

Heritage Statement

Heal's Building, Block C Staircase, 196
Tottenham Court Road, W1T 7LQ

November 2019

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1. Introduction

Purpose of Report

- 1.1 This Heritage Statement has been prepared by Turley Heritage on behalf of the client, to provide proportionate information to the local planning authority about the likely heritage impacts associated with a listed building consent application for refurbishment to the Heal's Building 'Block C' staircase and surrounding area (**Figure 1.1**).
- 1.2 'Block C' is located within a Grade II* listed building which forms part of the complex of buildings associated with Heal's & Habitat (see **Appendix 1** for full list description). The property is also located within the Bloomsbury Conservation Area and makes a positive contribution to its character or appearance.



Figure 1.1: Site location plans showing the location of the staircase within Block C (outlined in red), in the Heal's Building. Drawing sourced from Design and Access Statement Incorporating Heritage Impact Statement 2012 (App. Ref: 2013/0118/L)

Legislative and Policy Context

- 1.3 The requirement for this report stems from the Planning (Listed Buildings and Conservation Areas) Act 1990 that places a duty upon the local planning authority in determining applications that affect a listed building or its setting to 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. It is also a duty with regard to development within conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
- 1.4 The National Planning Policy Framework (NPPF) 2019 provides the Government's national planning policy on the conservation of the historic environment. In respect of information requirements for applications, it sets out 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"*¹

- 1.5 Paragraph 190 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Structure of Report

- 1.6 In accordance with these above statutory duties and national policy, **Section 2** of this report firstly identifies the relevant heritage assets on Site that would be affected by these proposals.
- 1.7 **Section 3** sets out an overview of the historical development of Heal's Building, and uses historic images, drawings and maps to chart the past evolution of the wider complex. This provides a broad historic context for the assessment of significance further on in this report, and also a description of the existing condition of the site itself and surrounding area (Block C Staircase).
- 1.8 **Section 4** then provides a statement of significance for the listed building complex of the Heal's Building as a whole. Given the relatively limited extent and localised nature of the proposals, more detailed description is provided for 'Block C' as the specific building element which will be subject to change, within this wider complex. This heritage assessment work has been based on review of relevant published information, targeted archival research and also on-site inspection and analysis.
- 1.9 **Section 5** undertakes a review of the application proposals and assesses their impact on the significance of the identified affected designated heritage asset, in light of that described in this report and also existing heritage legislation, policy and guidance as relevant.
- 1.10 **Section 6** provides a summary of the findings of this report and its conclusions with regard to the heritage impact assessment.
- 1.11 The list entry for Heal's Building is provided at **Appendix 1**. The relevant heritage legislative policy and guidance context for the consideration of proposed change on site is set out at **Appendix 2**. This includes the statutory duty of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy in the NPPF 2019 and supported by the NPPG 2014, and relevant regional and local planning policy for the historic environment (Camden Council Local Policy).

¹ MHCLG, National Planning Policy Framework (NPPF) 2019 – para. 189

2. The Heritage Assets

Introduction

- 2.1 The National Planning Policy Framework (NPPF) 2019 defines a heritage asset as:

“A building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest”.²

Designated Heritage Assets

- 2.2 Designated heritage assets are those which possess a level of heritage interest that justifies designation under relevant legislation and are then subject to particular procedures in planning decisions which involve them. These include listed buildings, conservation areas and registered parks and gardens.

Grade II* Listed Building: Heal and Son Ltd building

- 2.3 The Site is located within the Heal and Son Ltd building which was listed Grade II* in 1974 with the entry noting specifically that the listing was for group value. When interpreting the List Entry, set out below, it should be noted that whilst the Site forms part of the earliest mid-19th century development, when the first purpose made building for the firm was designed by J Morant Lockyer in 1854, it is not discussed within the description of the building:

“Department store and warehouse. Original central section of frontage five-window bays 1914-17 by Cecil C Brewer and A Dunbar Smith; southern extension of five bays with identical style of elevation 1936-8 by Edward Maufe; northern extension of seven bays in a complementary idiom of 1961-2 by Fitzroy Robinson and Partners. Portland stone facing on a steel frame throughout. Pantiled mansard roof with dormers.

EXTERIOR: Four storeys, attic and basement. Central and southern section in stripped Classical style have free-standing octagonal columns with bronze bases and caps to ground floor carrying plain entablature. Plate glass display windows are set back behind an arcade. On upper storeys, piers rise above columns to abbreviated capitals and deep entablature having enriched cornice and incised Roman lettering with the dates MDCCCX, MCMXVI and MCMXXXVII and the name "Heal and Son" (twice). The voids between the piers in alternating rhythm of single and triple lights divided by stone pilasters and filled with close-paned steel windows for two storeys, and continuous steel windows recessed on the third storey. The spandrels between first and second floors carry cast metal panels in low relief with colour designed by Joseph Armitage and depicting various wares and implements, eg. textiles, sheep shears, a bed, teazle, pottery wheel and vase.

