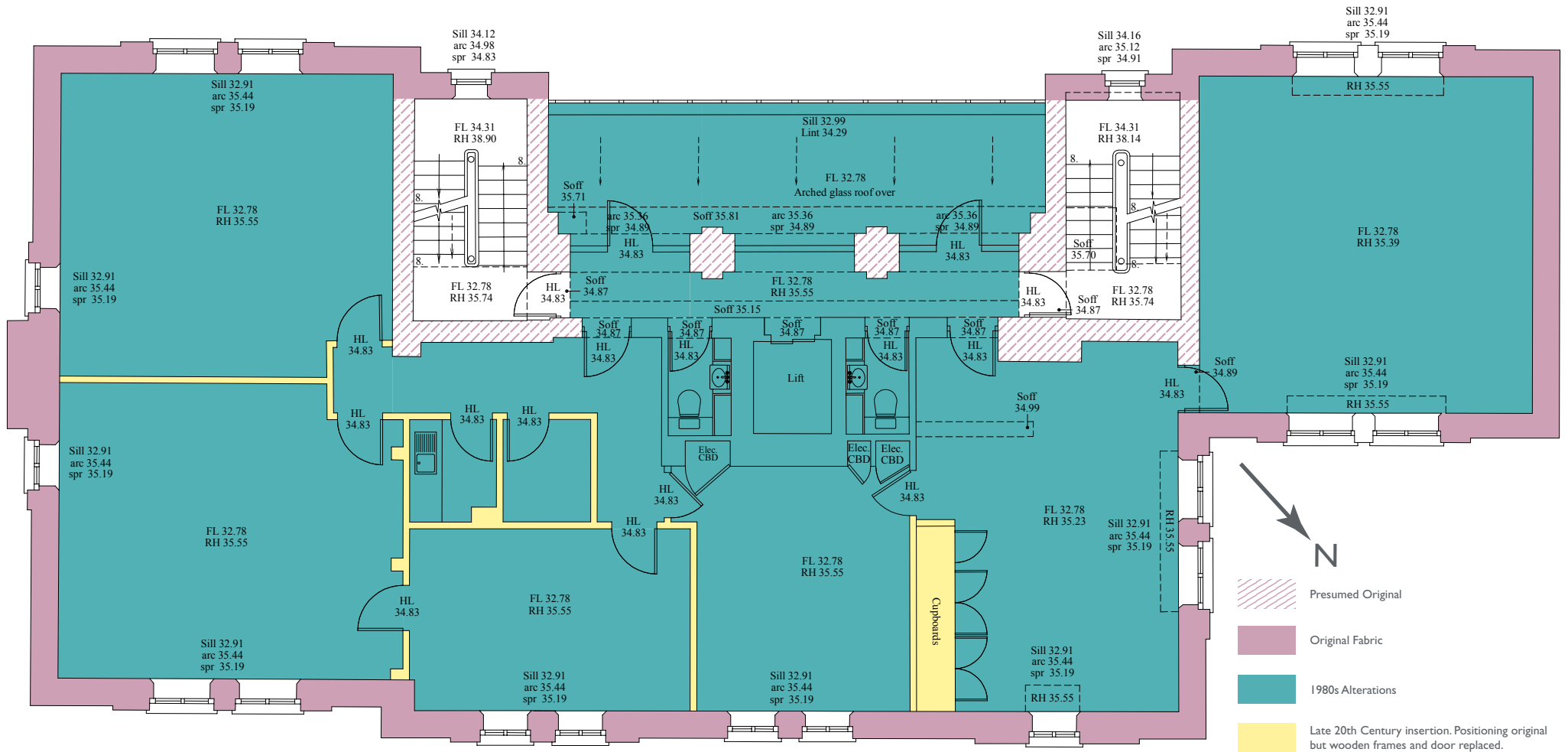
The ground floor has also undergone a significant number of alterations, which the phasing plan over leaf illustrates. Walls enclosing the two (modern) staircases either side of the main entrance are likely to be original, endorsing the separate 'boys' and 'girls' stairs which formed part of the original school.

In general, the layout is known to be modern – original fixtures & fittings are either missing or covered, and the space was divided up and walls and a lift shaft inserted during the 1980s or possibly during slightly later 20th century alterations. Once again, both layout and scale have been much changed. To the rear a large conservatory was constructed in the late 1980s.



- 1 Winter Garden' inserted to front elevation
- 2 Third floor room – all rooms on this floor have a very similar modern layout and modern fixtures
- 3 Doorway from 'winter garden' to corridor behind.

PHASING PLAN - THIRD FLOOR



First and Second Floors

Similarly, the first floor has been very significantly altered, with a lack of original features, numerous inserted partition walls and an overhaul layout. Again, the walls surrounding either staircase (although not the staircases themselves) which are later insertions, are likely to be original.

The second floor was inserted as part of the 1980s alterations, and is at an entirely new level. Some windows – particularly on the front and south-east elevations – are sliced through by the insertion of this new floor. In these cases, glass apertures were constructed in the first storey ceiling/second storey floor to accommodate this change.

Third Floor

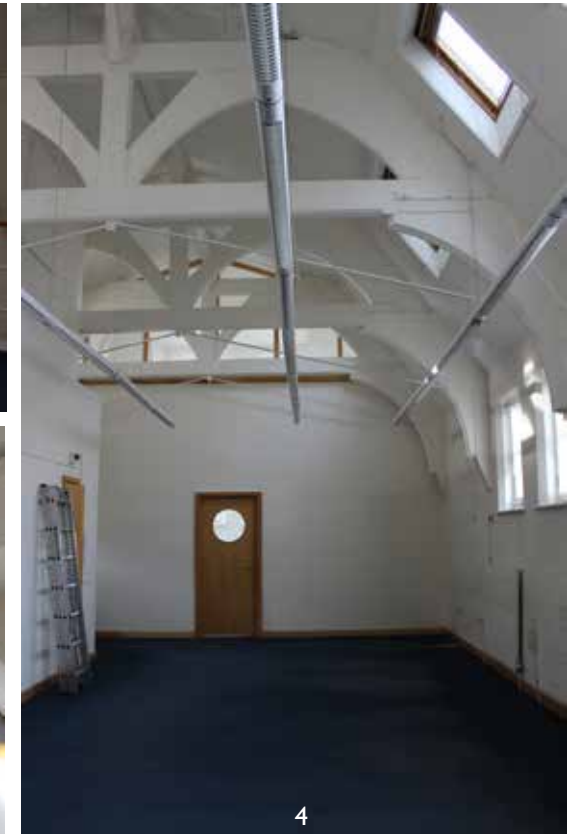
Like the second floor, the existing third floor was inserted during the late 1980s renovations and is entirely new. The only remaining original elements on this floor are the enclosing walls of the two staircases as for the other floors.

It is to this floor that the 'winter garden' was added to the front exterior during the 1980s renovations, and a new room created. Originally, this space was set-back and probably formed a kind of enclosed terrace as suggested by the original elevation drawings. Original brickwork was noted above the doorways into this new extension. (See photograph 3)

Fourth Floor and Mezzanine

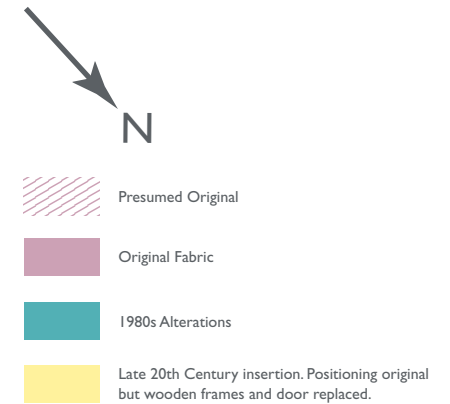
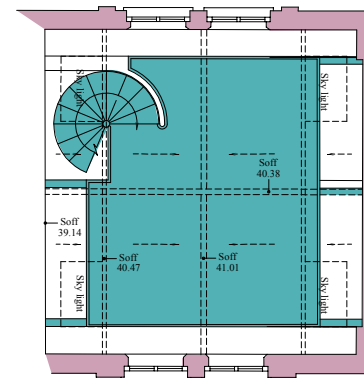
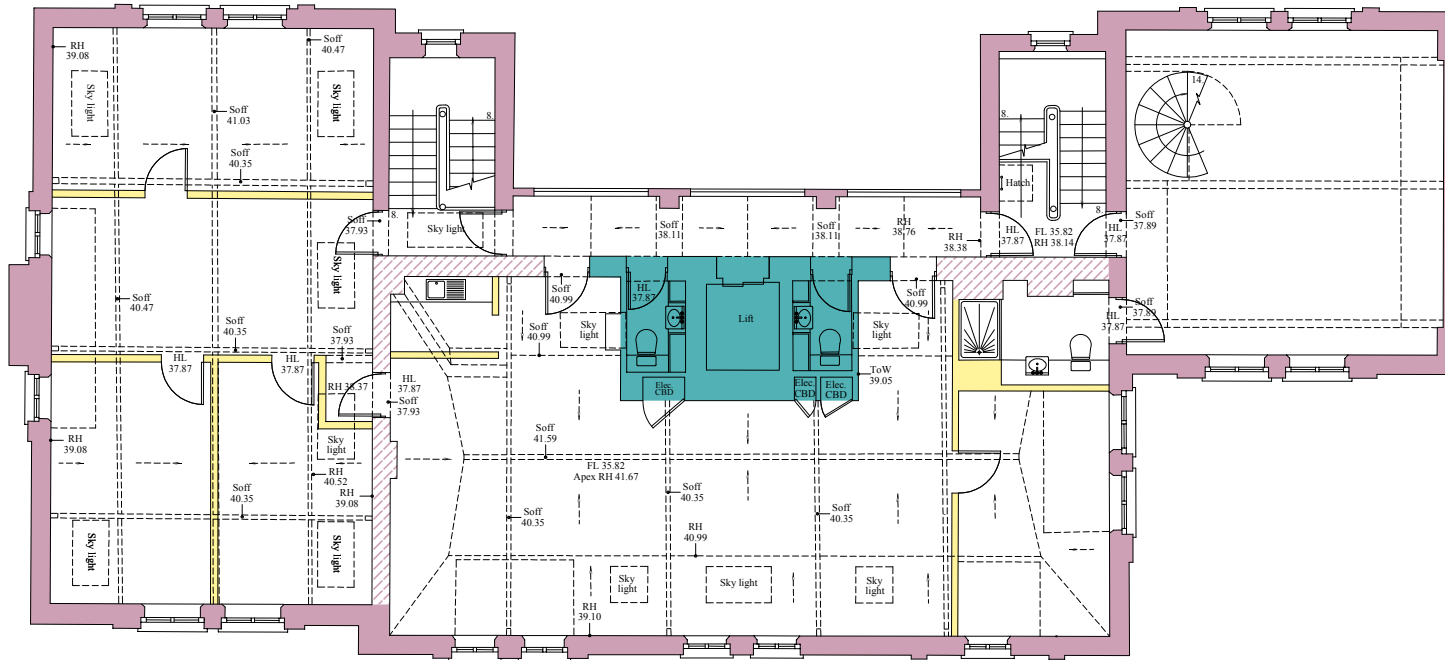
The fourth floor is one of the more interesting sections of the building, as it takes in the high ceilings and beams of the original roof structure. In terms of other fixtures and alterations though, the floor is of much the same character as the rest of the building and has been much divided and altered.

An application to insert tall dividing walls with glass inserts into the fourth floor was granted in 1994, and it is presumed that most of the works carried out on this floor date from this time. Some presumed original wall remain and these are detailed on the plan on the following page, but most are later insertions. The mezzanine floor is also late 20th century.



- 1 Mezzanine level – a late 20th century addition
- 2 Further inserted walls from the 1994 scheme
- 3 Lunette windows along the Tower Street frontage. Windows were shown as square within semi-circular brick encasements on the original elevations – it is unknown when these were inserted into those existing brick encasements, but late-20th century is presumed.
- 4 Main fourth floor space – lift shaft to the left, and 1994 inserted wall and doorway ahead

PHASING PLAN - MEZZANINE AND FOURTH FLOOR



3

SIGNIFICANCE

3.1 ASSESSMENT OF SIGNIFICANCE

The following assessment of significance has drawn guidance from the English Heritage Publication Conservation Principles: Policies and Guidance (2008). This section will assess the heritage significance of 22 Tower Street with particular regard to those areas impacted by the current development proposals. The wider context of the building within the Seven Dials conservation area is also relevant to this study given the change that will be imposed upon the setting of the building as a result of the addition of a rear extension in place of the current late-1980s conservatory.

3.2 EVIDENTIAL VALUE

Evidential value comprises the potential of a place to yield evidence about past human activity. These can be gleaned from archaeological, architectural, artefactual or documentary evidence for example.

Several phases of change are known to have taken place at 22 Tower Street, and these are evidenced both within the building fabric and its associated documentary record. The most significant changes which took place occurred in the late 20th century – from the 1980s until the mid-1990s.

During these alterations the interior of the building was almost entirely reorganised, with whole new floors as well as new rooms being constructed. There was very little re-use of original features or fabric. Less is known about alterations which took place to the building prior to the 1980s, but no planning applications which proposed any significant alterations have been identified prior to this date.

While the building dates from the 1870s, the alterations it has been subject to internally have stripped much of its original fabric. The nature of historic alteration was fairly wholesale in its removal of historic fabric leaving a low potential for the discovery of further historic material (ie through opening up works in the future) only moderate potential for the building fabric to reveal further evidence about its history.

A further evidential potential exists for the recovery of buried archaeological deposits within the site footprint, both beneath the basement and beneath those areas of the site beyond the basement footprint. There is some potential for current proposals to uncover buried deposits with construction of the new rear extension, although the majority of planned alterations do not include ground intrusive construction activity.

There is some potential for further investigation of unknown architectural features across the building, which could enhance understanding and appreciation of the building. The potential for the discovery of further masked architectural features of significant value is considered to be low.

Low Evidential Value

3.3 HISTORICAL VALUE

Historical value concerns the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative in nature.

The programme of research undertaken to inform this report has identified its position as one of the earlier schools constructed by the London School Board. The LSB was an influential force in the organisation of schooling within London – not just during its existence, but for some time after its abolition.

Although 22 Tower Street ceased to operate as a school no later than the early 20th century, its associations with the LSB are still strong, and clearly evidenced in aspects of its architecture – for example, the stone plaques and the separate staircases for boys and girls. The stone plaque to the left of the chimney, depicts an angel showing a book to two young children. The location of the school in such an area is also of some significance – Seven Dials was at the time a notorious slum, and the school would have catered for some of the most deprived children in London.

