



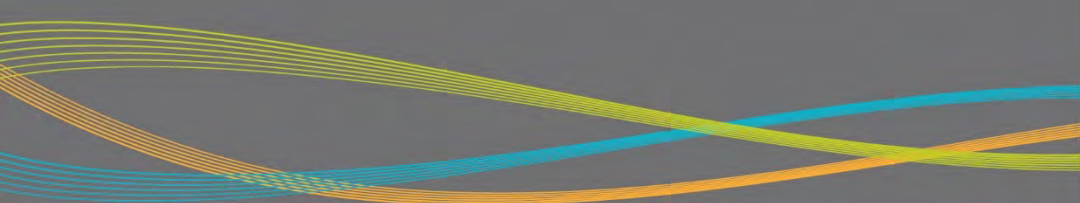
**2 Tower Court,  
London**

**Heritage Impact  
Assessment**

Prepared by:  
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On behalf of:  
**British Retail  
Consortium**

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**Appendix EDP 1** Plans, Elevations and Images Showing the Proposals  
(Drawing Number 18010\_GA.50 10.04.19)

## Plan

**Plan EDP 1** Location of Site and Heritage Assets Discussed in the Text  
(edp5207\_d003a 15 April 2019 LB/EO)

*This version is intended for electronic viewing only*

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## Section 1 Introduction

- 1.1 This Heritage Impact Assessment (HIA) has been prepared by The Environmental Dimension Partnership Ltd (EDP), on behalf of British Retail Consortium, to accompany the submission of a planning application and Listed Building Consent (LBC) for development at 2 Tower Court, London.
- 1.2 The HIA has been prepared in accordance with guidance set out in the *National Planning Policy Framework* (NPPF; 2019), i.e. paragraph 189, which advises that:
- “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*
- 1.3 The site (**Plan EDP 1**) includes a single building, considered to be listed by curtilage, and this HIA presents an assessment of potential impacts arising from the proposed alterations to the building, in relation to its ‘*special architectural or historic interest*’.
- 1.4 The site is also located within the Seven Dials Conservation Area and as such, the report presents an assessment of potential impacts on its character and appearance.
- 1.5 In so doing, this HIA addresses the requirements of current legislation and relevant national and local planning policies providing for the conservation and management of the historic environment, most notably paragraph 189 of the NPPF.

### Location and Boundaries

- 1.6 The site is located within the Seven Dials area of Covent Garden, in the London Borough of Camden at National Grid Reference (NGR) 530035, 181017.
- 1.7 The site occupies a rectangular plot of land and boundaries comprise Tower Court to the east, whereby the building directly fronts the alleyway, the courtyard of 22 Tower Street to the south, and buildings to the north.
- 1.8 The site comprises the building of 2 Tower Court, which currently sits within the curtilage of 22 Tower Street and surrounding gardens/hard landscaping. Photographs of the site and its situation are provided in **Images EDP 1 - 11**.

- 1.9 A plan, showing the arrangement of the site and wider area is included in **Plan EDP 1**.

#### **Previous Planning History**

- 1.10 A number of historic applications relating to the site were found on the Camden Planning pages, although by far the most extensive of these were confined to the years 1987-1990. During this period the building was divided up internally and the front conservatory was added, together with the enlargement of the existing basement.

- 1.11 Key planning applications during this period are:

- 8800250 – Approval of details of design of conservatory pursuant to additional condition 02 of the planning permission (PL/8703525/R1) dated 20 January 1988. (APPROVED); and
- The 2008/0926/P – Erection of single storey rear extension to office, following demolition of existing conservatory. (APPROVED – not implemented).

#### **Proposed Development**

- 1.12 The proposed development comprises the refurbishment of the building and alterations to reinstate the building into residential use. More details are provided in **Section 5**.
- 1.13 Plans and elevations of the proposed development are included in **Appendix EDP 1**, which should be consulted for further information.

## Section 2 Legislation and Planning Guidance

- 2.1 This section sets out relevant legislation and planning policy, governing the conservation and management of the historic environment.

### Legislation

- 2.2 The *Planning (Listed Buildings and Conservation Areas) Act 1990* is the primary legislative instrument addressing the treatment of listed buildings through the planning process in both England and Wales.

- 2.3 Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act of 1990* sets out the statutory duty of the decision-maker, where proposed development would affect a listed building or its setting:

*“...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.*

- 2.4 The ‘special regard’ duty of the 1990 Act has been tested in the Court of Appeal and confirmed to require that ‘*considerable importance and weight*’ should be afforded by the decision maker to the desirability of preserving a listed building, along with its setting. The relevant judgement is referenced as *Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage and National Trust* (2014) EWCA Civ 137.

- 2.5 However, it must be recognised that Section 66(1) of the 1990 Act does not identify that the local authority or the Secretary of State must preserve a listed building or its setting; neither does it indicate that development that does not preserve them is unacceptable and should therefore be refused.

- 2.6 This point is made very clearly in paragraph 54 of the High Court judgement in respect of *Forest of Dean DC v Secretary of State for Communities and Local Government* [2013] EWHC 4052 (Admin), which sets out that:

*“...Section 66 (1) did not oblige the inspector to reject the proposal because he found it would cause some harm to the setting of the listed buildings. The duty is directed to ‘the desirability of preserving’ the setting of listed buildings. One sees there the basic purpose of the ‘special regard’ duty. It does not rule out acceptable change. It gives the decision-maker an extra task to perform, which is to judge whether the change proposed is acceptable. But it does not prescribe the outcome. It does not dictate the refusal of planning permission if the proposed development is found likely to alter or even to harm the setting of a listed building”.*

- 2.7 In other words, it is up to the decision-maker (such as a local authority) to assess whether the proposal which is before them would result in ‘*acceptable change*’.
- 2.8 Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act* of 1990 sets out the statutory duty for a decision-maker where a proposed development would have an impact on the character or appearance of a conservation area. This states that: “...with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.
- 2.9 The ‘*special attention*’ duty of the 1990 Act has been tested in the Court of Appeal and confirmed to require that ‘*considerable importance and weight*’ should be afforded by the decision maker to the desirability of preserving or enhancing listed buildings. The relevant judgement is referenced as *Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage and National Trust* (2014) EWCA Civ 137.
- 2.10 As far as Section 72(1) of the Act is concerned, it has previously been established by the Courts (*South Lakeland DC v Secretary of State for the Environment*, [1992] 2 WLR 204) that proposed development which does not detract from the character or appearance of a conservation area is deemed to be in accordance with the legislation. In other words, there is no statutory duty to actively ‘*enhance*’.
- 2.11 Equally, it must be recognised that Section 72(1) of the 1990 Act does not identify that the Local Planning Authority or the Secretary of State must preserve or enhance the character or appearance of a conservation area; neither does it indicate that a development that does not ‘*preserve or enhance*’ is unacceptable and therefore should be refused.
- 2.12 Again, it is clearly up to the decision-maker (such as the local authority) to assess whether the development proposal before them would result in ‘*acceptable change*’.

### **National Planning Policy**

- 2.13 National planning guidance for England is set out in the NPPF, where Section 16 *Conserving and Enhancing the Historic Environment* sets out national planning guidance of relevance here.
- 2.14 In terms of an application, paragraph 189 states that:

*“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require*

*developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*

2.15 Paragraph 192 of the NPPF is of interest and relevance here:

*“In determining applications, local planning authorities should take account of:*

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.”*

2.16 In terms of the decision-making process, paragraph 193 states that:

*“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

2.17 Paragraph 194 then states that:

*“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

2.18 Paragraph 196 then adds the following in respect of the identification of harm assessed to be ‘less than substantial’: *“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, where appropriate, securing its optimum viable use.”*

2.19 It is concluded to be highly unlikely that development proposals for the site would result in impacts equating to ‘substantial harm’ (e.g. paragraph 195 of the NPPF).