The northern extension has a similar rhythm of bays and identical storey heights with the entablatures ranging through. Entrance in right hand bay with projecting hood bearing the royal coat of arms. Square piers to the ground floor, the set back display windows on the front and return to Torrington Place having curving non-reflective glass. Attic

² MHCLG, National Planning Policy Framework (NPPF) 2019 – Annex 2: Glossary

recessed with flat roof and projecting frame for window-cleaning cradle. The windows between piers of larger steel sections, the spandrels between first and second floors here filled with ceramic blue and cream relief panels designed by John Farleigh and made by Kenneth Clark and depicting wares interspersed with large letters "H" for Heals.

INTERIOR: notable chiefly for the circular wooden staircase within a well at the rear of the store, built as part of the Smith and Brewer work in 1914-17. Both Heals and Habitat are entered through the 1960s building at ground-floor level and their plans are confusing on the other floors; they have no division corresponding to the periods of the building but over-and-undersail each over.

- 2.4 The Site is a small element of this much wider listed building complex, and is located within 'Block C' of the Heal's Building. It is this designated heritage asset that would be affected by the proposals alone, through physical change to the site.

Conservation Areas

- 2.5 The Site is located within Sub-Area 4 (Grafton Way/Alfred Place/Tottenham Court Road) of the Bloomsbury Conservation Area. The conservation area was first designated in 1968 with numerous subsequent extensions and boundary amendments. The Bloomsbury Conservation Area covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east. LB Camden adopted the 'Bloomsbury Conservation Area Appraisal and Management Strategy' in April 2011. The Site is also located opposite the Charlotte Street Conservation Area.
- 2.6 The proposals are confined to the interior of the Heal's Building, and therefore would not, in our view, affect the significance of either conservation area. These designated heritage assets are scoped out of this Heritage Statement, accordingly.

Non-Designated Heritage Assets

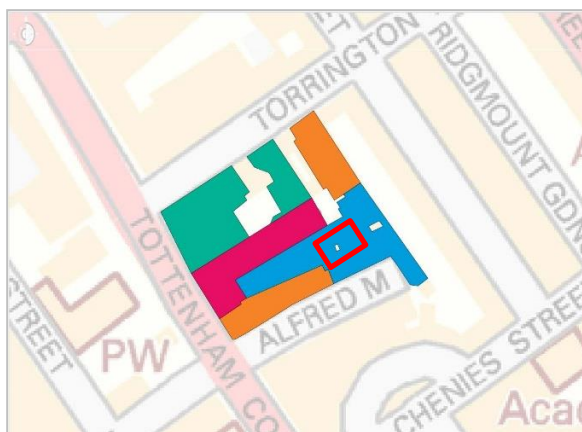
- 2.7 The NPPF³ identifies that heritage assets include both designated heritage assets and assets identified by the local planning authority (including local listing). The London Borough of Camden maintains a register "Local List" which identifies historic buildings, spaces and features that are valued by the local community and that help give Camden its distinctive identity, adopted on the 21st of January 2015. Again, due to the internal nature of the proposals such assets are scoped out of this report.

³ MHLG, National Planning Policy Framework (NPPF) 2019 - Annex 2: Glossary

3. Historical Development and Description of The Heal's Building and the Site

The Heal's Building

- 3.1 As noted earlier in this report ‘Block C’ (the ‘Site’) forms an element of the complex of buildings associated with Heal’s & Habitat. It is therefore necessary to consider not only the significance of the Site but also the contribution it makes to this group of buildings, which it should be noted are listed as a single entry, despite the acknowledged complexity of the building’s development.
- 3.2 A brief overview of the development of the Site is set out in this Section to provide an understanding of its relationship to the development of the wider Heal’s complex.
- 3.3 The history and development of ‘Block C’ is intimately linked with the incremental development of the Heal’s furniture business. Heal’s originated as a small feather-dressing firm based at Rathbone Place, and the relocation of the company to Tottenham Court Road coincided with its commercial success, expansion and diversification. As part of the earliest phase of the firm’s expansion, ‘Block C’ contributes to an understanding of this incremental historic development of the site and the waxing and waning fortunes of the business.
- 3.4 As found today, the various phases of development can be broadly separated out into main 4no. phases of development, albeit with an understanding that the actual process of development is much more complicated, with **Figure 3.1** providing a simplified representation of the phases of development for ease of reference:



- Phase 1:** 19th Century and earlier, J. Morant Lockyer **(including Site within Block C in red)**
Phase 2: 1916, Smith and Brewer
Phase 3: 1930s, E Maufe
Phase 4: 1960s, Fitzroy Robinson

Figure 3.1: Simplified representation of key phases of the development of the Heal's Site

- 3.5 A brief summary of the key phases of the development of the Heal's site are provided below in order to place the history and significance of 'Block C' in context.