Moderate Historic Value

3.4 AESTHETIC VALUE

The aesthetic value of a building refers to the ways in which people draw sensory and intellectual stimulation from a place, and to its architectural quality.

The main aesthetic quality of the building is retained within the main elevation fronting onto Tower Street. This facade retains a high level of historic character and has only been subject to moderate and reversible alterations over the years.

The architecture of the building is characteristic of that used by the London School Board, and there are specific elements of its facade which represent this. For example, a stone plaque inscribed 'For LSB' can be seen on the 4th floor of the left-hand bay, and on the chimney facing on to Tower Court is another carved stone plaque.

The large scale of the structure in its relatively narrow setting is another key aspect of its aesthetic quality. The rear elevation is clearly visible from Tower Court, but it has had its historic form significantly downgraded by the addition of the large, unsympathetically designed conservatory structure. Numerous changes to fenestration at the rear have also taken place.

Externally the aesthetic quality of the building has been compromised by the addition of the conservatory extension and the 'Winter Garden' at the main elevation.

Internally, the building is almost entirely unrecognisable as a building which once acted as a school, and it has been subjected to a great number of intrusive alterations. Very little of the original layout remains, and original fabric has been either stripped or hidden behind much later additions.

High Aesthetic Value

- Main façade

Moderate Aesthetic value

- Rear elevation and its relationship to Tower Court – downgraded due to the later addition of the conservatory and changes in fenestration.

Low Aesthetic Value

- Interior

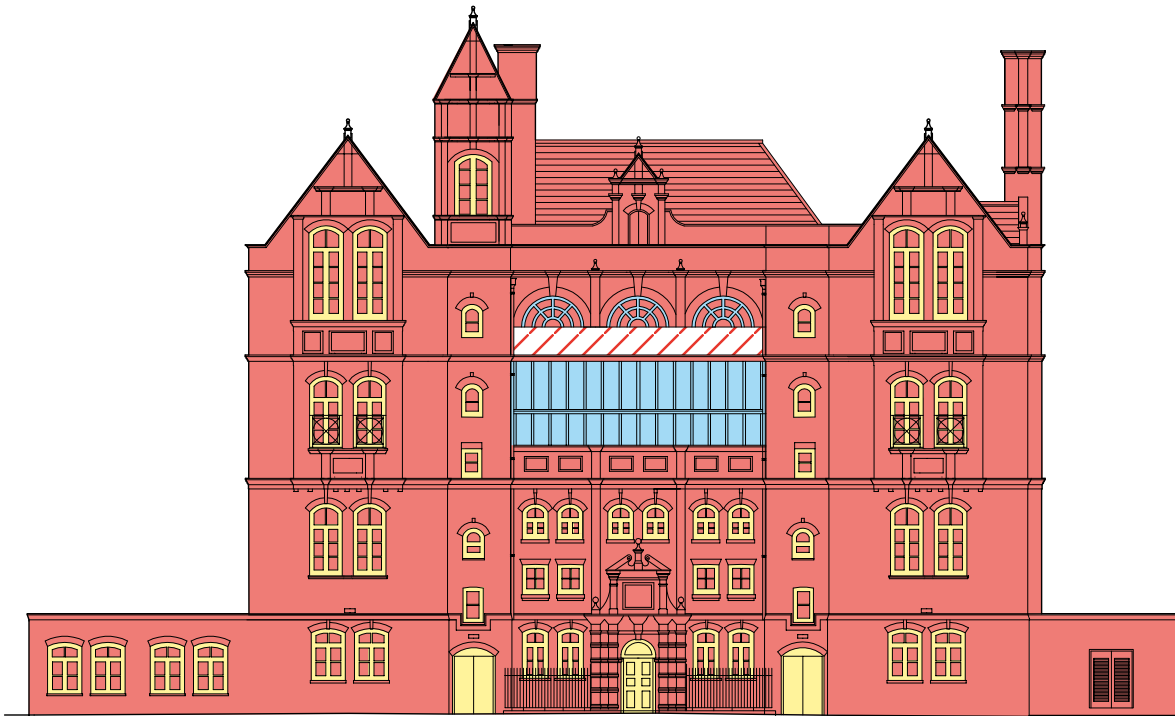
3.5 COMMUNAL VALUE

Communal value is, in essence, centred on the importance of a place to the people who use, experience and value it. Therefore, it is important to consider the public perception and use of the site and translate this into an understanding of communal value.

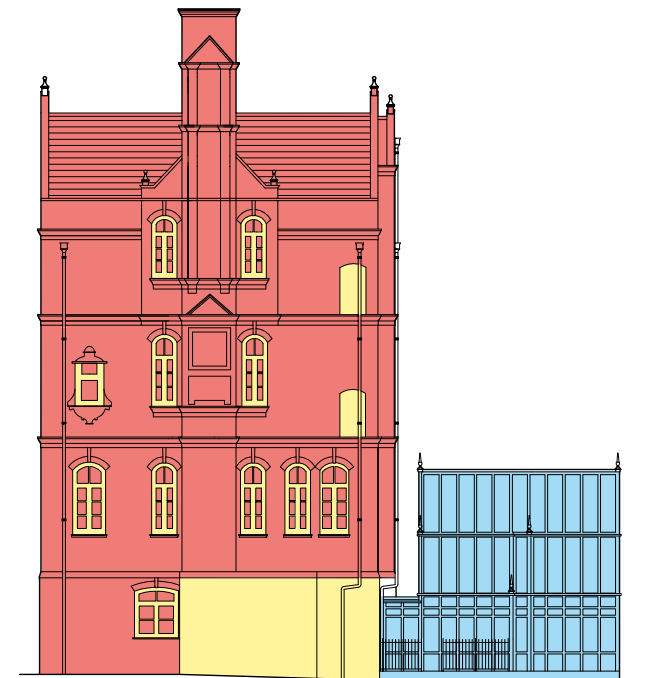
The building occupies an important location in the district of Seven Dials, and would have played an important communal and educational role in the lives of individuals growing up in the area. However, the building has not been in use as a school for some years – evidence suggests since at least the 1930s since which time it has been in private use as a workplace. This change in use has limited possible interactions with the site which the public may once have experienced. The relationship between 22 Tower Street and the wider Seven Dials district enhances its communal value – as a school it served the population of the area, and therefore plays an important part in the development and history of the locality. Tower Court in particular; to the rear of the property, still retains a distinct character with its neighbouring 18th century buildings, and may act as a draw for interested groups spending time in the area of Seven Dials.

Moderate Communal Value

SIGNIFICANCE PLANS



FRONT ELEVATION



RIGHT SIDE ELEVATION

Significance Ratings

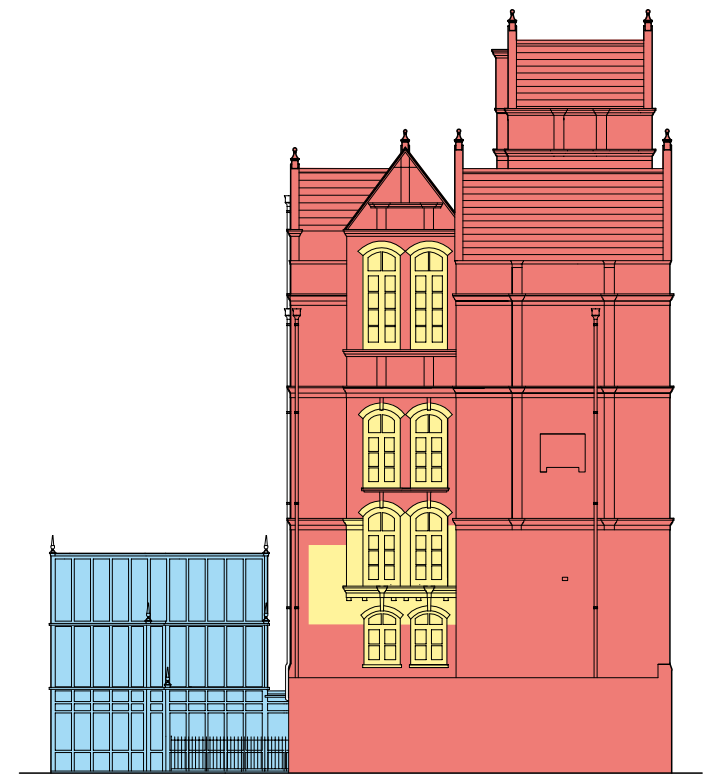
- HIGH**
- MEDIUM**
- NEUTRAL**
- INTRUSIVE**