### **Local Planning Policy**

- 2.20 The relevant Development Plan comprises Camden Council's Local Plan (which was adopted on 03 July 2017).
- 2.21 The policy of relevance to the proposals is Policy D2, which covers the Historic Environment and sets out the following:

*"The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.*

### **Designated Heritage Assets**

*Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

*The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.*

### **Conservation Areas**

*Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:*

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*



- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*

### **Listed Buildings**

*Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:*

- i. resist the total or substantial demolition of a listed building;*
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- k. resist development that would cause harm to significance of a listed building through an effect on its setting."*

- 2.22 The legislation, plans and policies identified in the paragraphs above have been considered in the preparation of this report.

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## **Section 3**

### **Methodology**

- 3.1 This section of the HIA outlines the methodology that was employed in the identification and assessment of potential impacts.

#### **General Methodology**

- 3.2 This HIA has been prepared in accordance with the *Standard and Guidance for the Archaeological Investigation and Recording of Standing Buildings or Structures* (CIfA, 2014).
- 3.3 These best practice professional guidelines provide a national standard for the completion of assessments addressing the built aspects of the historic environment.
- 3.4 A range of background sources was collected from relevant repositories, after instruction, in order to investigate and understand the origins and development of the site and the buildings within it. The repositories included:
- The National Heritage List for England (curated by Historic England); and
  - Camden Local Studies Library.
- 3.5 Having collected, collated and considered the background sources, the site and buildings were visited by an experienced surveyor, specialising in the investigation and assessment of standing buildings. This took place in November 2018.
- 3.6 In each case, the objectives were to understand the buildings' special interest, identify any features of special interest which they possess and consider any evidence for chronological change which might affect that special interest, in order to understand the likely impact of the development proposals.

#### **The Assessment of the Buildings' Special Interest**

- 3.7 Reference is made (where appropriate) to English Heritage (2008) *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment* in this assessment, but the identification of 'significance' will be based on the definition outlined in Annex 2 of the NPPF (as follows):

*"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For*

*World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."*

- 3.8 So, the '*special interest*' of the listed building within the site may be *archaeological, architectural, artistic or historic*.

### **The Assessment of 'Setting'**

- 3.9 The identification and assessment of potential impacts follows the 'stepped' approach set out in Historic England *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*, which was published in December 2017. This best practice guidance is hereafter referenced as GPA 3 or HE (2017).
- 3.10 This 'stepped' approach to the identification of developmental effects in respect of 'setting' can be summarised as follows:
1. Identify which heritage assets and their settings are affected;
  2. Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
  3. Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
  4. Explore ways to maximise enhancement and avoid or minimise harm; and
  5. Make and document the decision and monitor outcomes.
- 3.11 It should be noted that Steps 1 to 4 will be covered in this assessment; however, Step 5 is the remit of the decision-maker and beyond its scope.
- 3.12 Accordingly, this HIA has been prepared using best practice professional guidance and is therefore considered to provide a robust basis for an evaluation of the development which is proposed at the site, in respect of heritage matters.

## Section 4 Relevant Heritage Assets

- 4.1 The following section identifies the heritage assets which are capable of being affected by the site's proposed redevelopment.
- 4.2 Thereafter, there is a more detailed analysis of the baseline position for each of these heritage assets, outlining evidence for their chronological development, before then assessing their significance and any contribution made to that significance by their setting (where relevant).

### Listed Buildings Within the Site

- 4.3 Number 2 Tower Court is not in itself listed, although it is considered to be listed by curtilage due to its association with the adjacent Grade II listed 22 Tower Street. As such, the proposals involve direct or physical changes to 2 Tower Court, and changes within the setting of 22 Tower Street.

### Tower Court

- 4.4 Number 2 Tower Court is a three-storey building with basement. It is built from gault brick with red brick window detailing and quoins. It is of two bays, with entrance to left and gable projecting to the right. The gable end itself is shaped and curved with a brick coping (**Image EDP 1**). There is a modern conservatory on the ground floor covering the entrance, which was constructed as part of alterations in the late 1980s (see **Section 1** for planning history). There are modern railings on the windows of the upper floors.
- 4.5 The interior of the building is of a simple plan, with a staircase section leading into two rooms on each level. None of the rooms have any notable interior features (e.g. **Images EDP 2-6**).
- 4.6 The basement level has been dug out beneath the conservatory above, being an enlargement of a former lightwell but now enclosed to form a larger basement room.
- 4.7 Number 2 Tower Court is referred to as the 'School House' on a 1987 application, and 'School Keepers House' on a 1985 drainage application, thus clearly has an association with the school. The building does appear on the first Ordnance Survey plan to show the adjacent school (1895), although a building in this location is marked on earlier plans, suggesting that this may pre-date the school, or that there was an earlier building on its footprint. Nonetheless, it does appear that it was utilised as accommodation for school staff, thus having an historical relationship with the school.
- 4.8 The significance of 2 Tower Court lies predominantly in its architectural interest. This interest lies within the modest architectural features including the curved gable; otherwise

the building is rather plain in its architectural detailing and there is little artistic interest. The 1980s conservatory projection is of poor quality PVC and currently makes a negative contribution to the buildings significance by detracting from the experience of the main frontage of the building. The window bars also make a negative contribution. Its historic interest stems from its relationship with the school building and its related functional role. There is no evidence for any archaeological interest.

- 4.9 Although considered to be listed by curtilage, it is recognised that this does not necessarily mean that it contains the same heritage value as a Grade II listed building. Considering its diminutive style, and plain architectural detailing, which is well represented in the wider area, it is considered that the building has heritage value at the local level.

### **Seven Dials Conservation Area**

- 4.10 The site lies within the southern part of Seven Dials Conservation Area. It was first designated in 1971 and extended on three occasions in 1974, 1991 and 1998. A Conservation Area Statement (CAS) was prepared and adopted in 1998.
- 4.11 The CAS divides the conservation area into three sub-areas, with the site lying in Sub-Area 1, which was the area covered under the initial designation in 1971. This notes that the area has a distinctive radial plan of streets, developed by Thomas Neale at the end of the 17<sup>th</sup> century.
- 4.12 In terms of character, the CAS highlights the range and mix of building types and uses, and that the character is not dominated by one particular period or style of building. It notes that it is *“their combination that is of special interest”*.
- 4.13 The CAS then defines the character of the areas on a street-by-street basis. It describes Tower Court, noting it *“as a pleasant narrow pedestrianised street lying between Tower Street and Earham Street, smaller in scale and height than the surrounding streets with a terrace of attractive late 18th century three storey houses”*. It also specifically mentions the ‘unusual’ element of the railings and brick wall on the western side of Tower Court, which are noted as *‘New Materials and Street Features’*, which enhance the conservation area.
- 4.14 It also describes Tower Street as being *“dominated by warehouse buildings and the old Board School. The 19th century school is yellow stock brick with red brick and stone dressings and has been converted into offices. Nos.4-10 was built in 1878 and is a four-storey brick building with rendered string courses and tripartite sash windows”*.
- 4.15 No mention is made specifically of 2 Tower Court, nor is there any mention of the later conservatory addition to 2 Tower Court in terms of its contribution to the conservation area. However, it is clearly a negative feature as the current PVC materials are failing, and subsequently the use of this poor-quality material has a detrimental impact on the appearance of the conservation area.