Overview of the Development of the Heal's Site

- 1810** John Harris and Ambrose Heal establish the firm Heal & Son. The original premises of the company were located at 33 Rathbone Place in Fitzrovia.
- 1818** The firm relocated to no. 203 Tottenham Court Road and came to capitalise on the street's growing reputation as 'The Furnishing Street of London.'
- 1840** The firm relocated again to its current site at no. 196 Tottenham Court Road. As was typical of such enterprises, the firm occupied the ground floor of a residential terrace and established workshops toward the rear of the building. These included a bedding and steam factory. A stable block and 18th century farm building (known as Capper's Farm) were also sited to the rear of the terrace and acquired for use by the growing business. Capper's Farm was used as accommodation for the firm's owner, John Harris Jr., before later use as hostel for shop workers.
- 1854** At this point, the success of the business was such that it became necessary to construct purpose-built premises for the firm. By this time, the company's name had evolved to 'Heal and Son' and the 'Heal Bed' became 'synonymous to the best that money could buy.'

The application proposals concern the part of the Site which was developed during the mid-19th century when the architect J. Morant Lockyer was commissioned to design the new building on the site of 196 Tottenham Court Road. The building was designed as a large 7 bay range fronting onto Tottenham Court Road with workshops and showrooms extending toward the rear, as shown in the 1872 OS map (Figure 3.2). The principal elevation was designed in an elaborate Italianate style and consciously modelled on Florentine medieval palazzi, namely Alberti's Palazzo Rucellai, bringing to mind the mercantile success of famous Florentine dynasties (the remnants of this stage of development are shown as Phase 1 on **Figure 3.1**).

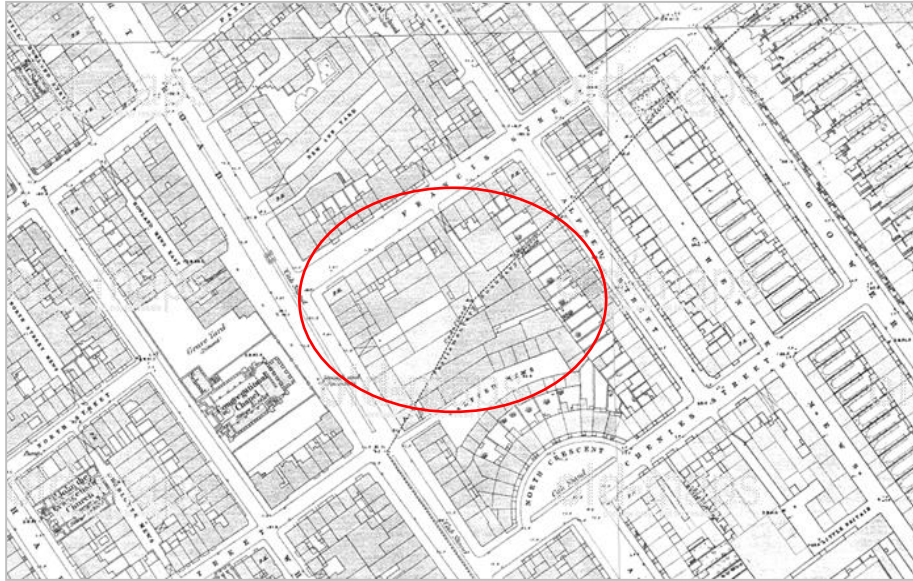


Figure 3.2: 1872 London Town Plan

1916 In 1916 the site was rationalised to designs by Smith and Brewer following further incremental development (relating to Phase 2 shown on Figure 3.1). By this stage, the business had taken up most of the urban block between Francis Street (now known as Torrington Place) and Alfred Mews, with only buildings in the North West corner and some buildings along Alfred Mews remaining outside of the Heal's site.

As part of Smith and Brewer's rationalisation, Capper's Farm and the Victorian bed factory were demolished to make room for a new bed factory. Part of Lockyer's main range was also redeveloped to feature a new sales building fronting onto Tottenham Court Road, and a pavilion building extending toward the rear of the site. The 1916 OS map (Figure 3.3) shows the rationalised site with the new Smith and Brewer building taking up much of the southern part of the urban block and addressing Tottenham Court Road.

The new façade was constructed to a pared-down classical design articulated by strong vertical pilasters and decorated cast-iron panels by Joseph Armitage beneath a decorated cornice with the 'Heal and Son' sign. This part of the building is acknowledged by Pevsner as 'the best commercial storefront of its date in London.' The Smith and Brewer scheme also retained some 19th century features, including an internal atrium. The 1916 works to the site also introduced a striking

spiral staircase to the rear of the re-designed building, recognised by many as the building's 'coup de theatre.'

This phase of development also coincided with Ambrose Heal taking over as Chairman of the firm.