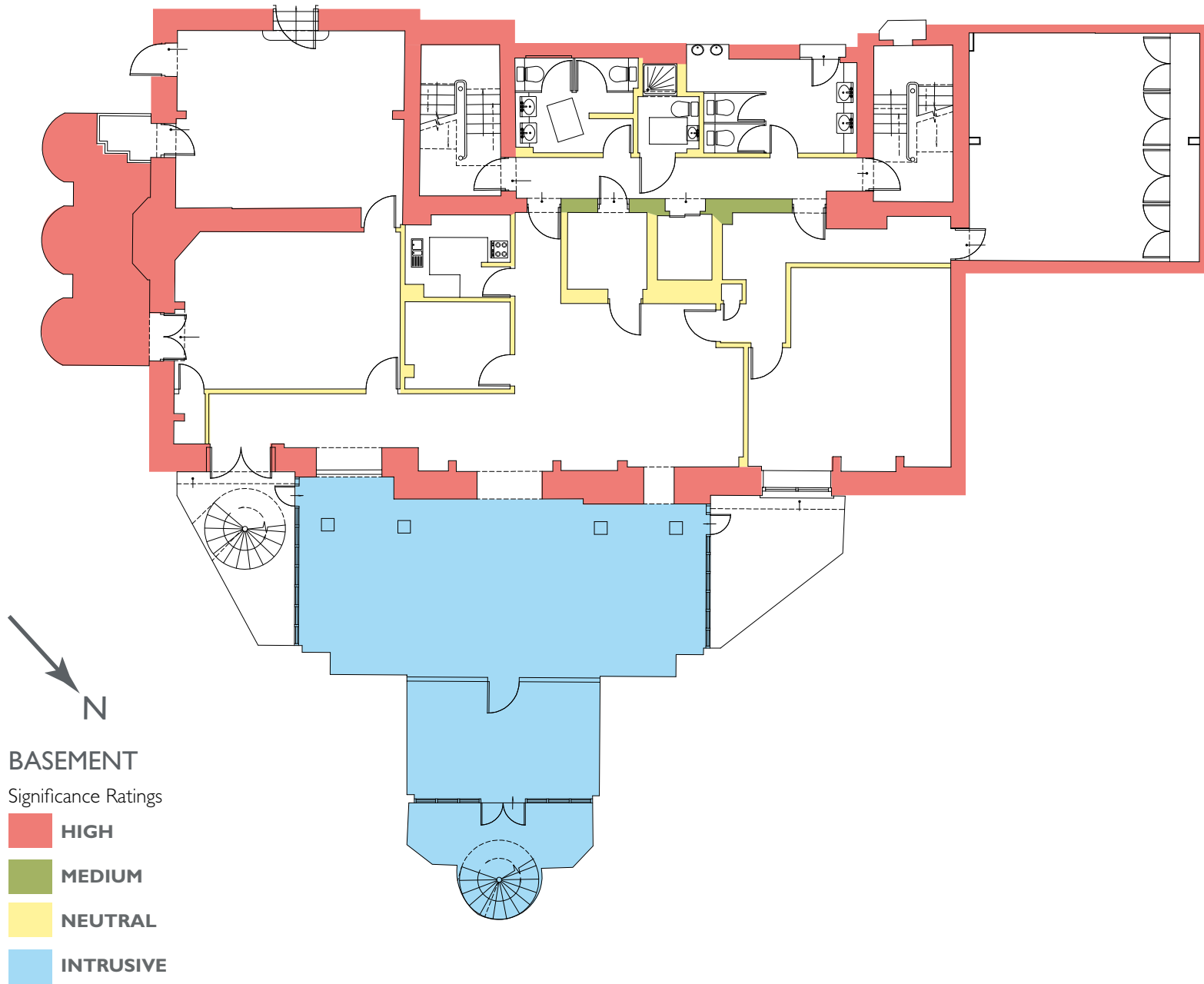
REAR ELEVATION

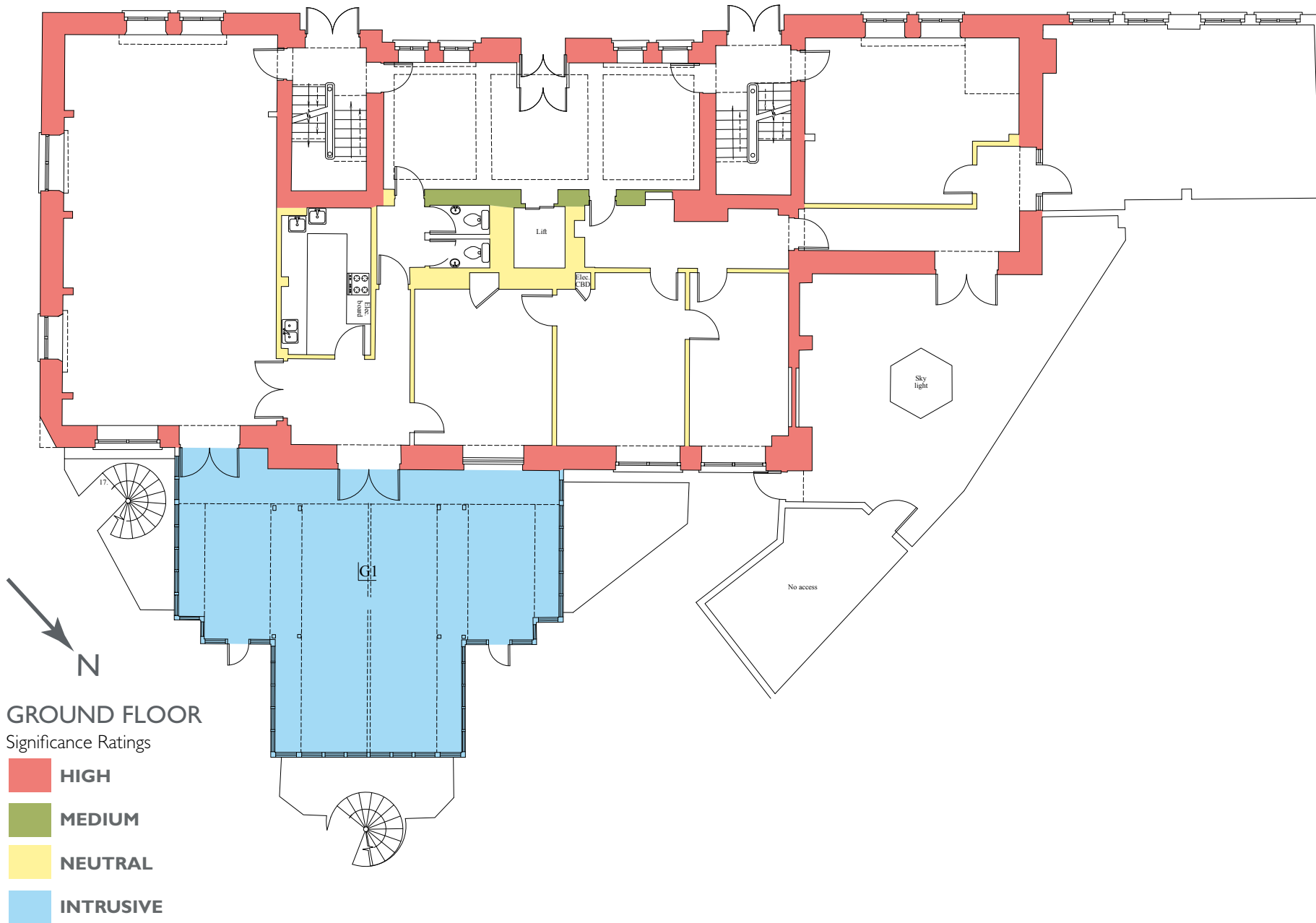
Significance Ratings

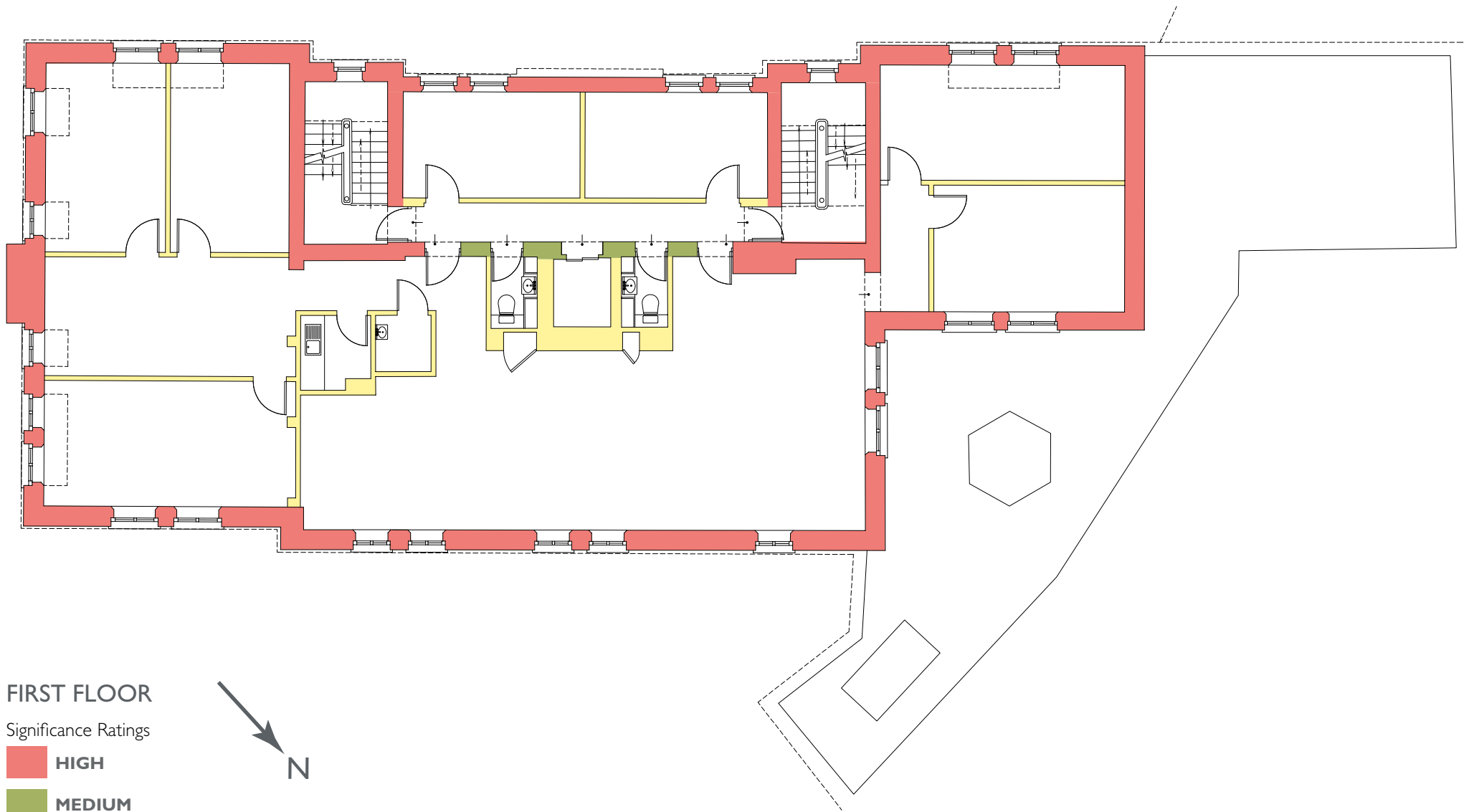
- HIGH**
- MEDIUM**
- NEUTRAL**
- INTRUSIVE**



LEFT SIDE ELEVATION



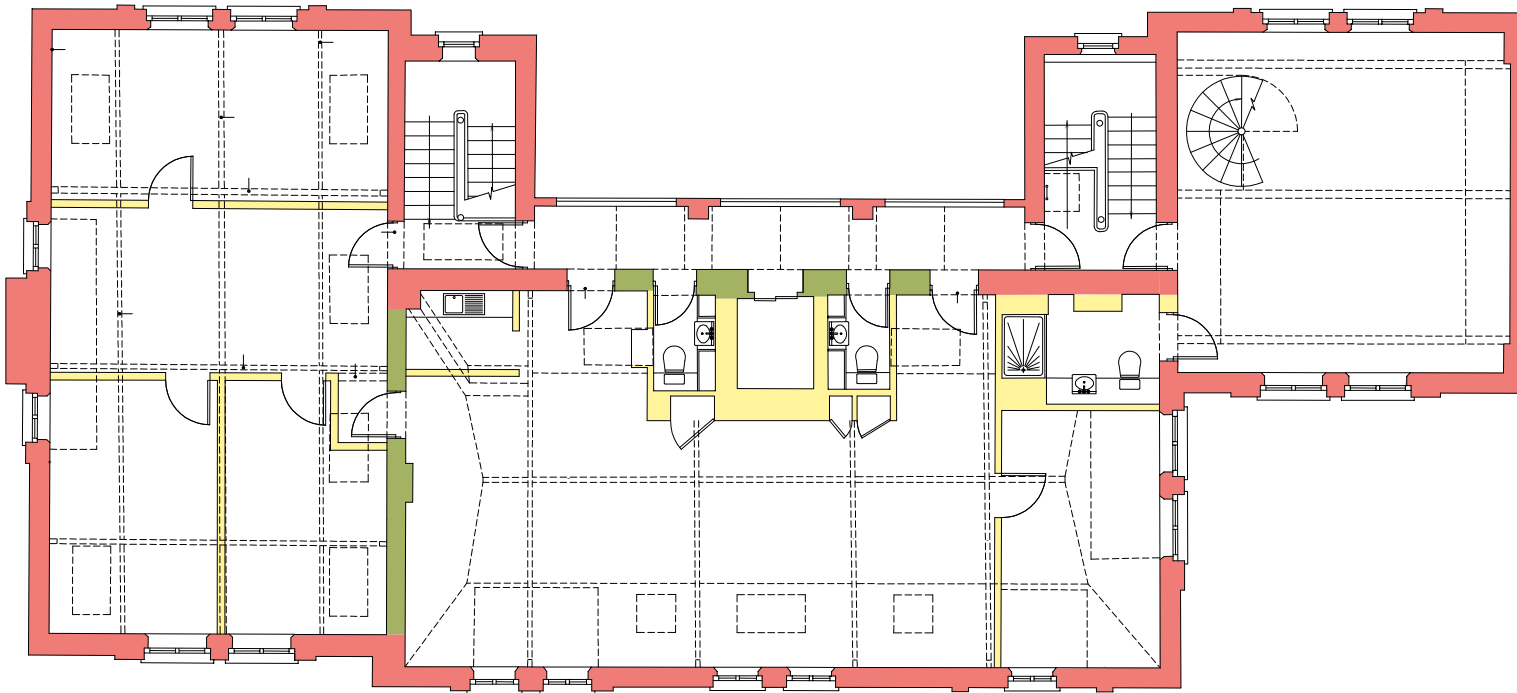




FIRST FLOOR

Significance Ratings

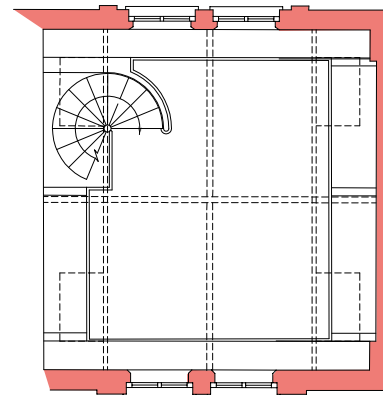
- HIGH**
- MEDIUM**
- NEUTRAL**
- INTRUSIVE**