- 4.16 Overall, the modern amendments and features that incorporate poor quality materials have a negative influence on 2 Tower Court, which would otherwise make a positive contribution to the conservation area.

### Listed Buildings Beyond the Site

- 4.17 There are three listed buildings in the immediate vicinity, which have the potential to be affected by the proposals in terms of changes within their setting, these being 22 Tower Street (**1379048**), 5-8 Tower Court (**1379041**) and 10 Tower Court (**1379043**). The two listed buildings located on Tower Court, to the east of the site, have frontages overlooking the building (see **Plan EDP 1**). Number 22 Tower Street is located to the south-west, where its rear aspect is presented towards 2 Tower Court.

### 22 Tower Street

- 4.19 This Grade II listed building (**1379048**) was first designated on 15 January 1973, although does not appear to have been amended since. The citation states:

*“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.”*

- 4.20 The exterior of 22 Tower Street is much as the listing citation, albeit there have been changes as a result of the alterations in the 1980s and 90s. Its principal elevation is to the south-west, where the building sits directly to the rear of the pavement on Tower Street (**Image EDP 7**).
- 4.21 It is of four storeys with a five-storey tower to left (north-west). The whole is built of yellow brick with red brick detailing.
- 4.22 The central doorway has a stucco doorcase with entablature and scrolled pediment with pilasters surmounted by a ball-finial, the door is flanked by pilasters with ball finials (**Image EDP 8**). The door itself is modern timber framed and glazed, contrary to the listing

citation, which states a panelled door. The central three bays are flanked by two arch headed doorways, presumably representing former segregated access for girls and boys.

- 4.23 The central three bays rise two storeys, with the third and fourth storey set back. The original plans suggest a balustrade on this section, but it is unclear whether this has survived as this area could not be examined. This section is now enclosed behind what is known as the 'Winter Garden,' which is a glazed enclosure constructed as part of the late 1980s application. This section utilises poor quality PVC materials, which are failing, resulting in a poor-quality appearance. As such, the use of this material makes a negative contribution to the significance of the listed building by not reflecting the high-quality architecture of the building, detracting from its experience and obscuring the architectural features of this area.
- 4.24 To the left and right are ground floor extensions, which are later additions. In respect of the left hand (north-western) extension, there are three round headed windows, which in themselves have been added later as part of the late 20<sup>th</sup> century applications. The right hand (south-east) extension contains electrical plant and is 20<sup>th</sup> century in date.
- 4.25 The rear elevation, which offers its outlook towards 2 Tower Court, displays the same general architectural style as the front, with round headed brick arch windows (**Image EDP 9**). The main change to the rear is the addition of the conservatory in the late 1980s, which is joined at the ground floor only but rises two storeys. The conservatory utilises poor quality PVC materials, which are failing, resulting in a poor-quality appearance. As such, the use of this material makes a negative contribution to the listed building, by not reflecting the high quality architectural treatment of the building and detracting from its experience.
- 4.26 Other alterations to the rear include the window pattern. The original first floor windows have been replaced due to the removal of the second floor and insertion of two new floor levels within the building (the current second and third floors). The new windows are in the same style and the alterations have been undertaken to a high standard, which does not impact negatively upon the building.
- 4.27 Overall, aside from the unity of the original architectural approach to the building, there are some specific architectural embellishments of interest. These comprise the architectural motifs in the form of five relief panels with foliated decoration. One of these has 'LSB' inscribed on it, and one has 1874 in relief. One panel, on the south-eastern elevation, has an angel reading a book to two children, with terracotta brick surround.
- 4.28 The interior has been heavily altered and retains little of interest that contributes to the significance of the building.



- 4.29 The significance of the building lies overwhelmingly within its architectural and historic interest. Its architectural interest lies almost entirely in the fabric of the exterior of the building. This includes its overall unity of style, along with the high interest in some of the individual features, comprising the elaborate entrance doorcase, relief panels, and overall detailing. These factors also give the building some artistic interest. Aside from the roof structure, there is no visible architectural interest within the interior of the building.
- 4.30 The building's historic interests relate to the role of the school in relation to the provision of education for the less well-off in the later 19<sup>th</sup> century and tracing the evolution of schooling in the local area. In the absence of any related interior features, and the alterations of the layout, only the external appearance demonstrates evidence of the ambition and status of late Victorian attitudes to schooling.
- 4.31 In terms of its setting, this is predominantly defined by the street frontage on Tower Street itself, whereby this elevation contains the more elaborate architectural features and is the principal façade that was designed to be appreciated from Tower Street. To the rear, towards the site, the elevation has a lesser significance and has been altered, although does maintain the architectural unity with the rest of the building. The 1980s conservatory addition obscures much of the building in this direction.
- 4.32 More widely 22 Tower Street, along with the adjacent buildings of Tower Court, form a coherent group and each adds their own character, which enhances the experience of the listed building. Despite this, the poor quality 1980s extensions to both 22 Tower Street and 2 Tower Court (the site) make a negative contribution.
- 4.33 As identified above, 2 Tower Court was functionally related to the school, as such, the site makes a positive contribution to the historic values of 22 Tower Street. The appreciation of these links is still readily apparent, despite the intervening 1980s structures.

#### **5-8 and 10 Tower Court**

- 4.34 5-8 Tower Court (**1379041**) is a Grade II listed building located adjacent to the south-east of the site, on the opposite side of the passage of Tower Court. Its listing in fact represents a terrace of four buildings, in use as houses, with former shop fronts. The citation notes the buildings as late 18<sup>th</sup> century with mid-19<sup>th</sup> and 20<sup>th</sup> century alterations.
- 4.35 The citation describes their overall form and details, which add to their special interest and describes it as follows:

*“Yellow stock brick and stucco sill band at 1st floor level under slated mansard roofs with dormers. 3 storeys, basements and attics. 2 windows each. Wooden shopfronts with bracketed entablature with inswept frieze and projecting cornices with the exception of No.6. Shop windows altered for domestic occupation. Square-headed house and shop doorways, with the exception of No.6, with fanlights. Ground floor of No.6 altered post 1973. Ground floor of No.8 a C20 reproduction. Gauged flat brick arches to recessed sash windows, some with original glazing bars. Window heads of Nos 6 and 7 with segmental arches. Parapets. INTERIORS: not inspected.”*

- 4.36 10 Tower Court (**1379043**), although listed separately, forms part of the same terrace and has similar detailing. Its listing citation states:

*“House, formerly with shopfront; originally formed a terrace with Nos 5 to 8 (qv). Late C18, altered mid C19 and C20. Yellow stock brick with stucco ground floor and 1st floor sill band under a slated mansard roof with dormers. 3 storeys, basement and attic. 2 windows with 2-window return. The house originally had a wooden shopfront, lost post 1973. Gauged flat brick arches to recessed sash windows. Parapet. INTERIOR: not inspected.”*

- 4.37 Although not exhaustive, the listing citations demonstrate that their external architectural interest lies primarily with their façades, which front directly onto the passage of Tower Court (**Image EDP 10** and **11**). There may also be internal architectural features of interest although this is currently unknown. In terms of historic interest, there is little in the listing citation, although this element is likely to derive from their contribution to the evolving streetscene and the potential to yield evidence regarding changing social fortunes of the area and its inhabitants. There is some possible archaeological interest in the phasing of the buildings, but little in the way of artistic interest.
- 4.38 In terms of their setting, they are located on the passage of Tower Court, with the rear of 22 Tower Street, rear yard, 2 Tower Court and conservatory located opposite, along with the low wall and railings. Number 2 Tower Court may well be contemporary with these listed buildings and helps to contribute to the narrow, intimate character of their setting. Whilst each contributes to the other in terms of group value, their urban setting, formed of buildings of multiple phases, styles and character, as defined by the CAS, form the context to the buildings with little positive contribution to their significance as listed buildings.
- 4.39 Nonetheless, the existing conservatory extension of 2 Tower Court is of poor quality materials, leading to a poor appearance in conjunction with their frontages. As such, this does not sit comfortably within their setting and makes a negative contribution to the experience of these buildings.