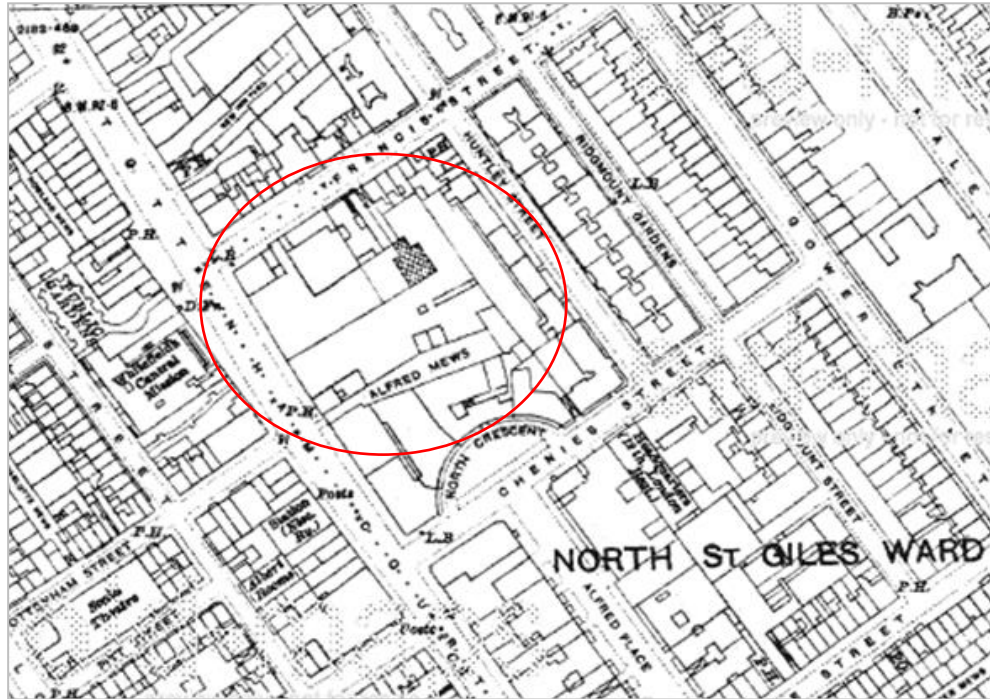


Figure 3.3: 1916 OS Map

1936 Following the 1916 works, Heal's acquired much of the northern part of the urban block and implemented an extension to the building in 1936 (as shown by Phase 3 of Figure 3.1). This extension was designed by Sir Edward Maufe and replaced significant parts of the building designed by J Morant Lockyer. It sought to unify the buildings main street frontage, seamlessly continuing the Smith and Brewer designed façade. This extension also allowed Maufe to introduce curved glass along the extent of the shop front, at that time featuring as the longest glass shop front in Europe.

The 1953-4 map, reproduced at Figure 3.4, shows the building following the 1930s extension. By this point the Heal's store includes the entire urban block between Alfred Mews and Torrington Place with the exception of a small area in the North West corner, occupied at that time by a cinema and pub.



Figure 3.4: 1953-54 OS Map

- 1939-45** During World War II the Heal's Factory was contracted to the government to produce beds and bedding for the Admiralty, alongside the large scale manufacture of parachutes. The firm also retained its own Home Guard which performed an important role in limiting any damage caused by the bombing raids of 1941.
- 1962** Further development came in the 1960s with the acquisition of the cinema (damaged by enemy action during WWII) and public house located on the north-west corner of the block which was replaced by an extension undertaken by Fitzroy Robinson. This extension provided the firm with 11,000 square feet of space to provide showrooms and new fabric and curtain departments allowing the firm to diversify. The upper floors were intended for use as offices and studio space. The completed store is shown on the 1965-70 OS map (Figure 3.5).
- 1983** In 1983 the firm was sold to Sir Terence Conran who implemented a period of extensive alterations and refurbishments. This involved the subdivision of the building into separate stores with the introduction of Habitat, Mothercare and NOW within the buildings on site. Heal's was compressed into three floors, with Habitat occupying the ground floor of the 1962 building and the entire basement level. This move also involved the ceasing of furniture production on site, with the buildings only used for retail purposes.

2000s In 2001 Heals plc. was purchased by Wittington Investments Ltd. Some further building work occurred to the site in 2006 when new departments, alongside a restaurant and bakery were added to the reconfigured store.



Figure 3.5: 1965-70 OS Map

'Block C' (The Site)

- 3.6 The Site is located in the Block C of the original J. Morant Lockyer building, which is sandwiched between early nineteenth century developments either side (**Figure 3.6**).



Figure 3.6: The existing Heal's Building complex at second floor level, with the Site outlined in red. Drawing sourced from Design and Access Statement Incorporating Heritage Impact Statement 2012 (App. Ref: 2013/0118/L)

- 3.7 As noted above, the building where the refurbishment works are proposed was built in the mid-19th century and forms part of the earliest element of the Heal's Building complex. However, while the structure of the building dates from the 19th century the interior has been heavily altered primarily during the 20th century, as a direct result of the large scale developments to the wider complex during this time.
- 3.8 At second floor level, the staircase where some of the refurbishment works are proposed, particularly the replacement of a handrail and addition of missing spandrels, is accessed via a hallway which connects Block A with Block C (**Figure 3.7**), and the staircase itself appears to date from the late-19th or early-20th century (**Figure 3.8**).



Figure 3.7: Modern detailing to hallway interior



Figure 3.8: Staircase within Block C leading to third floor level, missing spandrel towards the top

3.9 Also at second floor level floor level there is an uneven floor leading from the staircase to the entrance of the kitchen and storage space which provides access to a number of offices (**figure 3.9**). This area features historic double doors connecting these two spaces, however, the majority of interiors have been compromised by later alterations and plan form reconfigurations. The interiors here primarily date from the mid to late 20th century and little of the historic fabric is visible at this level (**Figure 3.10**).