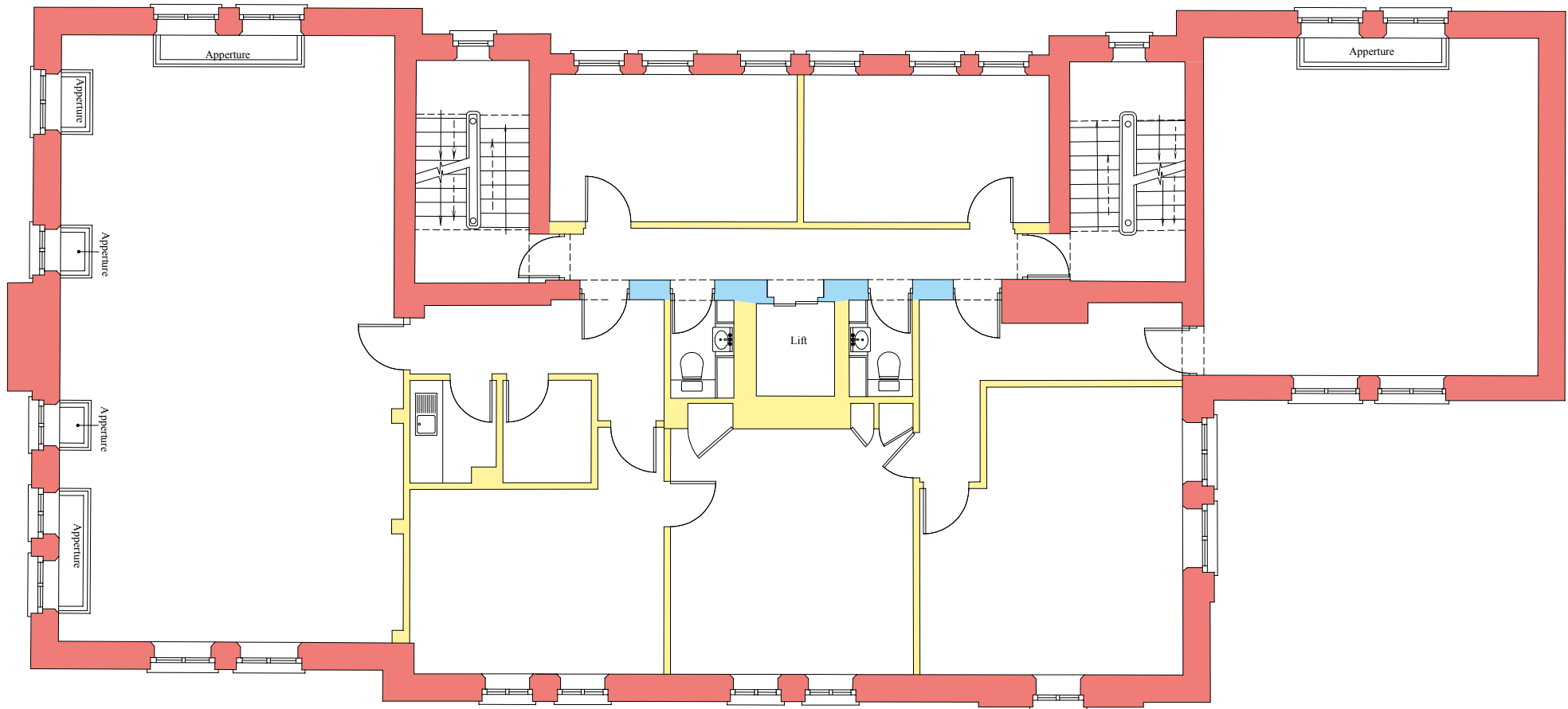


FIRST FLOOR AND MEZZANINE

Significance Ratings

- HIGH
- MEDIUM
- NEUTRAL
- INTRUSIVE



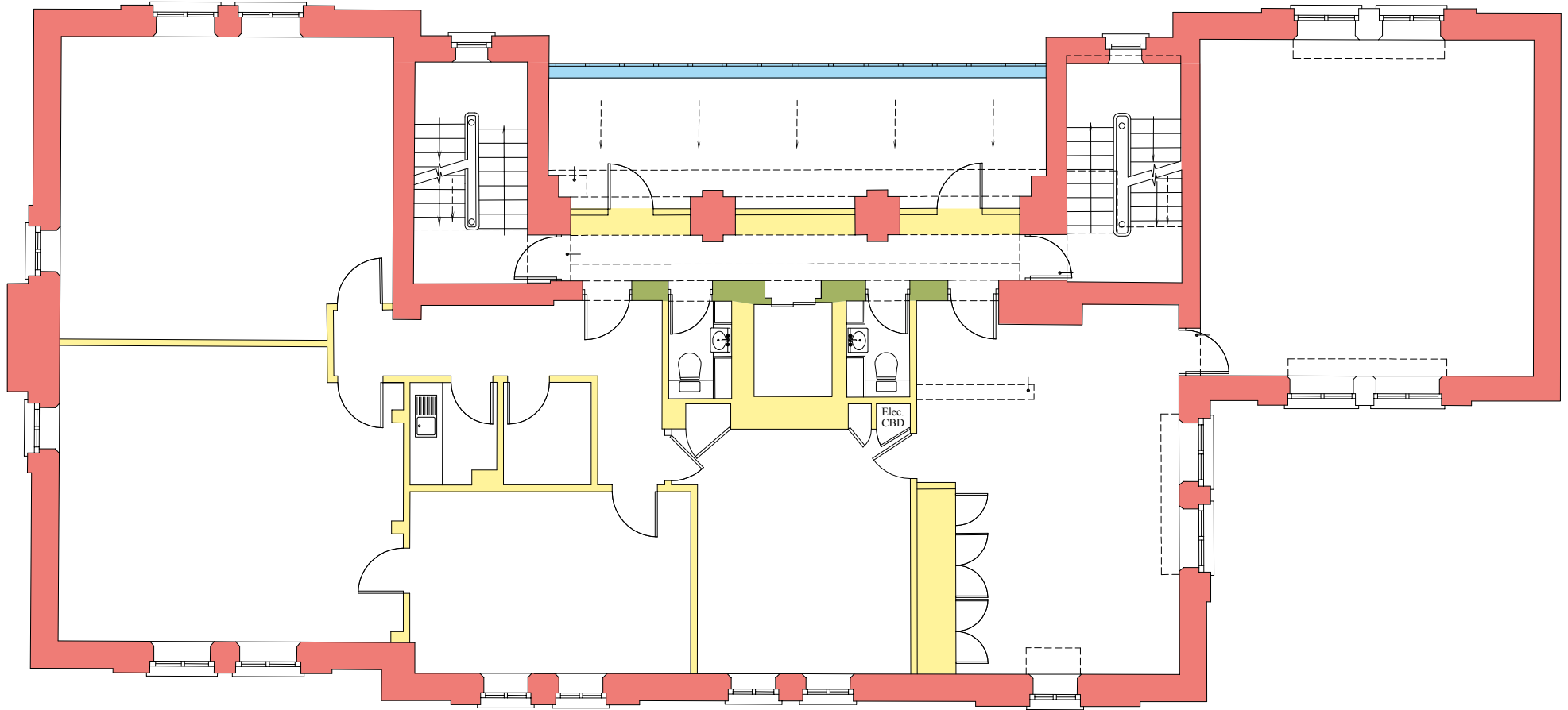


SECOND FLOOR

Significance Ratings

- HIGH**
- MEDIUM**
- NEUTRAL**
- INTRUSIVE**





THIRD FLOOR

Significance Ratings

- HIGH**
- MEDIUM**
- NEUTRAL**
- INTRUSIVE**



4

HERITAGE IMPACT ASSESSMENT

4.1 INTRODUCTION

This impact assessment deals with the impact of proposed change across the site on the heritage value of 22 Tower Street and its wider historic context in both direct and indirect terms. Both adverse and beneficial impacts are assessed. The impact assessment adopts ICOMOS assessment criteria to provide an unbiased, logical assessment of the proposed changes to help inform the planning decision.

Broadly speaking, the key potential heritage receptors are:

- The Grade II Listed 22 Tower Street
- The Seven Dials Conservation Area
- Surrounding Listed Buildings on Tower Court and Earlham Street

Changes that may affect these heritage receptors (both negatively and positively) as a result of development include:

- Alterations to the external appearance of 22 Tower Street
- Internal alterations to 22 Tower Street

4.2 OUTLINE OF PROPOSED DEVELOPMENT WORKS

This section gives a general overview of the alterations proposed at 22 Tower Street and for which planning permission is sought.

The proposed scheme has been developed through close consultation between the design team at Claridge Architects and the Heritage Consultants at Purcell, to ensure that the proposals respect the heritage value of the building and enhance the listed fabric and the appearance of the Conservation Area as much as is possible.

The heritage appraisal has identified a number of key elements which contribute to the significance of the building, these are itemised below for clarity

Key heritage survivals

- The Tower Street elevations in particular its presence, materiality and scale within the streetscape and its broad symmetry.
- The survival of the vertical dual stair shafts reflecting historic circulation around the building
- The original exposed roof trusses.
- The basement under street arches
- A small number of internal walls
- Survival of external wall plaque and overall appearance of an educational building of a specific regional type.
- The historic context of the site in particular Listed Buildings in within the visual envelope.

Key heritage detractors

- The 1980's conservatory to the rear of the building
- The glazed 'winter garden' at the Tower Street elevation
- Quality and appearance of the internal modern finishes.
- Loss of the original floor levels.
- Insertion of Lift shaft

Knowledge and understanding of these heritage features and detractors has driven both the internal layouts and external appearance of the proposals to ensure the special architectural character of the former Edwardian School is both preserved and enhanced where possible.

Externally, the appearance of the building within the Conservation Area will be enhanced by the removal of the existing dated and unsympathetic conservatory and replacement with a more sympathetic extension in terms of scale and in the discretion of its design. The 'winter garden' at third floor level at the front elevation will be removed and the general appearance of the original façade as shown on the original architects drawings reflected in the new scheme. The overall appearance of the external elevations and roof will be enhanced through considerate conservation repair where needed and key features such as decorative plaques, door and window surrounds retained.

Internally, efforts have been made within the proposed design scheme to reinstate the sense of the historic spaces through the retention of the dual stair shafts reflecting historic vertical circulation around the building and the removal of unsympathetic partition walls and room finishes. The non-original stair fabric will be replaced with a new stair in one of the retained stair shafts and the other shaft will be retained with a new lift inserted. This insertion perpetuates the historic vertical circulation around the building. The retention of both circulation routes within the proposed scheme is significant echoing the functionality of the historic school building with separate entrances for girls and boys.

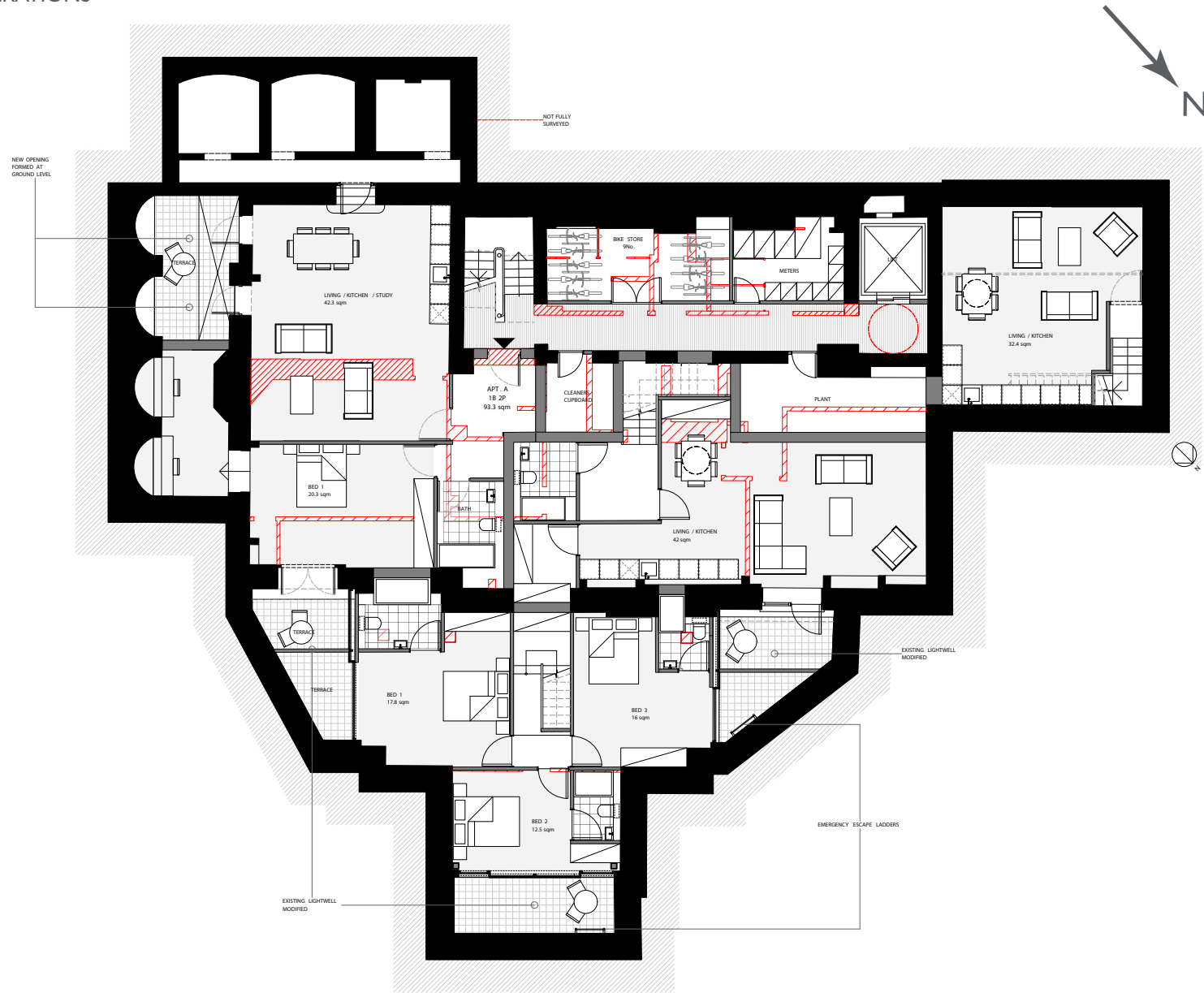
The basement proposals include the insertion of a glass ceiling over the currently subterranean basement arches beneath the south-east corner of the building to external ground floor level and the general retention of the basement arches across the basement floor.

The proposals for the top floor seek to remove unsympathetic room partitions to enhance the appearance and visibility of the roof structure within the developed space.

Throughout the building, unsympathetic partition walls, suspended ceilings and other generic modern interventions will be removed with more sympathetic replacements inserted which seek to rationalise the floor plan and re-introduce some of the simplicity of the presumed original floor plan.

The proposals have been developed through pre-application consultation with the London Borough of Camden (Refer Appendix C).