## **Section 5**

### **Impact Assessment**

- 5.1 This section of the report summarises the nature of the development proposed, and then assesses its likely impact on those heritage assets identified in **Section 4**.
- 5.2 In summary, the proposals involve the reinstatement of the building to residential use, comprising two, one-bedroom flats. The details of the proposals are included in **Appendix EDP 1**.
- 5.3 The proposals envisage some changes to the exterior and interior of 2 Tower Court. These can be summarised as:
- a. Removal of conservatory area;
  - b. Formation of new light-well to allow daylight to basement;
  - c. New entrance to main façade;
  - d. Refurbishment of internal spaces; and
  - e. Removal of railings from the upper windows.
- 5.4 The removal of the existing conservatory (Point a) is the biggest single external change. This feature has been identified as making a negative contribution to both 2 Tower Court and the conservation area. As such, due to the removal of a structure of poor quality, this change represents an enhancement, to the current experience of both.
- 5.5 The creation of the light well (Point b) does in fact represent a reinstatement of the previous lightwell, which was located here. This change is not considered to affect the significance of 2 Tower Court or the character and appearance of the conservation area.
- 5.6 The new entrance (Point c) involves the insertion of a new door into the main elevation and slight reconfiguration of one ground floor internal partition wall. The proposed new door will involve the loss of some plain fabric, although this is currently obscured by the conservatory and of little architectural value. The proposed opening will match the proportions and style the adjacent doorway opening, with red brick detailing. The proposed replacement glazing on the ground floor, including the door, is proposed in black crittal steel framed glazing which creates a contemporary look utilising traditional styles.
- 5.7 Overall, despite the slight loss of some original, non-significant, sections of external and internal partition wall, this change will not result in harm to the significance of 2 Tower Court or adversely alter the character of the conservation area, especially in light of the removal of the 1980s conservatory and the local value of the building itself.

- 5.8 The refurbishment of the interior spaces (Point c) involves little change to the existing arrangement of the internal spaces. One part of an internal partition on the ground floor will be replaced along with a short section of staircase. The fabric of these features, being internal partitions, do not add greatly to the significance of 2 Tower Street, and despite the proposed conversion to two duplex apartments, the general arrangement of rooms will remain the same. No alterations are proposed to the layout of the other floors. As such and considering the 'local' value of the building, these changes are considered to represent no harm to 2 Tower Court.
- 5.9 It is proposed to remove the current security bars (Point d) from the windows. They are likely to have been added in association with the addition of security bars to 22 Tower Court in the 1990s, as such are a modern feature. The removal of these will revert the building back to original condition and is considered to be an enhancement to the building.

### **Surrounding Heritage Assets**

- 5.10 Insofar as the contribution made to the significance by the setting of the adjacent listed buildings of 22 Tower Court, 5-8 and 10 Tower Court are concerned, the elements of the proposals, which could potentially affect this, comprise the removal of the 1980s conservatory. The building itself is physically retained, so there will be no change to the contribution it makes to the significance of the surrounding listed buildings.
- 5.11 The current conservatory has been assessed as making a negative contribution in the way in which the buildings are experienced, by virtue of its poor-quality materials and appearance. Its removal would offer an enhancement in this regard.
- 5.12 Post its conversion, the building will no longer be associated with 22 Tower Street, however, the former historical relationships will still be easily read as the two buildings will be plainly visible from each other.
- 5.13 Overall, it is considered that the proposals represent at least 'no harm' to the significance of the surrounding designated heritage assets including the Conservation Area, if not an improvement in the way in which they are experienced due to the removal of the conservatory.

## **Section 6**

### **Conclusions**

- 6.1 In line with paragraph 189 of the NPPF, this report has described the significance of the heritage assets potentially affected, including any contribution made by their setting, and assessed the proposals in terms of their potential impact.
- 6.2 One curtilage listed building has been identified as being directly affected by the proposed development: 2 Tower Court, which is listed in association with the adjacent Grade II 22 Tower Street. Despite this, the building is only assessed of being of local value. Three other listed buildings may experience a change within their setting that could affect their significance. Furthermore, the proposals have the potential to directly affect the Seven Dials Conservation Area.
- 6.3 In terms of 2 Tower Court itself, the significance of the building is assessed as deriving from a combination of its architectural and historic interest, primarily expressed through its external fabric and appearance. The interior of the building retains little interest, beyond its basic layout.
- 6.4 This report concludes that there would be an enhancement to the building through the demolition of the 1980s conservatory. Fabric alterations are minimal, and the proposed new entrance is in keeping with the overall style of the building. Overall, it is considered that the alterations would cause 'no harm' to the building and secures the long-term future of the building and its optimum viable use.
- 6.5 Additionally, the proposals are considered to represent an enhancement to the existing character and appearance of the conservation area, due to the removal of the poor-quality conservatory. Similarly, this is considered to enhance the experience of the adjacent listed buildings.
- 6.6 Taken as a whole, it is concluded that the proposals represent an overall enhancement and should be treated favourably within the determination of the planning application and Listed Building Consent in relation to legislative requirements and local plan Policy D2.

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## **Section 7**

### **References**

Chartered Institute for Archaeologists (CIfA) 2014, *Standard and Guidance for the Archaeological Investigation and Recording of Standing Buildings or Structures*.

HMSO 1990, *Planning (Listed Buildings and Conservation Areas) Act*.

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## Images



**Image EDP 1:** 2 Tower Court, looking north-west.



**Image EDP 2:** 2 Tower Court, representative view of the interior.



**Image EDP 3:** 2 Tower Court, representative view of the interior, showing the enlarged basement.



**Image EDP 4:** 2 Tower Court, representative view of the interior, showing the main room on the first floor.



**Image EDP 5:** 2 Tower Court, representative view of the interior, showing the staircase.



**Image EDP 6:** 2 Tower Court, representative view of the interior, showing the staircase has been replaced.



**Image EDP 7:** View of 22 Tower Street from the north-west, looking south-east. Showing the main façade of the building, including the curved glass 'Winter Garden' on its façade.



**Image EDP 8:** 22 Tower Street from the south-west, looking north-east. Showing the main entrance.





**Image EDP 9:** Rear Elevation of 22 Tower Street from Tower Court, looking south-west. The late 1980s conservatory extension can be seen to left.



**Image EDP 10:** Tower Court, showing the listed buildings of 5-8 and 10 Tower Court to left, and the railings forming the boundary of the site to the right.