Figure 3.9: Hallway connecting staircase with kitchen and storage space, with historic double doors.



Figure 3.10: Modern partitions at second floor level



Figure 3.11: Modern Door leading to Block A

4. Significance of the Heritage Asset

Significance and Special Interest

- 4.1 The NPPF 2019 defines the significance of a heritage asset as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”⁴

- 4.2 Historic England has also published other guidance⁵ on the identification of four types of heritage value that a designated or also non-designated heritage asset may hold. These values are: aesthetic, communal, historic and evidential. This document can also be used as a broad framework for the assessment of the significance of all heritage assets.

Listed Buildings

- 4.3 Listed buildings are defined as designated heritage assets that hold architectural or historic interest. The principles of selection for listed buildings are published by the Department of Culture, Media and Sport and supported by Historic England’s Listing Selection Guides for each building type.⁶ The relevant listing selection guide for the building assessed in this report is *Commerce and Exchange Buildings*.⁷

Assessment Method

- 4.4 The following assessment work has been undertaken on the basis of a review of existing published information, targeted archival research (national and local, public and private resources) and on-site visual survey and analysis. This is proportionate to both the importance of each of the affected designated heritage assets, and the level of intervention proposed by the application scheme.

The Heal’s Building: Grade II* Listed Building

Architectural Interest

- 4.5 The grade II* listed Heal’s Building is a complex arrangement of component buildings which span over a century and display a variety of architectural styles.
- 4.6 The several component buildings are of varying architectural interest where each stage of construction represents the evolving styles of retail architecture over time, from the initial and first purpose built new showrooms designed in the Italianate style by James Morant Lockyer and completed in 1854 and later the extension next door in the stripped classical style from 1916 (Smith and Brewer), followed by further extensions in 1935

⁴ MHCLG, National Planning Policy Framework (NPPF) 2019 – Annex 2: Glossary

⁵ Historic England: Conservation Principles, Policies and Guidance, 2008

⁶ DCMS Principles of Selection for Listing Buildings, 2018

⁷ Historic England. Listing Selection Guides. December 2017 (*Commerce and Exchange Buildings*)

(Edward Maufe), which replaced the majority of the Lockyer's building, and the 1961-62 extension (Fitzroy Robinson and Partners) in a similar style.

- 4.7 The 1916 extension by Smith and Brewer in particular is of high architectural significance as author Kathryn A. Morrison notes,

*"In many ways, the most modern store to be erected in early twentieth century London was Heal's extension on Tottenham Court road... As Heal's shopfront was in the form of a protected arcade, the design of the façade managed to be aesthetically pleasing without the shopkeeper sacrificing an inch of glass. This clever solution to one of the main problems besetting Edwardian store architects was popular with critics but not taken up by many retailers."*⁸

- 4.8 Pevsner also acknowledged the quality of this extension when he stated it is 'the best commercial storefront of its date in London.'

- 4.9 The different elements each illustrate a new phase in the development of this historic retailer, and its ability to commission new high quality architecture to support its expansion (**Figure 4.1**). Together, the complex forms one of the most well-known and influential retail establishments of the 20th century.



Figure 4.1: The listed building complex of the Heal's Building.

Historic Interest

- 4.10 The Heal's building is of historic interest as it demonstrates the phased development of the larger retail complex, particularly in the 20th century, and the 1916 extension by Smith & Brewer is a highly influential example of the building type, although only one component of the group, which benefited from the success and growth of Heal's. As a

⁸ Kathryn A Morrison. *English Shops and Shopping*. Yale University Press, 2003. Pg. 169.

result, the building details the changing fashion and needs of retailers from the mid-19th century to the present. Heal's Building complex, albeit heavily altered over time, thus has group value as one element within a wider townscape scheme of the various phases of retail development within the larger conservation area.

Summary of Significance

- 4.11 This grade II* listed complex is of special interest and traces the development of the Heal's complex from the first purpose building in the 19th century, and following the subsequent 150 years, provides tangible evidence of the waxing and waning fortunes of the business, and also the changing tastes and styles of retail architectural design over time.



Figure 4.2: Heals new furniture showrooms, built in 1854 by J. Morant Lockyer, photo taken in 1897

- 4.12 Key associations with the well-known architects, particularly Smith and Brewer, contribute to the overall significance of the buildings, shedding light on the ideology and application of commercial retail space in the 19th and 20th centuries, and the intent of

individuals, particularly Ambrose Heal, to display their wealth and influence through the foundation of such enduring establishments.



Figure 4.3: Heals Shopfront 1912-1916 by Smith & Brewer

- 4.13 Together with other historic buildings in the surrounding area, the listed building complex formed part of the street's early reputation as 'The Furnishing Street of London', and the importance of the building on modern retail has been illuminated by the well-known authors Kathryn A Morrison and Nikolaus Pevsner. As a result of these factors, the Heal and Son building complex forms one of the most well-known and influential retail establishments of the 20th century in London.