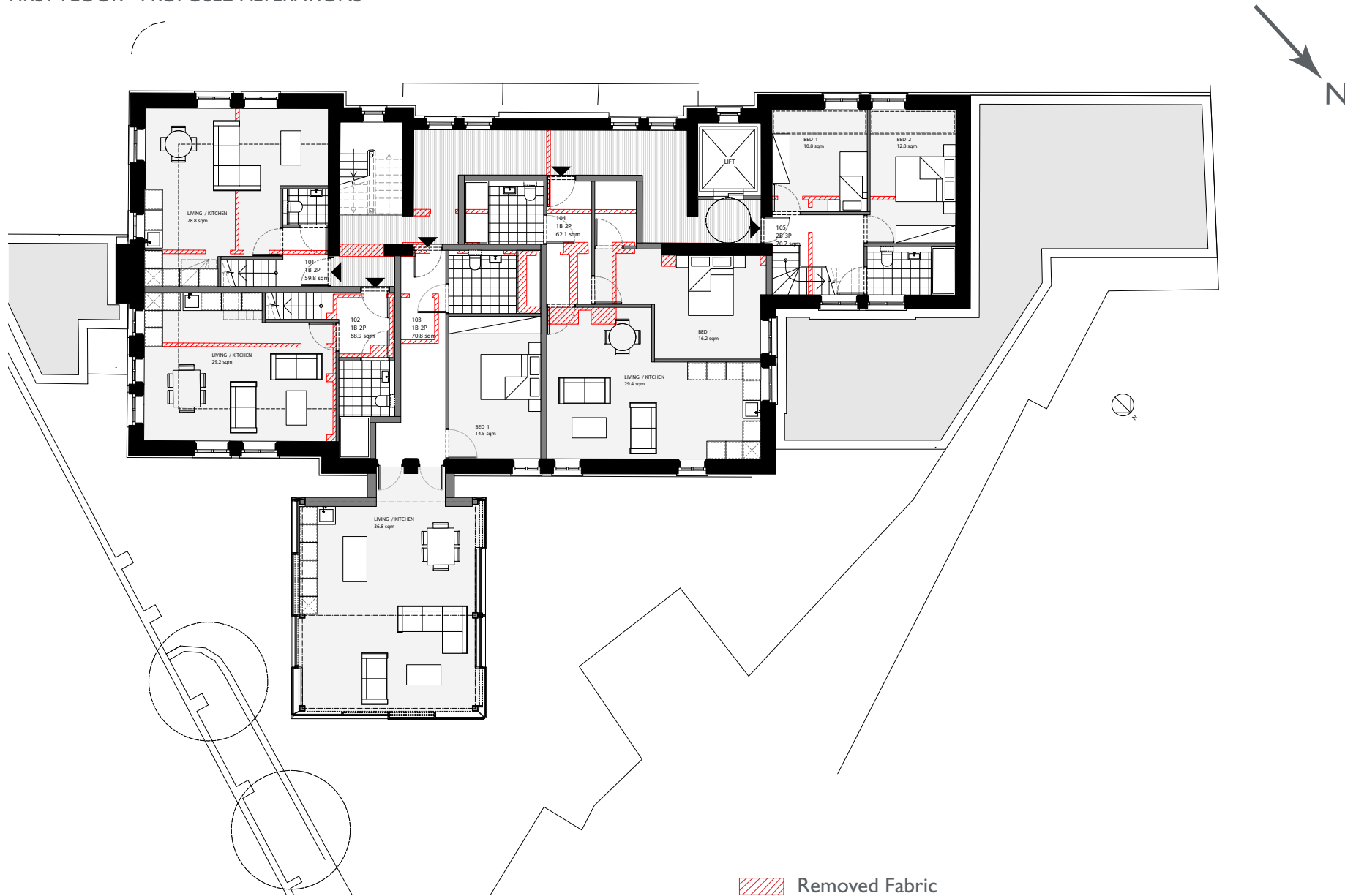
BASEMENT - PROPOSED ALTERATIONS



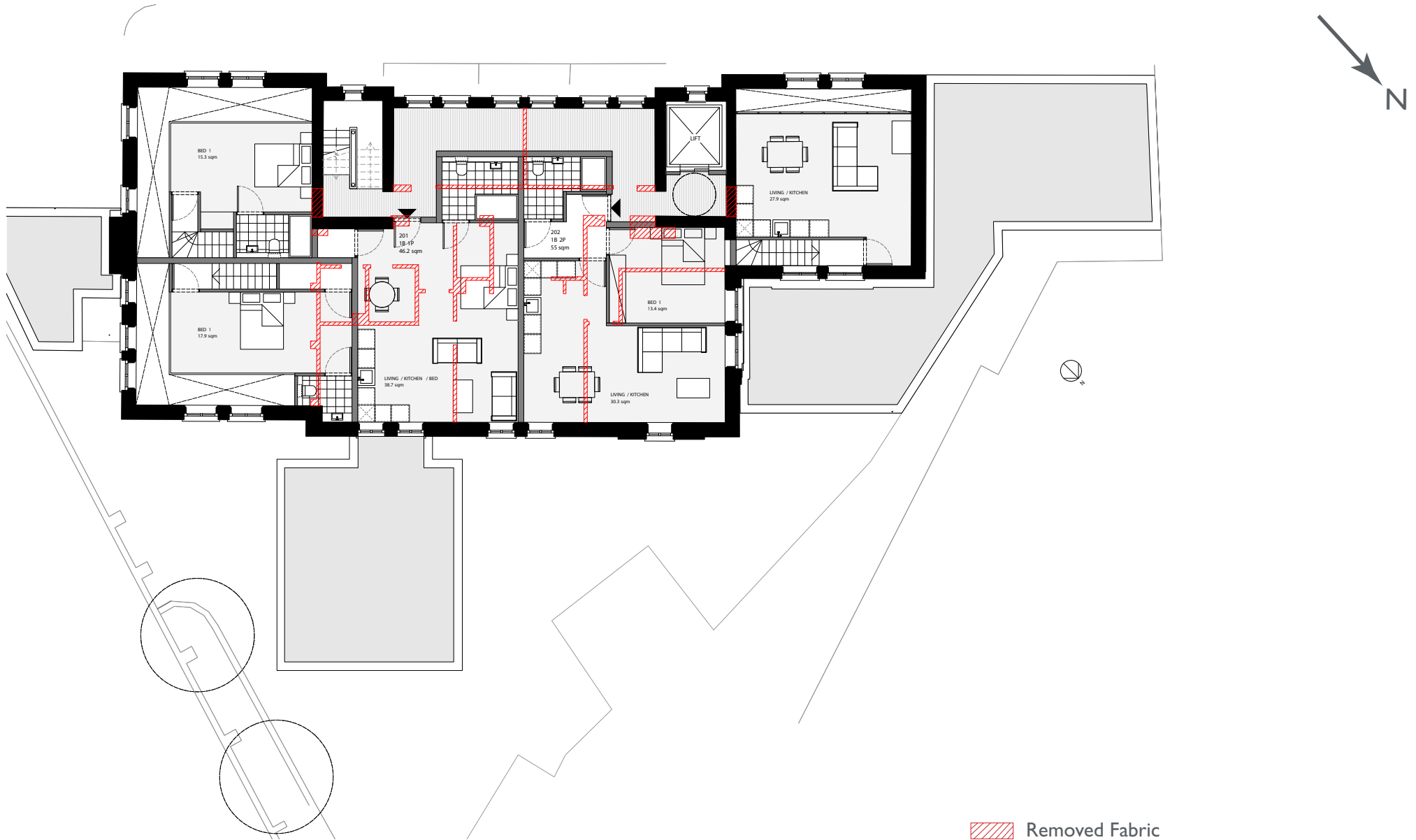
GROUND FLOOR - PROPOSED ALTERATIONS



FIRST FLOOR - PROPOSED ALTERATIONS

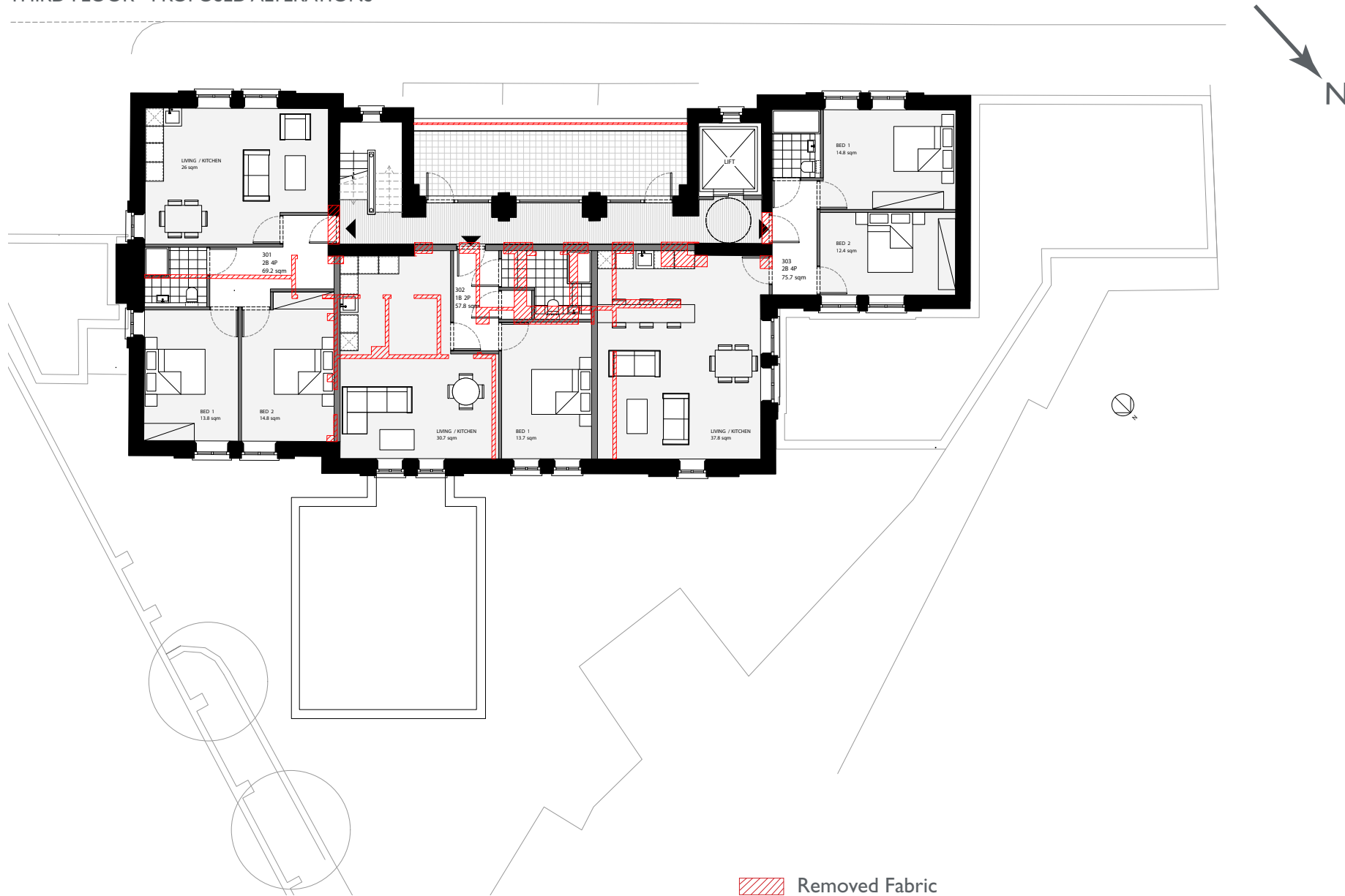


SECOND FLOOR - PROPOSED ALTERATIONS



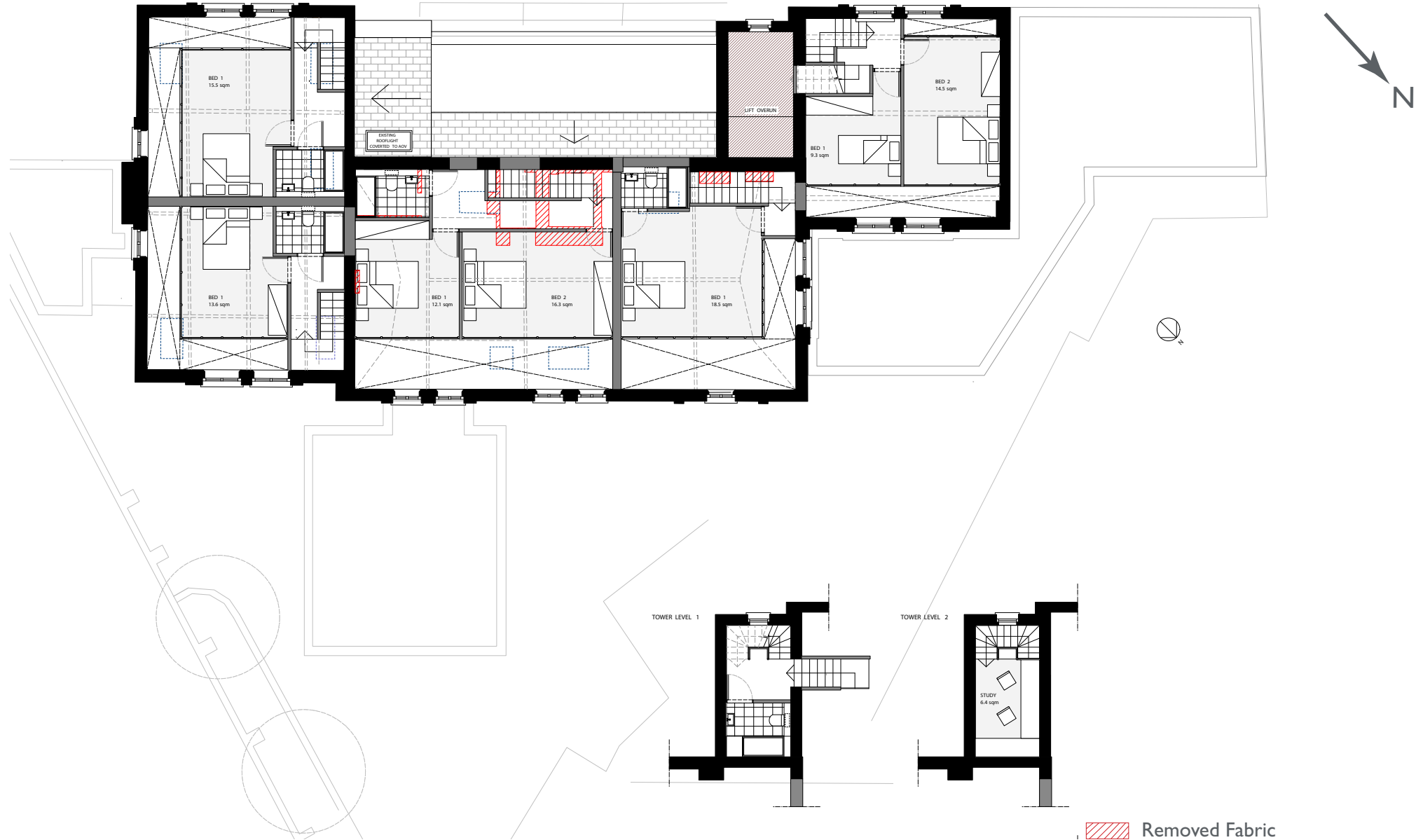
 Removed Fabric

THIRD FLOOR - PROPOSED ALTERATIONS



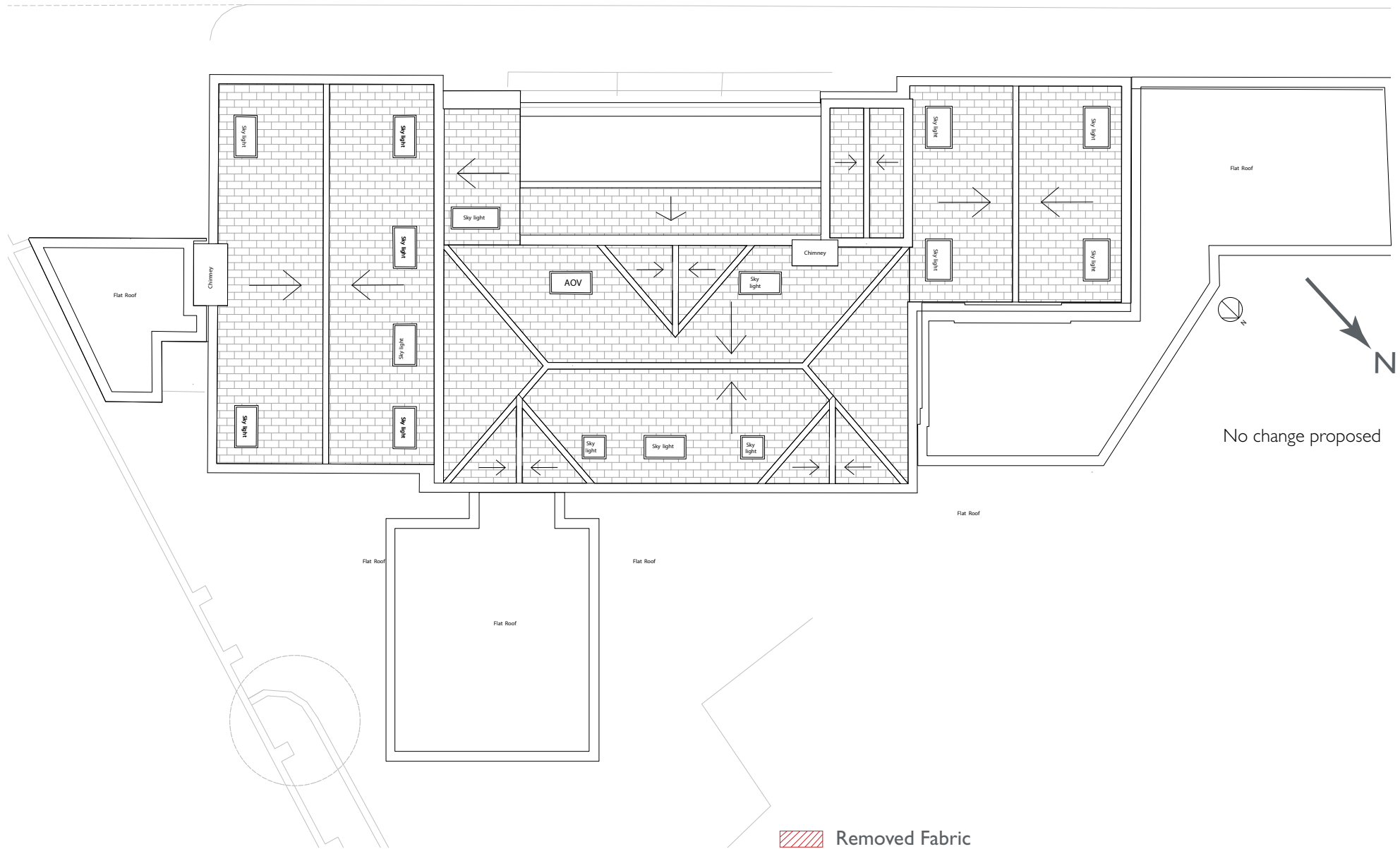
 Removed Fabric

FOURTH FLOOR - PROPOSED ALTERATIONS

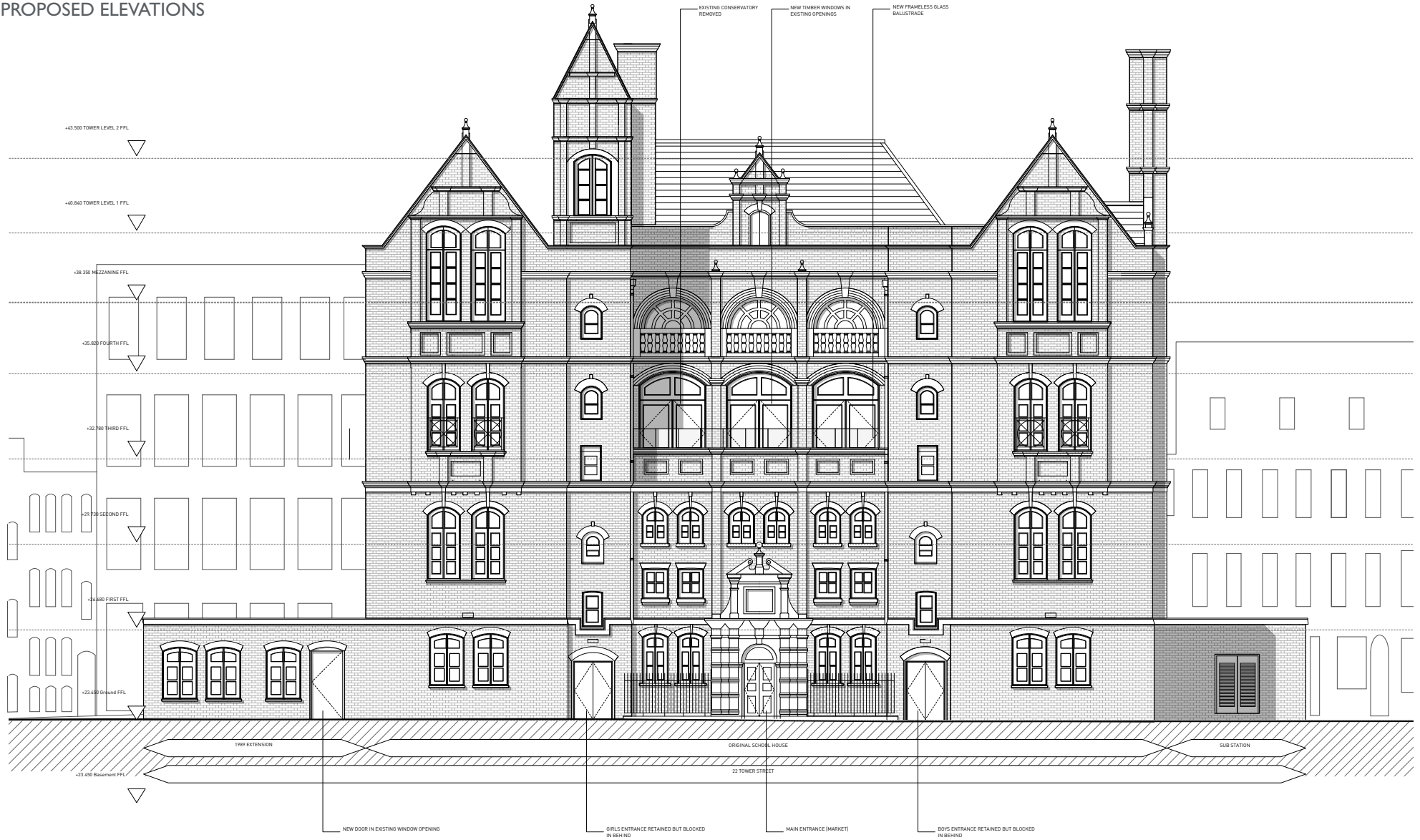


 Removed Fabric

ROOF PLAN - PROPOSED ALTERATIONS



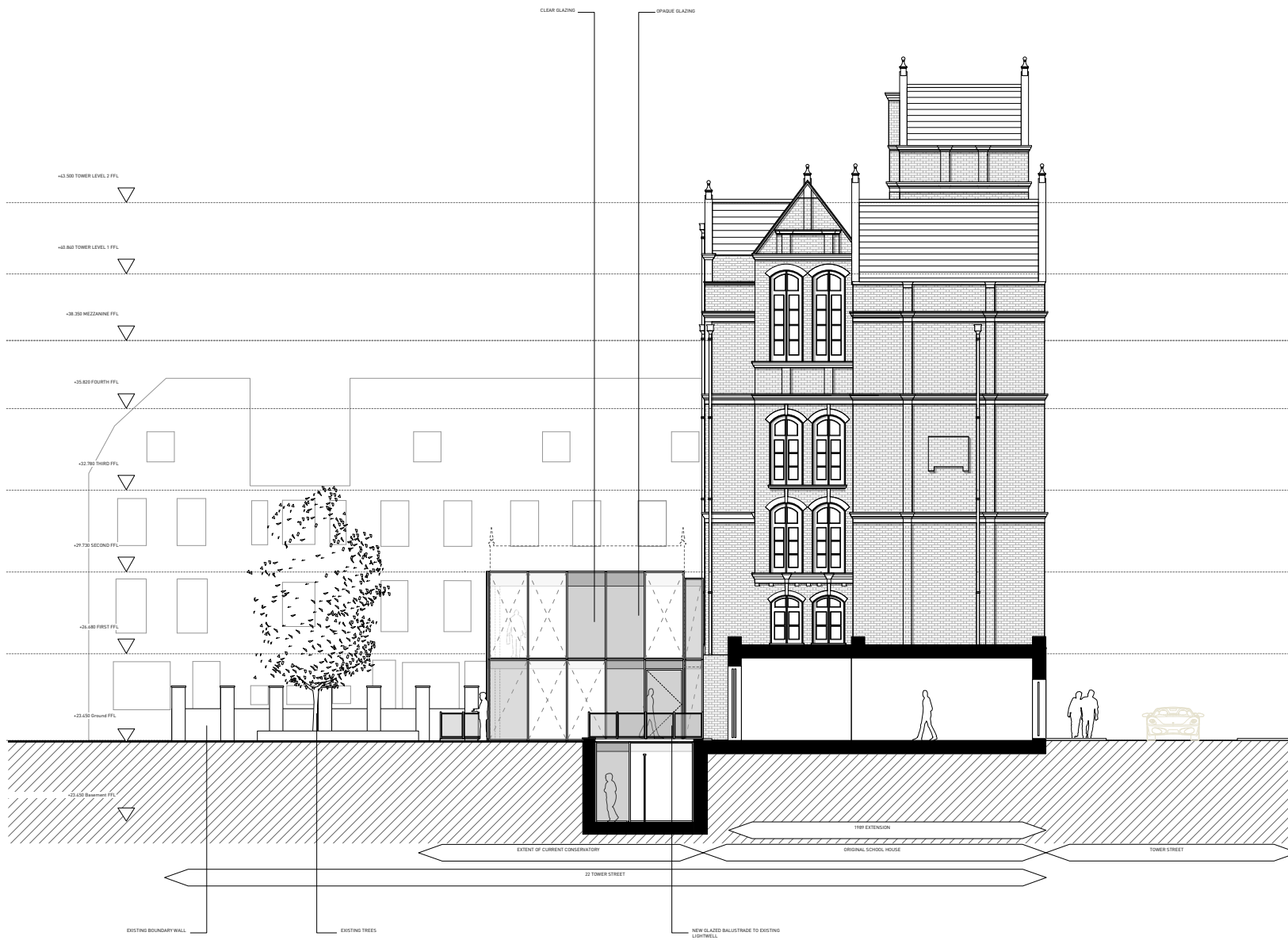
PROPOSED ELEVATIONS



Front Elevation



Rear Elevation



North-West Elevation



South-East Elevation

4.3 ASSESSMENT CRITERIA

In order to fully understand the effect of the impact of the proposed changes on the heritage value of no. 22 Tower Street, we have used criteria based on that recommended by ICOMOS. This defines, firstly, the “Level of Change” proposed and, secondly, the “Effect of Overall Impact”. This latter is in the form of a matrix setting the “Level of Change” against “Heritage Value” to determine the subsequent “Effect of Overall Impact”, ranging from “Neutral” to “Very Large”, either beneficial or adverse.

Whilst this methodology provides a degree of objectivity in assessing impact, in reality assessment is never a mechanical process and requires considerable professional judgement. Whatever methodology is used, therefore, some anomalies (particularly when using a matrix) are inevitable. This is because the impact of change on a particular heritage asset depends, to a considerable degree, on a wide range of issues which can differ significantly case-by-case.

The severity of change can be judged taking into account direct and indirect effect, whether the change is temporary or permanent, reversible or irreversible. The level of change is allocated without regard to the value (significance) of the asset. The table below clarifies what is meant by ‘Level of Change’ and is modified from guidance set out by ICOMOS.

LEVEL OF CHANGE	
Level of Change	Description
Major Change	Results in a substantial visual or physical change (ie loss of historic fabric) to the form, appearance or context of a heritage asset.
Moderate Change	Results in a significant visual or physical change (ie loss of historic fabric) to the form, appearance or context of a heritage asset.
Minor Change	Results in a some visual or physical change (ie loss of historic fabric) to the form, appearance or context of a heritage asset.
Negligible Change	Results in a negligible visual or physical change (ie loss of historic fabric) to the form, appearance or context of a heritage asset.
No Change	No visual or physical change to the heritage asset.

Once the heritage value (significance) or a heritage asset and the Level of Change exerted on it as a result of the development proposals has been understood, the two ratings can be combined to reach an overall impact rating according to the following formula:



The outcome of this process is detailed in the table below as set out by ICOMOS.

EFFECT OF OVERALL IMPACT (Adverse or Beneficial)					
SIGNIFICANCE/HERITAGE VALUE	No change	Negligible Change	Minor Change	Moderate Change	Major Change
Very High Value	Neutral Impact	Slight Impact	Moderate/Large Impact	Large/Very Large Impact	Very Large Impact
High Value	Neutral Impact	Slight Impact	Moderate/Slight Impact	Moderate/Large Impact	Large/Very Large Impact
Medium Value	Neutral Impact	Neutral/Slight Impact	Slight Impact	Moderate Impact	Moderate/Large Impact
Low Value	Neutral Impact	Neutral/Slight Impact	Neutral/Slight Impact	Slight Impact	Slight/Moderate Impact
Negligible Value	Neutral Impact	Neutral Impact	Neutral/Slight Impact	Neutral/Slight Impact	Slight Impact

4.4 IMPACT ASSESSMENT

The following section assesses the effect of overall impact of the proposed changes on the heritage significance of the site. The judgements are made based on the table provided in the previous section, which judges the Heritage Value against the assumed level of change. For clarity the impact of development on the site is broken down and addressed on a component by component basis starting with the House, and then broadening the overview to cover its curtilage (including views and landscape features) and then its wider setting and context.