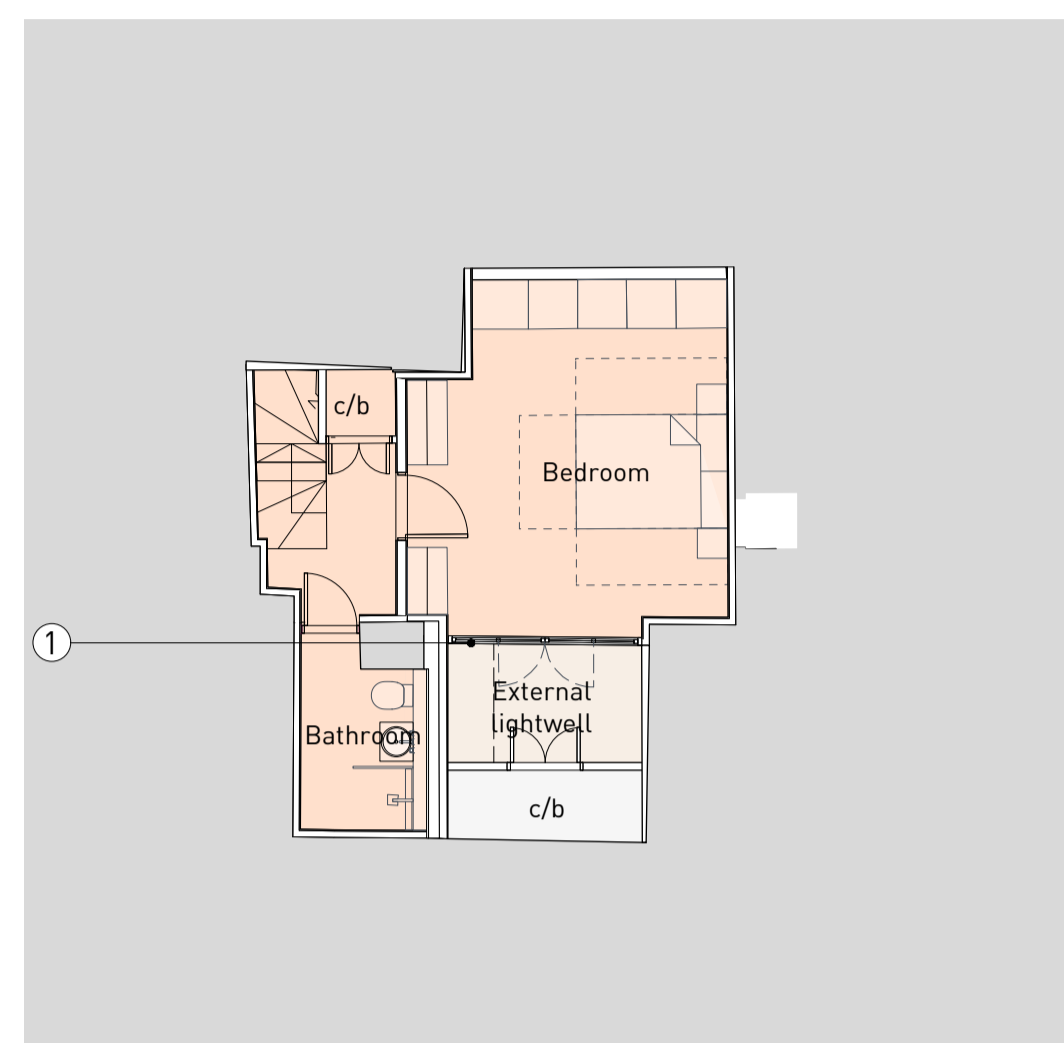
**Image EDP 11:** Tower Court, looking north. Showing the railings and 22 Tower Street to left and the listed buildings of 5-8 and 10 Tower Court to right.

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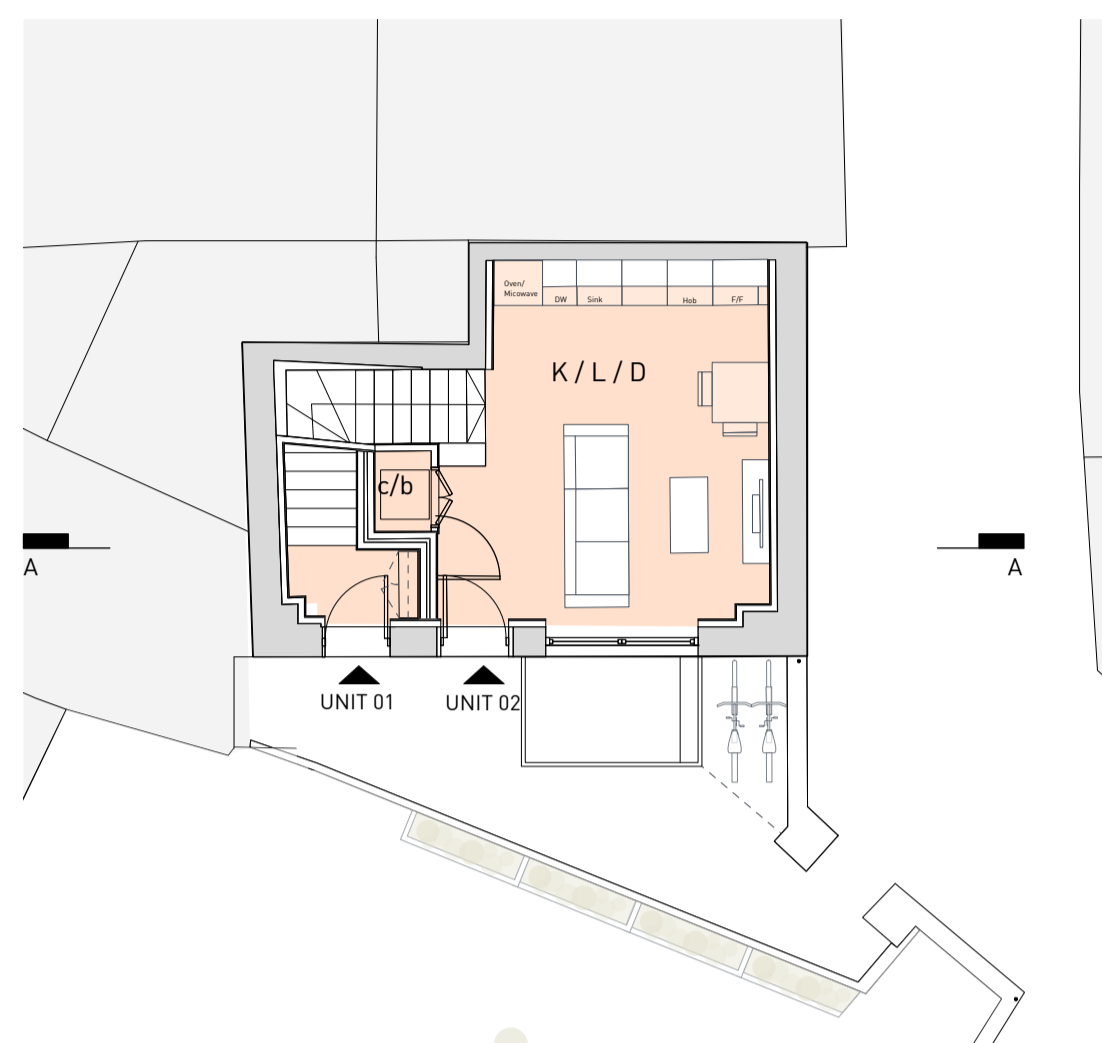
**Appendix EDP 1**  
**Plans, Elevations and Images Showing the Proposals**  
**(Drawing Number 18010\_GA.50 10.04.19)**