Contribution of the Site to the Significance

- 4.14 As previously discussed, the Site is located in and around the staircase within Block C of the wider Heal's building complex. While this building dates from the earliest phase of development, the mid-19th century, the staircase which forms the Site is a later insertion within the Block C. This alteration dates from the late 19th to early 20th century, respectively, and were carried out to improve access to the building.

- 4.15 In summary:

- *Stair*: later phase and fairly ordinary/unremarkable example of a typical late 19th to early 20th century staircase installed for functional circulation reasons. Makes no particular contribution to the significance of the listed building, especially in relation to other historic and quality designed stairwells within the complex which are of greater significance, such as the 1916 spiral staircase to the rear of the re-designed building, recognised by many as the building's 'coup de theatre'.
- *Plan form immediately surrounding staircase*: product of numerous successive phases of later change as the complex has been adapted for the evolving needs

and uses of Heal's and other tenants, some elements of which are more valuable than others. This is evident particularly at second floor level where there are historic double doors connecting the staircase to the entrance of the kitchen and storage space which contributes to the significance of Block C (**figure 3.9**) as well as the late 20th century cupboard and partitions which detract from this significance (**Figure 3.10**).

- 4.16 Overall, our analysis reveals that the Site is of lesser contribution to the significance of the listed building, relative to the existing earliest, and also better quality later, phases of development and more intact interiors, the external elevations, within the context of the whole, and its special interest.

5. Application Proposals and Heritage Impacts

Introduction

- 5.1 The affected designated heritage asset of Heal's Building has been identified and its significance described as part of this report, in **Sections 2-4**, and **Appendix 1**. This analysis is appropriately specific to the staircase located in Block C, which is the subject of the listed building consent application.
- 5.2 The relevant heritage legislative, policy and guidance is also set out in full in **Appendix 2** of this report. This includes the statutory duties of the Planning (Listed Building and Conservation Areas) Act 1990, national policy set out in the NPPF 2019 and supported by the NPPG, and local policy and guidance (London Borough of Camden) for change within the historic environment.
- 5.3 Together these sections and appendices provide the appropriate context for the consideration of these listed building consent application proposals by the local planning authority.

Heritage Context

- 5.4 The analysis set out at **Sections 3 and 4** of this report establishes that the Site is located in the staircase within Block C of the grade II* listed Heal's Buildings. The complex dates from the mid-19th century with the first purpose built construction by J. Morant Lockyer, followed by successive extension and alterations primarily from 1912-1916 by Smith and Brewster, in 1935 by Edward Maufe which replaced a majority of the original Lockyer building, and in the 1960s by Fitzroy Robinson. All phases form an element of the listed complex, which makes an important, positive contribution to the architectural and historic interest of the building. However, the staircase and the surrounding fabric that form the Site are later insertions within Block C, which while part of the original 1854 construction, have been heavily altered due to successive extensions and demolition to this structure. These alterations date from the late 19th century to the mid-20th century, respectively. In summary:
 - *Stair*: later phase and fairly ordinary/unremarkable example of a typical early to mid-20th century staircase installed for functional circulation reasons. Makes no particular contribution to the significance of the listed building, especially in relation to other historic and quality designed stairwells within the complex which are of greater significance, such as the 1916 spiral staircase to the rear of the re-designed building, recognised by many as the building's 'coup de theatre'.
 - *Plan form immediately surrounding staircase*: product of numerous successive phases of later change as the complex has been adapted for the evolving needs and uses of Heal's and other tenants, some elements of which are more valuable than others. This is evident particularly at second floor level where there are historic double doors connecting the staircase to the entrance of the kitchen and storage space which contributes to the significance of Block C (**figure 3.9**) as well

as the late 20th century cupboard and partitions which detract from this significance (**Figure 3.10**).

- 5.5 Overall, the Site makes, at best, a limited contribution to the significance of the listed building, relative to other key phases and better/more intact interiors, the external elevations, within the context of the whole and its special interest.

Application Proposals

- 5.6 The application proposals comprise the following:

- Stripping out of the vinyl flooring to the staircase and 2nd floor corridor – to exclude kitchenette and security rest room.
- Removal of the defective handrails and installation of new handrails to match the existing.
- Reinstallation of No. 4 new spindles to match existing in staircase where previous spindles were lost.
- New general and emergency lighting to the 2nd floor corridor and staircase. Lighting is to match the existing in the rest of the stairwells throughout the building.
- Installation of a new automatic smoke detection to the 2nd floor corridor.
- Redecoration of the steps in the 2nd floor corridor.

- 5.7 Full details with regard to the refurbishment are set out in the Design and Access Statement and also within the schedule/diagram of works prepared by Workman LLP. This Heritage Statement should be read in conjunction with that design material.