Key Area of Impact	Heritage Value	Level of change	Overall Impact
Works to the exterior of the building			
Seven Dials Conservation Area and Listed Building within	<i>High aesthetic, communal and historic significance as a result of local designation.</i>	<p>Moderate level of change.</p> <p>Works proposed to the exterior of the building are largely beneficial in terms of impact on the conservation area and flanking Listed Buildings. These involve the removal of the unsympathetic rear conservatory and the conservatory 'Winter Garden' to the front elevation. The removal of the winter garden and replacement with an open balcony would reinstate the sense of the open colonnade shown on the original building plans.</p> <p>The existing rear conservatory would be replaced with a new conservatory on a more moderate scale. The new conservatory would allow more of the rear elevation to be visible than the present form including the full run of the second floor windows.</p> <p>The overall appearance of the building would be enhanced by the conservation and maintenance repair proposed as part of the overall works.</p> <p>In short the proposed scheme would preserve the monumentality of the former school building within its immediate streetscape providing enhancement through the removal of previous unsympathetic extension.</p>	<p>Moderate/Large beneficial impact through the removal of unsympathetic late 20th century extensions.</p> <p>This beneficial rating is modified to moderate as a result of the introduction of a new extension to the rear elevation which will be more sympathetic in its appearance to the historic structure.</p>
Tower Street elevation Grade II Listed (as a result of removed extensions).	<i>High aesthetic, communal and historic significance.</i>	<p>Minor level of change. The unsympathetic winter garden extension will be removed as part of the proposed programme of</p> <p>This extension is of poor design quality and detracts from the heritage value of the facade. Removal of this extension will essentially enhance the aesthetic quality of the elevation at the same time as revealing historic fabric which will be restored as part of the conservation programme.</p>	<p>Moderate/Slight beneficial impact.</p> <p>As a consequence of the removal of the second floor conservatory</p>

Key Area of Impact	Heritage Value	Level of change	Overall Impact
Rear elevation Grade II Listed (as a result of removed extensions).	<i>Medium aesthetic, communal and historic significance.</i>	<p>The beneficial value of the removal of unsympathetic 1980's conservatory extension will be tempered by the addition of a new extension on the approximate footprint of that existing. The extension is designed to be more discreet in its setting covering less of the rear elevation (both in terms of height and width) than that existing.</p> <p>The scale and massing of the proposed extension and the building materials used are designed to be subservient to the historic building to enhance rather than mask its historic characteristics. The level of change resulting from the introduction of new extension is considerably more discreet and less bulky than the existing more ornate extension, there for the level of change compared to the existing baseline is considered to be beneficial. Overall level of change moderate.</p> <p>New glazed balustrades will also be added to the light wells and new and reused openings through the elevation at ground floor level.</p>	Moderate beneficial impact when compared with improvement upon existing extension
Side elevations Grade II Listed	<i>Low aesthetic value</i>	<p>The only visual change to the south east elevation would be the insertion of a glass floor at ground floor level toward the Tower Street frontage which would necessitate the introduction of a new glazed balustrade.</p> <p>Conservation repair to the elevations will be discreet using like for like materials where appropriate and adopting a minimal intervention approach. As such the physical and visual impact of the repairs on the building will be kept to a minimum. A negligible visual level of change is therefore identified for the side elevations.</p>	Neutral/Slight beneficial impact in terms of the overall benefits of conservation repair.