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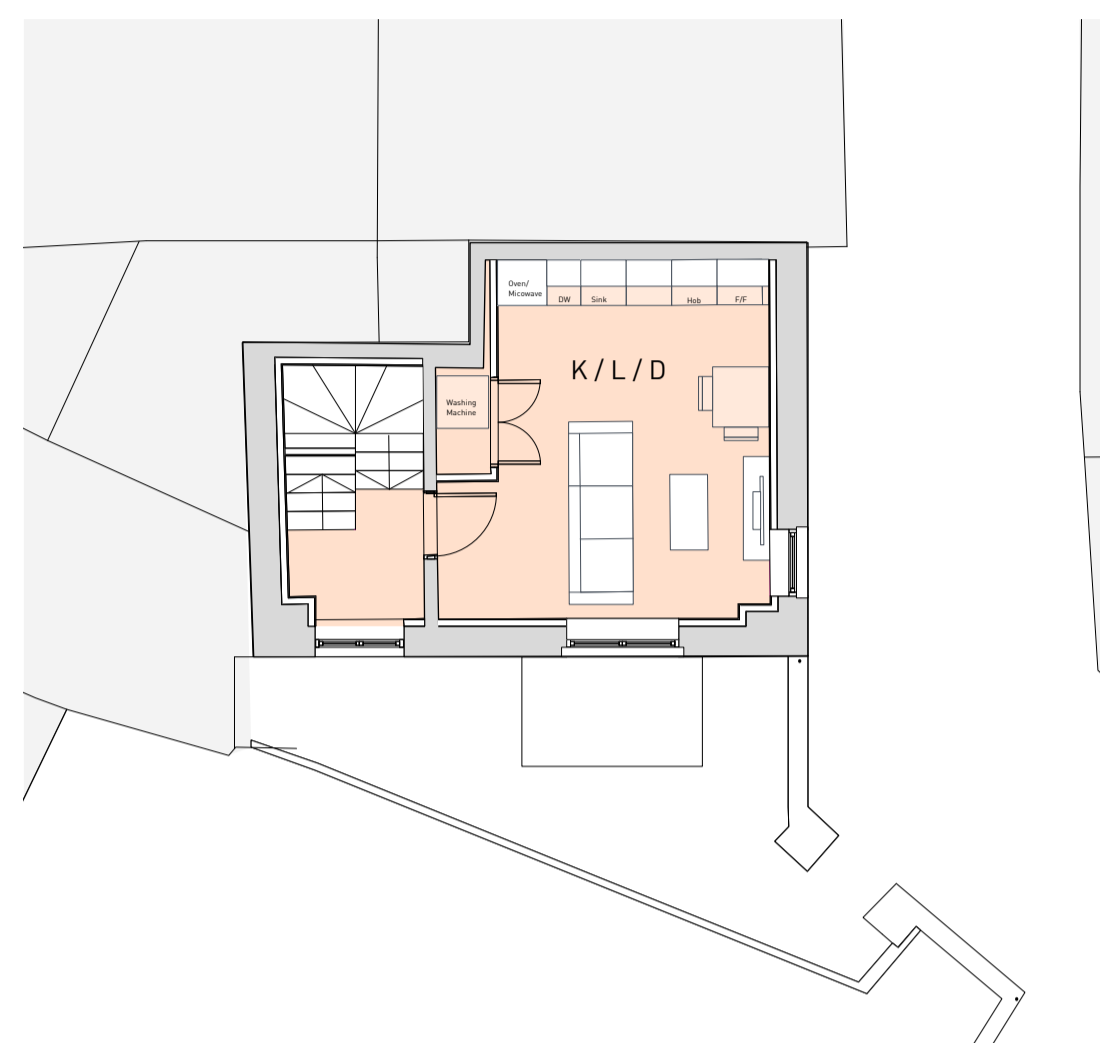
- 1 Steel Crittal Style Glazing with Slim Profiles (Colour: Black)
- 2 Refurbished Hardwood Windows, Painted White
- 3 Architectural Metalwork Railings (Canal Engineering Ltd, or similar & approved, mild steel galvanised and powder coated railings with a flat top and bottom rail, 40x8mm flat bar railings at 100mm vertical centres, to achieve 1100mm tall guarding around light-well)
- 4 Existing roof to be replaced with new slate roof
- 5 Through Coloured Smooth Render Finish (Alsecco Basic Smooth Render System or similar & approved) Proposed colour: White (Samples of colour and finish to be provided for Architect & Clients Approval)