Heritage Impact Assessment

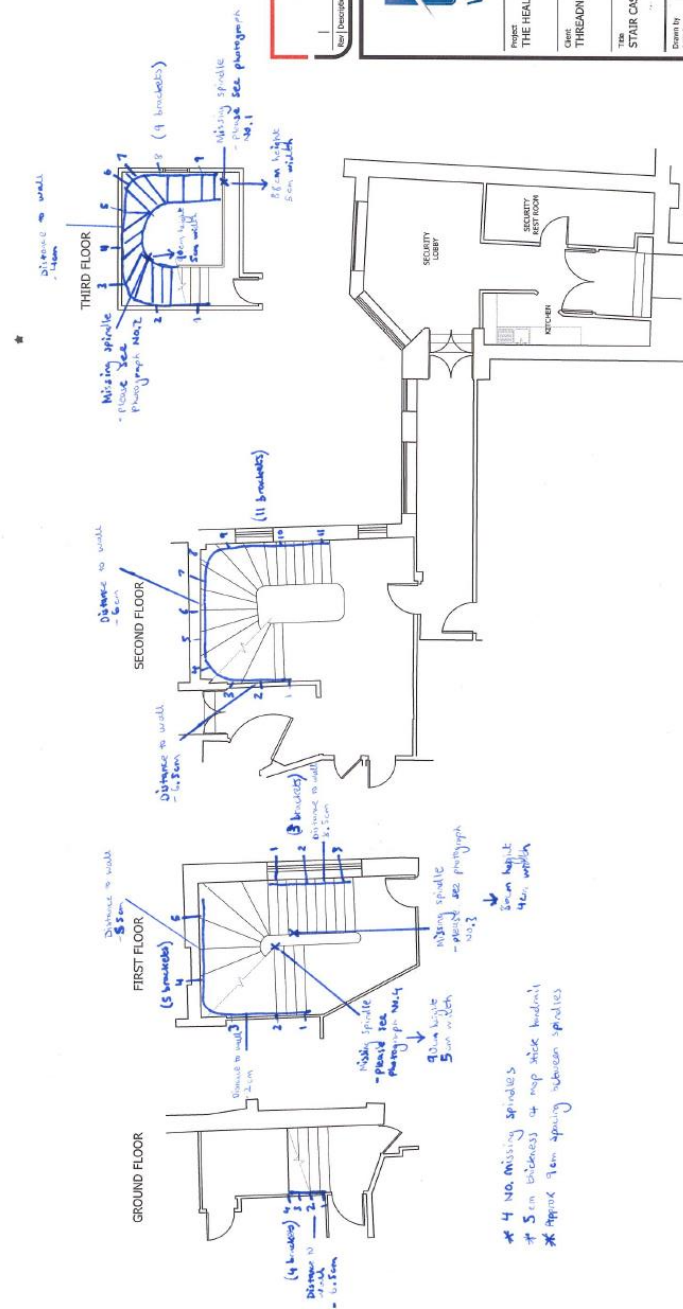
Use and Access

- 5.8 The Design and Access Statement as well as the Schedule of Works demonstrate that the area which comprises the Site has fallen into a poor state of repair, which these refurbishment works will remedy, providing both safer access and use to this area of the Heal's Building, Block C by itself.

Refurbishment of existing stair and immediate surrounding area

- 5.9 It has been established in this report at **Sections 3 and 4**, that the existing stair is an ordinary late-19th or early-20th century structure, which also makes no particular contribution to the building's special interest, as a whole.
- 5.10 On this basis, the addition of No. 4 new spindles to replace those missing, designed to match the existing or lost in material and detail, (two at first floor level and two at third floor level), noted in the below drawing and referenced in **Figure 5.2** will not adversely impact upon the significance of the listed building overall. In addition, the removal of

DRAFT	Rev / Description	By / Date
		
Project THE HEAL'S BUILDING, LONDON		
Client THREADNEEDLE PENSIONS LTD		
TITLE STAIR CASE PLANS		
Issued by MBS	Reviewed by SVR	Date MAY 2019
Scale 1:100 @A3		
Drawing Number L182693-A01-001		Revision



statements shown were supplied by a 3rd party; Workman LLP therefore take no responsibility for the accuracy or information taken from them.



Figure 5.2: Missing Spindles to be replaced at third floor level (top) and first floor level (bottom) exact location detailed in Figure 5.1

- 5.11 It has also been established that the interiors here primarily date from the mid to late 20th century and little of the historic fabric is visible at this level and make no particular contribution to the buildings special interest, as a whole.
- 5.12 On this basis, the refurbishment works at 2nd floor level, including the installation of a new automatic smoke detector, new general and emergency lighting, to match existing, as well as stripping out of the modern vinyl floor to the corridor and staircase and the redecoration of the steps in the same corridor will not impact adversely upon on the significance of the listed building. In addition, these works would not detract from the historic character or appearance of this space where that remains today.

Compliance with Heritage Legislation, Policy and Guidance

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.13 The Planning Act 1990 places a duty upon the local planning authority in determining applications for development which affects a listed building. Special regard should be taken to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses. It is demonstrated within this report that the application proposals have accorded considerable weight and importance to these statutory duties as is required, and so will overall preserve the special interest of the listed building.