Key Area of Impact	Heritage Value	Level of change	Overall Impact
Roof profile	<i>Medium historic value in terms of historic roof profile and visibility within the Conservation Area</i>	Negligible change	Neutral impact
Works to the interior of the Building			
Basement- spaces including arches	<i>Low heritage value</i>	<p>At basement level, the majority of the historic wall fabric will be retained within the developed scheme. The existing internal spaces are plain and modern in appearance featuring insertions such as suspended ceilings and service runs. The present scheme seeks to remove these intrusive elements. The key vertical circulation spaces are retained and respected at this level as are the under pavement arches/stores. The ceiling of the store at the south-west corner of the building will be opened to accommodate a glass ceiling to exterior ground floor. Inspection of historic plans shows that this location was formally occupied by a ramp leading from the ground floor street frontage to basement level. The proposal to insert a glass roof therefore reflects this historic openness and proves that the historic ceiling fabric to be removed is not historic in origin.</p> <p>Level of change moderate</p>	Slight beneficial impact

Key Area of Impact	Heritage Value	Level of change	Overall Impact
Ground to third floors	<i>Low heritage value in terms of surviving historic fabric and features. value.</i>	<p>Across ground to third floor levels, the majority of the historic wall fabric will be retained within the developed scheme. The existing internal spaces are plain and modern in appearance featuring insertions such as suspended ceilings and service runs. The present scheme seeks to remove these intrusive elements. The key vertical circulation spaces are retained and respected at this level through the retention of the 'girls' and boy's stair. The stair fabric itself (modern in origin) will be replaced with a lift within the northern stairwell, retaining the historic vertical circulation and emphasising the loose symmetry of the internal layout.</p> <p>The floor slabs across these floors have largely been replaced and are of modern origin. A number of modern partitions will be removed to facilitate reconfiguration of the spaces for residential use. This action seeks to open up the internal spaces enhancing the historic legibility of the room proportions which has been compromised by intensive sub division.</p> <p>Over all, the level of change across these floors is considered to be moderate.</p>	Slight beneficial impact
Fourth floor	<i>Low heritage value</i>	<p>The differentiating factor for the 4th floor is the presence of the exposed roof trusses within the internal floor space. The proposed scheme seeks to enhance the visibility of these trusses within the developed space; this will be done by allowing the large room spaces and roof void at this level below the roof truss to remain. Removal of partitions at this level is smaller in scale and seeks to introduce larger room spaces at the same time as removing modern fit out.</p> <p>The level of change in this area is considered to be minor.</p>	Neutral/Slight beneficial
Vertical Circulation	<i>Medium historic and aesthetic value</i>	<p>Staircases and stair shafts within the late 19th century building will be retained, repaired and re-used minimising additional impact on historic fabric as a result of the insertion of new vertical access. The level of change/intervention in these spaces is considered to be minor.</p>	Slight beneficial impact in terms of the positive effects of the retention of historic circulation.

5

CONCLUSION

The baseline assessment has identified that the heritage value of the building lies predominantly in the external appearance of the building which retains its characteristics as a 19th century school building of London origin. Modern extensions to the building have compromised the aesthetic quality of the building somewhat and the current proposals seek to enhance heritage significance through the removal of these extensions. Where extensions are to be replaced, the discreet design and scale of the proposed extensions remain subservient to the historic building allowing it to breathe within its urban context.

The interior of the building has been heavily modified over time, key alterations include the reformation of the original floor levels and the 1980's overhaul and fit out. Surviving historic features are rare comprising the surviving stair shafts to the boys and girls school entrances, the exposed roof trusses and the under pavement arches and stores and arches at basement level. All these features are retained and enhanced within the developed building.

The proposed design scheme has been evolved to focus on the retention of these features and to respond to concerns received from the Camden Conservation team both on site and in response to a request for pre-application advice (Refer Appendix B)

In short the proposed scheme seeks to retain and significantly enhance what is special about 22 Tower Street and its landscape setting through balancing a minimal intervention approach with the need to secure the longevity of the building. In general, the alterations to the building are believed to be beneficial.

General Sources

'Site of Marshland (Seven Dials)', Survey of London: volume 5: St Giles-in-the-Fields, pt II (1914), pp. 112-114. URL: <http://www.british-history.ac.uk/report.aspx?compid=74290>
Minutes of Proceedings, Volume 51. London School Board (1899)
Communities and Local Government, 2012, National Planning Policy Framework

English Heritage, 2008, Conservation Principles, Policies and Guidance

English Heritage, 2011, The Setting of Heritage Assets
Greater London Authority, 2011. The London Plan

Maps

Londinium Feracissimi Angliae c.1572.
Londini Angliae Regni Metropolis c. 190
Hollar's Map of London c1658
John Rocque's Map of London c1769
Ordnance Survey 1862-1872
Ordnance Survey 1934-40

Archive Documents (London Metropolitan Archives)

School Board for London - SBL/1920-1922: Buildings, Sites and Works
Tower Street School: Building Act Case File - GLC/AR/BR/34/002699

Planning Documents (Camden Borough Council References)

P14/60/6/30611 22 Tower Street, WC2 Alterations to car port and improved access to rear area, the demolition of a small rear outbuilding and erection of ground floor rear extension, together with the renovation of the railings enclosing the rear courtyard to Tower Court, including the landscaping of the courtyard. FINAL DECISION 30-05-1980 Conditional
P14/60/6/226 No.22 Tower Street HOLBORN Use for a limited period of part first floor of No.22 Tower Street HOLBORN for office purposes. FINAL DECISION 31-03-1959 Conditional
8970114 22 Tower Street WC2 Variations to listed building consent dated 2nd March 1989 (Reg.No. HB/8870186) including excavation of basement area beneath conservatory modifications to floor levels internal alterations and provision of a means of escape at the rear as shown on drawing numbers 1162N/100B 101B 102D 103C 104A 105B 106B 107 46F 47F 48F & 56B. FINAL DECISION 10-07-1989 Grant List.Build. or Cons.Area Consent

8900352 22 Tower Street WC2 Excavation of basement area below rear conservatory for office use and alterations to second/third floor 'winter garden' conservatory extension on Tower Street frontage as shown on drawing numbers 1162N/100B 101B 102D 103C 104A 105B 106B 107 46F 47F 48F & 56B. FINAL DECISION 10-07-1989 Grant Full or Outline Perm. with Condit.

8970022 22 Tower Street WC2 Approval of details pursuant to condition 03 (a) of listed building consent dated 2nd March 1989 (Reg. No. HB/8970022) as shown on drawings numbered 1162/45/J 43/C and 71. FINAL DECISION 03-02-1989 Grant Approval of Details (Listed Bldg)

8800456 22 Tower Street WC2 The erection of a single storey rear conservatory extension and the installation of a glazed "winter garden" at second/third level front elevation as shown on drawing numbers 1162/01 02 03 04 05 06 45A 46D 47C 48C 49A 50 51 & 52. FINAL DECISION 28-09-1988 Grant Full or Outline Perm. with Condit.

8870186 22 Tower Street WC2 1. External restoration of the building including the reinstatement of all missing features (ie. stone copings cappings and finials etc.) 2. The net addition of one floor between the existing first and third floors and modifications to the fenestration of the rear elevation to accord with it 3. The installation of a glazed "winter garden" at second/third level front elevation 4. A single storey conservatory extension at the rear as shown on drawing numbers 1162/01 02 03 04 05 06 45A 46D 47C 48C 49A 50 51 & 52. FINAL DECISION 28-09-1988 Grant List.Build. or Cons.Area Consent

8800002 22 Tower Street WC2 Alterations and refurbishment works including the excavation at basement level to provide additional floorspace the erection of a single storey side extension partly into the rear yard and the erection of a lift tower as shown on drawing numbers 1487/501A-509A. FINAL DECISION 04-01-1988 Grant Full or Outline Perm. with Condit.

8870001 22 Tower Street WC2 Alterations and refurbishment works including the excavation at basement level to provide additional floorspace the erection of a single storey side extension partly into the rear yard and the erection of a lift tower as shown on drawing numbers 1487/501A-509A. FINAL DECISION 04-01-1988 Grant List.Build. or Cons.Area Consent

8770161 22 Tower Street WC2 Alterations and refurbishment works including the erection of a full height rear extension. FINAL DECISION 07-05-1987 Decision Deferred Indefinitely

8700984 22 Tower Street WC2 Alterations and refurbishment works including the erection of a full height rear extension. FINAL DECISION 07-05-1987 Decision Deferred Indefinitely

P14/60/6/HB2455 22 Tower Street, WC2 Alterations to car port and improved access to rear area, the demolition of a small rear outbuilding and erection of ground floor rear extension, together with the renovation of the railings enclosing the rear courtyard to Tower Court,

including the landscaping of the courtyard. FINAL DECISION 30-05-1980 Listed Building Consent (Conditional)

9070142 22 Tower Street WC2 Insertion of gate to south east boundary railings. (Plans submitted). FINAL DECISION 02-08-1990 Withdrawn after Reg'n (not used on PACIS 9000375

22 Tower Street WC2 Insertion of gate to south east boundary railings. (Plans submitted). FINAL DECISION 02-08-1990 Withdrawn after Reg'n (not used on PACIS 9000314

22 Tower Street WC2 The provision of a second off-street car parking space as shown on drawing numbers 1162N/198.1 Rev C Appeal received against refusal. APPEAL DECIDED 16-07-1990 Refuse Full or Outline Permission

9070115 22 Tower Street WC2 Alteration involving the establishment of a second off-street car parking space omission of brick planter and installation of C.I. bollards and chain link guard. (Plans submitted). APPEAL DECIDED 28-06-1990 Withdrawn after Reg'n (not used on PACIS 9070077

22 Tower Street/2 Tower Court WC2 Approval of details of the proposed external metal balustrading at ground level pursuant to condition 03(c) of listed building consent dated 2nd March 1989 (Reg.No. HB/8870186). (Plans submitted). FINAL DECISION 29-03-1990 Grant Approval of Details (Listed Bldg)

9070068 22 Tower Street WC2 Approval of details of front railings to the windows at first second and third floor levels pursuant to additional condition 03(c) of consent granted on dated 2nd March 1989 (Reg.No.HB/8870186) for alteration and extension to the building. FINAL DECISION 23-03-1990 Grant Approval of Details (Listed Bldg)

9000112 22 Tower Street WC2 for use within Class B1 of the Town & Country Planning (Use Classes) Order 1987 as shown on site plan. FINAL DECISION 09-01-1990 S64 Det. - Not Dev. - Applic. not requ.

8970201 22 Tower Street WC2 Demolition of small extension and construction of LEB sub-station as shown on drawing number 1162N/198C revised by letter dated 11th May 1990. FINAL DECISION 30-11-1989 Grant List.Build. or Cons.Area Consent

8900614 22 Tower Street WC2 Demolition of the single storey structure and construction of LEB sub-station and the provision of one off-street car parking space and other minor alterations on south east corner of Tower Street frontage as shown on drawing number 1162N/198C revised by letter dated 11th May 1990. FINAL DECISION 30-11-1989 Grant Full or Outline Perm. with Condit.

8970175 22 Tower Street WC2 Approval of details of the external joinery (windows) pursuant to condition 03(d) of listed building consent dated 2nd March 1989 (Reg.No.HB/8870186) as shown on plans numbered 1162N/143B 143D 144A 144D 145A 145C 146A 146B 163B 163E 164A 164C 165 and 165A. FINAL DECISION 31-10-1989 Grant Approval of Details (Listed Bldg)

2011/3525/T 22 Tower Street London WC2H 9NS WITHIN THE COURTYARD: 1 x Rowan/

Ash Mountain - Fell to ground level. FINAL DECISION 19-07-2011 No Objection to Works to Tree(s) in CA

2010/5790/L 22 Tower Street London WC2H 9NS Replacement of existing windows to the third and fourth floor level of Tower street elevation with new timber windows (Class B1a) FINAL DECISION 28-10-2010 Granted

2010/5787/P 22 Tower Street London WC2H 9NS Replacement of existing windows to the third and fourth floor level of Tower street elevation (Class B1a) WITHDRAWN 28-10-2010 Withdrawn Decision

2010/4818/T 22 Tower Street London WC2H 9NS SIDE GARDEN, FRONTING TOWER COURT: 2 x Whitebeam - Reduce and reshape by approx. 25%. Clean out crown and ensure 1m clearance from lamp post. FINAL DECISION 09-09-2010 No Objection to Works to Tree(s) in CA

LS9805034 22 Tower Street, WC2 Internal partitioning to lower ground, third and fourth floors, as shown on drawing numbers 1662N/135D, 1193A/01 to /05. FINAL DECISION 02-11-1998 Grant L B Consent with Conditions

TC9806659 22 Tower Street London WC2H Reduction works to one Rowan and one Whitebeam in rear garden. FINAL DECISION 23-07-1998 No objection to works-TCA-Council spec

9470326 22 Tower Street WC2 Alterations to provide new internal partitioning to 4th floor including high level glazing, as shown on drawing numbers 1193/2/2 5 6 8. FINAL DECISION 02-11-1994 Grant List.Build. or Cons.Area Consent

9270123 22 Tower Street WC2 Installation of internal partitions to fourth floor including high level glazing as shown on drawings nos. 1193/67A 68A and 1162N/135D. FINAL DECISION 29-06-1992 Grant List.Build. or Cons.Area Consent

9170192 22 Tower Street WC2 The installation of external security bars to ground floor and basement windows as shown on drawing nos. 1193/51 52 53 54B and 1162N/135D. FINAL DECISION 21-10-1991 Grant List.Build. or Cons.Area Consent

9101157 22 Tower Street WC2 The installation of external security bars to ground and basement windows as shown on drawings nos. 1193/51 52 53 54B and 1162N/135D. FINAL DECISION 21-10-1991 Grant Full or Outline Planning Permissn.

Websites

- <http://www.westminster.gov.uk/services/environment/planning/> (accessed 14 February 2013).
- www.british-history.ac.uk (accessed February 2013).
- The National Heritage List for England, <http://list.english-heritage.org.uk/> (accessed 14 February 2013).
- www.london1878.com/stanford19.htm

APPENDIX B: LISTING DESCRIPTION

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: No name for this Entry

List Entry Number: 1379048

Location

22, TOWER STREET

The building may lie within the boundary of more than one authority.

County: Greater London Authority

District: Camden

District Type: London Borough

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 15-Jan-1973

Date of most recent amendment: Not applicable to this List entry.

Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 478414

Asset Groupings

This List entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List Entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details

CAMDEN

TQ3081SW TOWER STREET
798-1/105/1653 (North East side)
15/01/73 No.22

GV II

Board School, now converted to offices. c1874, altered late C20. Yellow stock brick with red brick and stone dressings. Steep slated roofs with gabled end bays, tall brick chimney-stacks and parapets.

EXTERIOR: mainly 4 storeys. Not quite symmetrical composition of 2:1:3:1:2 windows with projecting end bays; 5 storey bell tower bay to left of entrance. Moulded floor strings. Central 3 bays divided by pilasters supporting a parapet of blind panels; 3rd and 4th floors set back with late C20 glazed wall and curved roof below original lunettes. Main central entrance with stucco doorcase of paired banded pilasters carrying an entablature and rectangular overdoor with pilasters, flanked by ball finials, supporting a scrolled pediment with ball finial; round-arched doorway with panelled door and fanlight. Most windows round-arched with keystones; those flanking overdoor have gauged brick flat arches. 4th floor left hand bay, window with apron of 3 carved stone plaques with floral and foliar enrichment and inscribed "For LSB"; left hand bay, window with similar apron inscribed "1874". Right hand return has chimney-stack rising full height of building with 2 pedimented features. To left of chimney at 3rd floor height, a carved stone plaque, in rubbed red brick surround, depicting an angel showing a book to 2 young children.
INTERIOR: altered.

Listing NGR: TQ3002081034

Selected Sources

Legacy Record - This information may be included in the List Entry Details.

Map

National Grid Reference: TQ 30013 81044

The below map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF - [1379048.pdf](#)

http://list.english-heritage.org.uk/resultsingle_print.aspx?uid=1379048&showMap=1... 22/05/2014



© Crown Copyright and database right 2012. All rights reserved. Ordnance Survey Licence number 100019088.

© British Crown and SeaZone Solutions Limited 2011. All rights reserved. Licence number 102006.006.

This copy shows the entry on 22-May-2014 at 01:32:16.

http://list.english-heritage.org.uk/resultsingle_print.aspx?uid=1379048&showMap=1... 22/05/2014

APPENDIX C: RESPONSE TO PRE- APPLICATION ENQUIRY

Date: 28 April 2014
Ref: 2014/1670/PRE
Contact: Ben Le Mare
Direct Line: 020 7974 1278
E-mail: ben.lemare@camden.gov.uk



**Development Management
Planning Services**
London Borough of Camden
Town Hall
Argyle Street
London WC1H 8ND

Tel 020 7278 4444
Fax 020 7974 1975
planning@camden.gov.uk
www.camden.gov.uk/planning

Mr Chris Plenderleith
Leith Planning Limited
14 South Clifton Street,
Lytham
Lancs
FY8 5HN

Dear Chris

**Town and Country Planning Act 1990 (as amended)
Pre-app enquiry for 22 Tower Street, London, WC2H 9NS**

I refer to your pre-application documents which were submitted on 5th March 2014 and our subsequent meetings that were held on 27th March and 10th April (on-site) in respect of the above mentioned site.

The meeting was held under this Council's procedure for pre-application meetings to discuss the following development proposal:

Change of use from offices (B1a) to 24 residential units (C3) with associated side, front and rear extensions, following the demolition of existing conservatory.

This letter provides a written appraisal of the scheme following our meeting and number subsequent internal discussions between council officers and senior managers.

Planning policy context

The main policy context for the proposals is the London Borough of Camden Local Development Framework Core Strategy and Development Policies (2010), Camden Planning Guidance 1 – 5 (2013) and 6 – 8 (2011).

As the building is listed and located within the Seven Dials (Covent Garden) Conservation Area, consideration needs to be given to the Seven Dials Estate Conservation Area Statement (1998).

In addition to the above, consideration should be given to the policies set out in the National Planning Policy Framework (2012) and the London Plan (2011).

Planning issues

Having regard to the scheme illustrated and the matters discussed during the meeting, the main issues of contention relate to the following:

- Land use;
- Affordable housing, mix of units / quality of the accommodation;
- Design / visual impact;
- Impact on neighbouring amenity;

Land use

- The building is located within the Central London Zone (CLZ), which following a successful challenge submitted by LB Camden to central government has been excluded from Class J of the GDPO (permitted development for B1a offices to C3 residential conversions). The government therefore recognises the importance which the existing employment floorspace within the CLZ contributes to both the London economy and National economy.
- In areas outside of the CLZ the LB Camden is losing a large amount of B1a office floorspace to higher value land uses, i.e. market residential dwellings. There are significant concerns of the impact which this will have on local employment opportunities for Camden residents. Policy DP13 of the LDF states that the Council will retain buildings that are suitable for continued business use and will resist a change to non-business use unless it can be demonstrated that the site is no longer suitable for its existing business use and there is evidence that the possibility of re-using or redeveloping the site for alternative business use is not viable.
- I understand that information on marketing/suitability of the building as offices is currently being prepared by a qualified surveyor, however nothing has been provided to date. Camden's Economic Development Team are of the view that building offers the potential for providing accommodation for small and medium sized businesses. Therefore the council would expect for the building to remain in office use unless very persuasive evidence is submitted with application to demonstrate that there is no demand or that the building is unsuitable for continued office use.
- Whilst the building is Grade II listed, this is not considered to be restrictive in terms of upgrading the accommodation as little of its historic internal features have been retained. The building also has high floor to ceiling heights, lifts, and level access from street which make it suitable for continued business uses.

Notwithstanding the clear land use policy objections, the merits of the proposed residential conversion and associated extensions/alterations are discussed below.

Affordable housing, mix of units / quality of the accommodation

- The Council expects affordable housing and market housing to form integral parts of each development. Policy DP3 states that the Council will expect all residential developments with a capacity for 10 or more additional dwellings or 1000sqm of floorspace Gross External Area (GEA) to make a contribution to the supply of affordable housing. The percentage target is 10% where there is capacity for 10 homes and an additional 1% per additional home capacity. Given that the current

proposal would provide 24 new units of accommodation the Council would seek to secure around 24% of the floorspace for affordable housing. The layout of the building lends itself to providing affordable housing units on-site. This is attributed to the separate entrances and key fob access arrangements which could be incorporated into the scheme. Careful consideration needs to be given to the guidance on affordable housing set out in CPG2.

- DP5 states that the council will "expect a mix of large and small homes in all residential developments" and contribute to meeting the Council's dwelling size priorities. Whilst the proposals include the provision 1-bed and 2-bed units, the Council require for all new development of this size to make provision for some family housing (3 / 4 bed). In terms of market housing, 40% of these units should be 2-bed units as these are identified by policy DP5 as high priority.
- The London Plan requires that all new self-contained apartments should satisfy the minimum areas for overall floorspace and it is recognised that all of the proposed units would achieve this requirement. It terms of the layout and quality of the accommodation I have concerns with the proposed inclusion of units being solely located in the basement as these would not benefit from acceptable levels of light or outlook. Furthermore, the plans show that a kitchen/living room in the basement would not have any windows or ventilation. This would not be acceptable in planning policy terms and under building regulations.

Design

- The building has undergone numerous changes over the years from its original use as a Board School. The most evident of these changes is the current office layout dating from the 1980s which appears to have resulted in the removal of most of the historic fabric and the insertion of unsympathetic mezzanines.
- A conservation consultant has been employed who is producing a heritage statement to identify the significance of the building and its components. Once this has been produced (even in draft form) it would be useful for council officers to be able to view it. Therefore, based on the information submitted so far only very general advice can be provided regarding the impact on the listed building and the conservation area.
- The site is in an Archaeological Priority Area and therefore the proposed excavation and construction may impact on this. You are advised to speak to Greater London Archaeological Advisory Service at English Heritage regarding the implications of this.
- There is no objection in principle to the subdivision of space to form residential units given the extent of alterations that have already taken place to the building. Whilst the preservation of internal historic masonry walls is welcomed concerns are raised regarding the proposed layout which in places has been designed to impose a residential layout rather than working around historic features.

- Although the staircases themselves are non-original the stairwell and full height space is original and an important element to the building's interest in representing the original means of circulation. Therefore the removal of the stair and insertion of floor plates in these spaces harms the original form of the building. Given that these areas appear to be one of the few surviving features of the building they take on added significance. The works would not be reversible as they are a significant structural intervention.
- On the fourth floor the extent of partitioning and mezzanine floors proposed is excessive and harms the appreciation of the historic roof structure which is of interest. Whilst carefully located mezzanines could be acceptable in the side wing the central space should be left fully exposed with low level partitioning.
- There is no objection to the loss of the existing front conservatory at third floor level which encloses the original terrace. However the proposed replacement enclosure which has a greater level of solidity is not appropriate. As this space is to be used as bedrooms the need for greater shading is understood, however this use also created problems in terms of integrating the room into a flat which then necessitates the removal of the adjacent stair, insertion of a solid dividing partition and removal/covering over of the original window openings and soldier course. This space would be better used as either outdoor space (with the removal of the conservatory) or perhaps as a winter garden.
- The rear conservatory is a dated and unsympathetic addition to the building and therefore its removal would be welcomed. Proposals show a replacement structure of a similar scale and massing but with a contemporary appearance. Whilst there is an existing structure there it does not imply that a replacement structure of the same bulk and massing would be acceptable. The rear of the building is visible from Tower Court so the opportunity should be taken to replace it with a more inconspicuous and smaller structure. A modern design raises no objection as a historic replica would appear under-scaled and alien. Given the design approach taken a simpler form than the tiered option proposed would work better. A building which is largely detached (in a similar manner to the existing conservatory) from the school building would also better reveal the rear façade of the school. It should be demonstrated how the massing of the building has been considered in views from Tower Court to improve the appearance of the building rather than being justified on a simple like for like replacement of bulk.
- Early designs proposed for the extension showed details such as lining through an exposed floor plate with the school's external string course which gives a degree of subtle unity with the school building. The current design uses features a high level of glazing with gives its subservient appearance. A degree of solidity is proposed also, presumably for privacy and to avoid solar gain, which is not objectionable. The proposed "solid" panels (on later images e-mails) are in a reflective and corrugated metal. I am not convinced by this which gives it a more industrial aesthetic and alternative materials which are tonally closer to the brickwork might work better.

- The building is almost perfectly symmetrical on the Tower Street elevation and although a single storey extension has been added to the side this has not significantly eroded from this. An additional storey on top of this would erode the symmetry of the building and also diminish the strong vertical emphasis of the gabled left hand bay. It is advised that this element of the proposals would not be acceptable.

Impact on neighbour amenity

- The main area of contention on this issue appears to be potential overlooking between the proposed residential units and windows serving habitable rooms on the northwest side site. The design of new development therefore needs to give careful consideration to the windows which face into the site.

Legal Obligations

- The council would require an on-site contribution towards affordable housing. The provision of affordable housing would be secured through a clause in an s106 legal agreement. As the proposal is a major development, the following heads of terms as part of a s106 agreement are likely to be required:

- Delivery of affordable housing;
- Car-free housing;
- Construction Management Plan;
- Public Open Space;
- Education contribution;
- Transport / highways contribution;
- Sustainability / Energy Plan;
- Local procurement.

Other matters

Planning Performance Agreement

- Given the nature of the site and scale of the proposed development which could be feasible be accommodated you are strongly encourage to enter into Planning Performance Agreement (PPA) with the Council. A PPA does not give any guarantees as to the outcome of a planning application. It is purely to assist the project management and process of communication between the Council and the applicant and builds in added flexibility to properly address any issues or problems prior to the Council making its decision.
- Should you wish to enter into a PPA please contact the advice and consultation team for more details. Please note that the basic cost for a PPA is £5,000 and initial submissions can be made via the Council's website at the following link:
<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/pre-planning-application-advice/>
- It should be noted that fee for PPA does not include any future pre-application meetings with the Council, these are charged at the rates shown on our website.

Planning Application Submission

- When making an application in the future please ensure that you submit all the required information in accordance with the validation checklist. I have provided a checklist below for your convenience. More details can be obtained from our website by logging on to www.camden.gov.uk.

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision. If you (the applicant or their representative) have drafted any notes of the pre-application meeting held with the Council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

If you have any queries about the above letter please do not hesitate to contact me on 020 7974 1278.

Kind regards

Yours sincerely

Ben Le Mare MTCP MRTPI
Senior Planning Officer

Planning Obligations under Section 106 of the Town and Country Planning Act 1990

Following our preliminary assessment of your proposal, if you submit a planning application which addresses outstanding issues detailed in this report satisfactorily, officers would only consider recommending the application for approval subject to completion of a Section 106 agreement covering the following head(s) of terms.

Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its compliance	Yes
Affordable Housing	Yes
Public Open Space Contributions	Yes
Education Facilities and Contributions	Yes
Healthcare Facilities and Contributions	No
Car Free	Yes
Public Transport/Public Realm Improvements & Highways	Yes
Green Travel Plan	No
Service Management Plan	Maybe
Construction Management Plans	Yes
Town Centre Management	No
Sustainability Plan (BREEAM/Code for SH)	Yes
Energy Plan	Yes
Community facilities	Yes
Local employment (e.g. construction jobs recruitment, training and employment contribution)	Yes
Local procurement	Yes
Public Art	No

Supporting Statements and other information required for a valid application

To submit a valid planning application you would need to provide all the information and plans set out in the attachment to this letter. In addition, you should submit the following statements, showing how far your proposal meets Camden's policies and guidance (see attached guidance notes for further information):

Design and Access statement (including 'lifetime homes', crime impact and wheelchair housing)	Yes
Affordable housing statement (including Viability assessment if less than 50% affordable housing is proposed)	Yes
Air Quality assessment	Yes
Archaeological assessment	No
Contamination report	No
Construction Management Plan	Draft CMP is recommended
Daylight/sunlight assessment	No
Development phasing plan	No
Ecological survey	No
Energy/renewable energy statement	Yes
Environmental Statement/Impact Assessment	No
Floorspace Schedule (including full break down of residential mix by number of bedrooms and tenure)	Yes
Light impact statement	No
Listed building/Conservation Area/Historic Gardens appraisal	Yes
Noise Impact assessment (e.g. Acoustic report for plant)	Yes
Photographs/photomontages	Yes
Planning Statement	Yes
PPS 5 Justification (for demolition in Conservation Area)	Yes
Public Open space assessment	No
Regeneration/Community facilities assessment (re. loss of pub)	No
Retail impact assessment	No
Service Management Statement (including waste storage/removal)	Yes
Sustainability Statement (including CSH and BREEAM pre-assessments)	Yes
Transport Assessment	No
Transport Statement	Yes