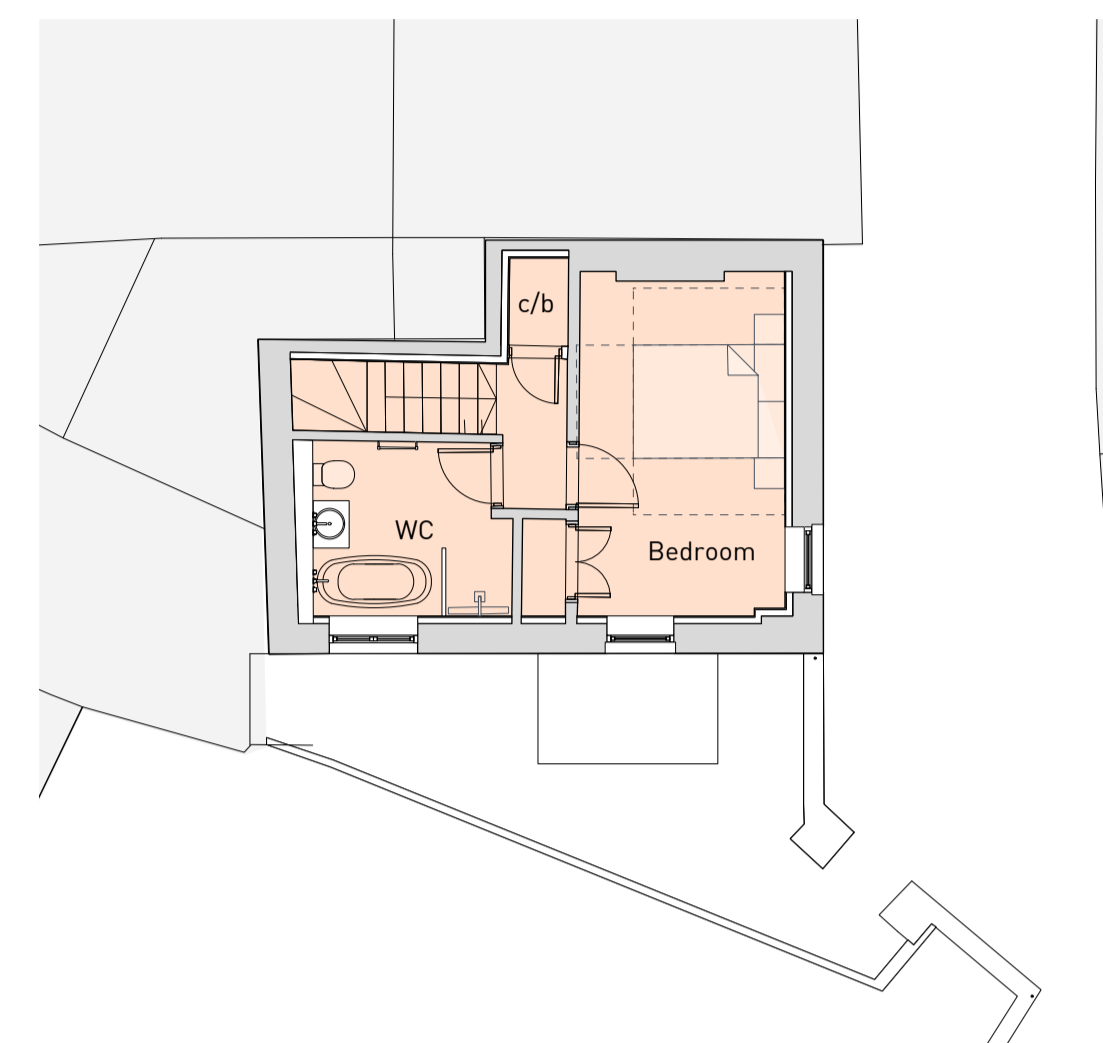
Proposed basement plan



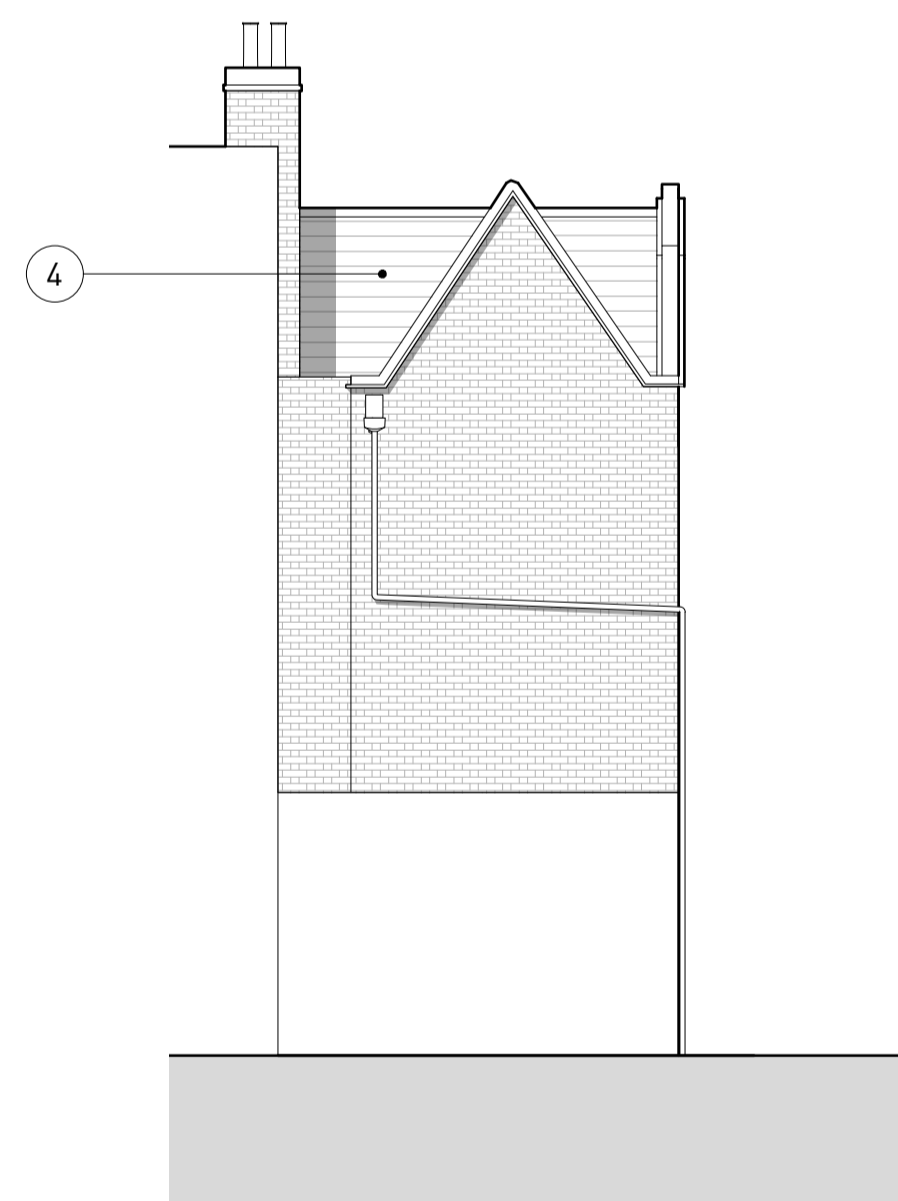
Proposed ground floor plan



Proposed first floor plan



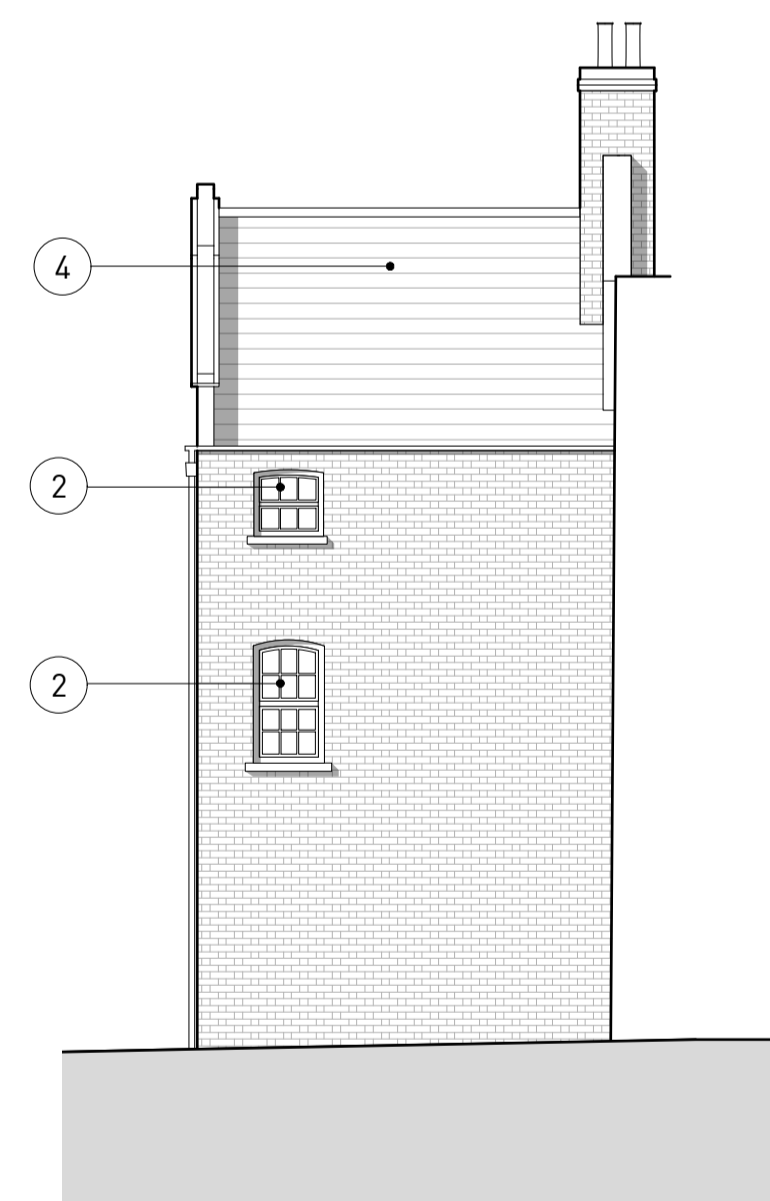
Proposed second floor plan



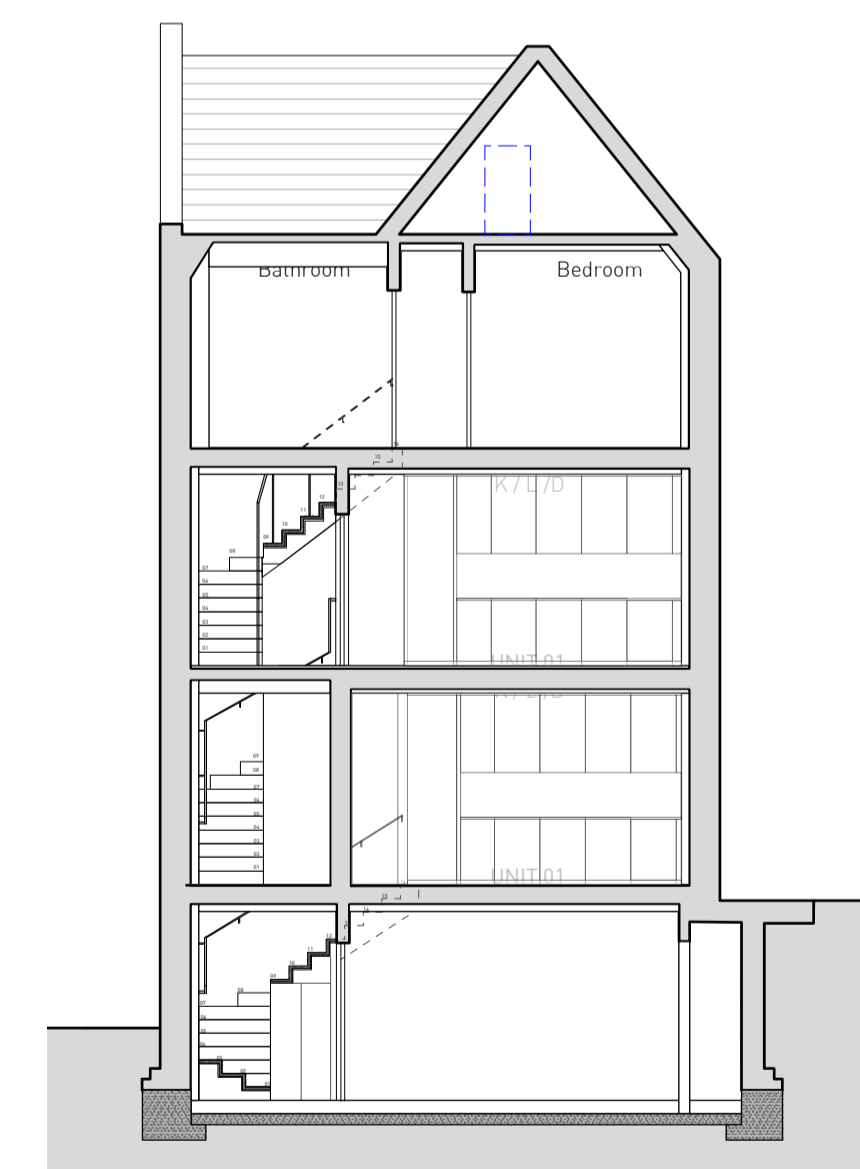
Proposed west elevation



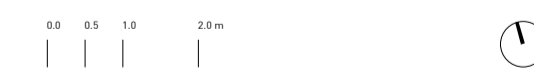
Proposed south elevation



Proposed east elevation



Proposed section A-A



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22 TOWER STREET  
CLIENT - BRITISH RETAIL CONSORTIUM

PROPOSED PLANS, SECTION, ELEVATIONS  
STATUS - PLANNING

DRAWN	CHECKED	REVISION
BS	RB	-
SCALE	DRAWING	DATE
1:100 @ A1	18010_GA.50	10.04.19
1:200 @ A3		

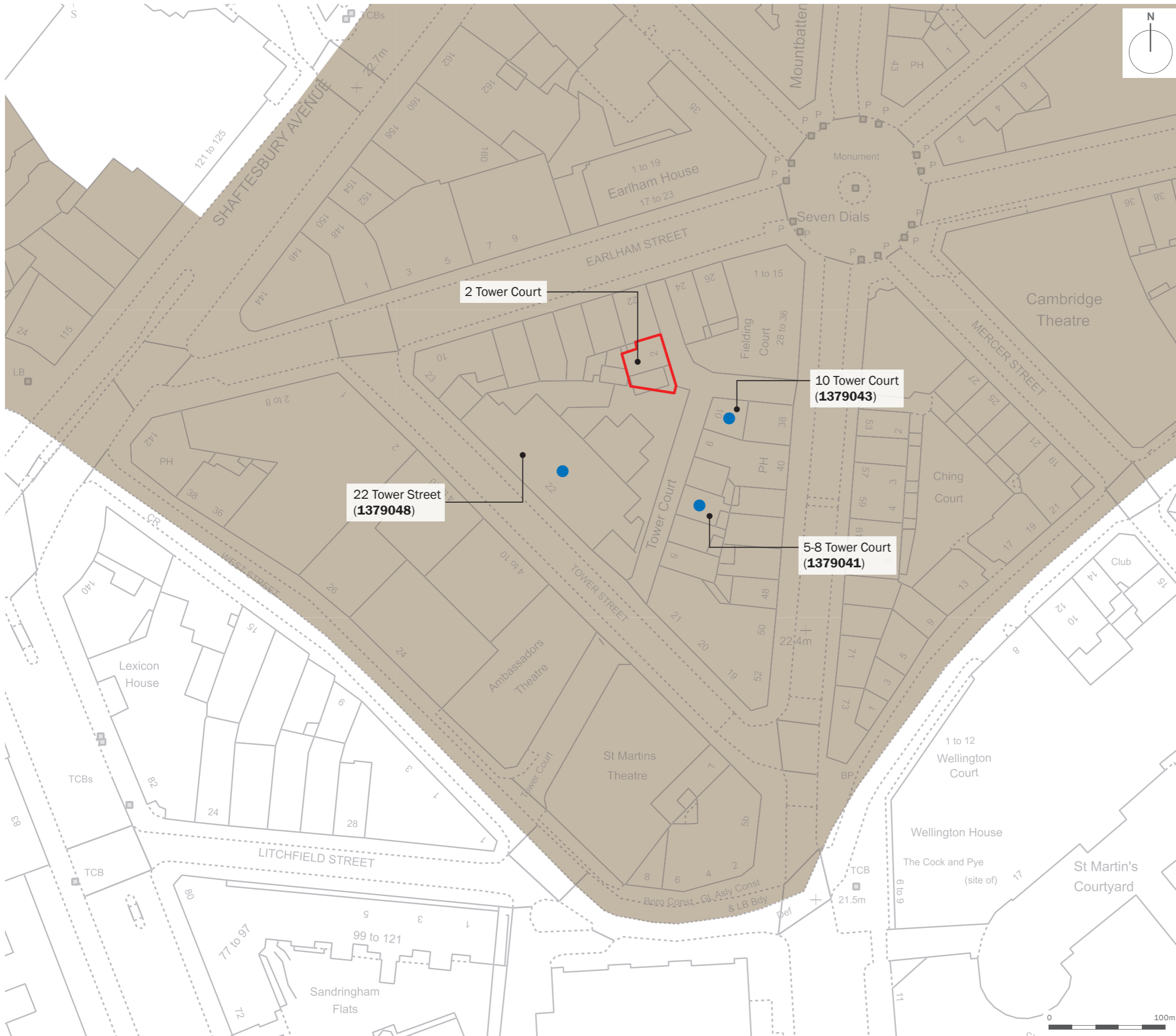
## **Plan**

### **Plan EDP 1**

Location of Site and Heritage Assets Discussed in the Text  
(edp5207\_d003a 15 April 2019 LB/EO)



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- Site Boundary
- Seven Dials Conservation Area
- Grade II Listed Buildings

<small>client</small>	<b>British Retail Consortium</b>	
<small>project title</small>	<b>2 Tower Court, London</b>	
<small>drawing title</small>	<b>Plan EDP 1: Location of Site and Heritage Assets Discussed in the Text</b>	
<small>date</small>	15 APRIL 2019	<small>drawn by</small> LB
<small>drawing number</small>	edp5207_d003a	<small>checked</small> EO
<small>scale</small>	Refer to scale bar	<small>QA</small> JTF



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