NPPF 2019 and NPPG

- 5.14 In accordance with the requirements of Paragraphs 189 and 190 of the NPPF 2019, the significance of the affected heritage asset of the listed building has been described in this report. Consequently, the application proposals have been informed by a clear understanding and appreciation of the historical development and architectural character of the listed building.
- 5.15 In accordance with Paragraph 192 of the NPPF 2019 due account has been taken of the desirability of sustaining and enhancing the significance of the affected heritage asset and putting it to a viable use consistent with its conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness. The application scheme is considered to achieve this through sensitive refurbishment and improved safety within the building, which will help to ensure its future use and its long-term conservation.
- 5.16 Paragraph 193 requires that great weight should be given to the conservation of designated heritage assets. Importantly, Annex 2 of the NPPF defines 'conservation' as the process of maintaining and manage change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. It is not a process that should prevent change, where proposals, such as this application scheme, have been well-informed and would overall sustain the significance of the listed building.
- 5.17 Paragraph 194 sets out that any harm to, or loss, of significance of a designated heritage asset would require clear and convincing justification. This report finds that, overall, the significance of the listed building will not be harmed by these proposals when considering the relative significance of the listed building as a whole. Therefore, the tests set out in paragraphs 195 and 196 of the NPPF should not apply.

London Plan 2016

- 5.18 This report appropriately identifies the designated heritage asset that will be affected by these proposals, and describes how it will be valued and conserved. The proposals will preserve the character and appearance of the listed building through sensitive refurbishment which will match the existing design. This is in accordance with Policy 7.8 of the London Plan 2016.

Camden Local Plan 2017 and Camden Planning Guidance 2019

- 5.19 It is demonstrated in this report that the application proposals will not adversely affect the significance of the listed building and has taken opportunities to improve the quality,

functionality and character of the listed building. Any new work will be designed to match the existing, and is of an appropriate design quality. This is in accordance with Policy DC1 and DC2.

- 5.20 The proposals are also in compliance with Camden Planning Guidance, Design 2019 where the proposed required works sustain the significance and do not adversely impact upon the listed building.

6. Summary and Conclusions

- 6.1 In summary, the designated heritage asset that will be affected by the listed building consent application proposals – namely, the grade II* listed building complex of Heal and Son – has been identified and its significance described proportionately as part of this report, in **Sections 2-4** (and **Appendix 1**).
- 6.2 The assessment within **Section 5** describes the application proposals, and assesses the impact of the proposed focused refurbishment on the significance of the listed building, in light of the relevant heritage legislation, national and local policy and guidance context. It finds that, overall, these proposals will sustain the contribution made by the Site's existing interior features to the significance of the listed building as a whole. This is due to their traditional design and materiality, which will match the existing, and also provide further safety benefits with the addition of smoke detectors, new lighting, and the renovation of the staircase which is in a state of disrepair. The required works will not impact adversely upon the significance of the listed building.
- 6.3 The proposals will therefore satisfy the relevant statutory duty of the Planning (Listed Buildings and Conservation Areas) Act 1990; national policy set out in the Framework and supported by the NPPG (including paragraphs 189, 190, 192, 193, 194, 195 and 196); Further Alterations to the London Plan (policy 7.8); and local policy set out in the Camden Local Plan 2017 (policies DC1 and DC2) and the Camden Planning Guidance, Design 2019.

Appendix 1: List Entry

HEAL AND SON LIMITED INCLUDING HABITAT

Heritage Category: Listed Building

Grade: II*

List Entry Number: 1379023

Date first listed: 14-May-1974

Date of most recent amendment: 11-Jan-1999

Statutory Address: 18-26, TORRINGTON PLACE

Statutory Address: HEAL AND SON LIMITED INCLUDING HABITAT, 191-199, TOTTENHAM COURT ROAD

Map



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The above 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 - 1379023 .pdf([opens in a new window](#))

The PDF will be generated from our live systems and may take a few minutes to download depending on how busy our servers are. We apologise for this delay.

This copy shows the entry on 15-Oct-2019 at 12:20:58.

Location

Statutory Address: 18-26, TORRINGTON PLACE

Statutory Address: HEAL AND SON LIMITED INCLUDING HABITAT, 191-199, TOTTENHAM COURT ROAD

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

County: Greater London Authority

District: Camden (London Borough)

National Grid Reference: TQ 29531 81906

Details

TQ2981NE 798-1/99/1640

CAMDEN TOTTENHAM COURT ROAD (East side) Nos.191-199 (Consecutive) Heal and Son Ltd including Habitat (Formerly Listed as: TOTTENHAM COURT ROAD Nos.193-199 (Consecutive) Heal & Son Ltd)

14/05/74 GV II* Includes: Nos.18-26 TORRINGTON PLACE. Department store and warehouse. Original central section of frontage five-window bays 1914-17 by Cecil C Brewer and A Dunbar Smith; southern extension of five bays with identical style of elevation 1936-8 by Edward Maufe; northern extension of seven bays in a complementary idiom of 1961-2 by Fitzroy Robinson and Partners. Portland stone facing on a steel frame throughout. Pantiled mansard roof with dormers. EXTERIOR: Four storeys, attic and basement. Central and southern section in stripped Classical style have free-standing octagonal columns with bronze bases and caps to ground floor carrying plain entablature. Plate glass display windows are set back behind an arcade. On upper storeys, piers rise above columns to abbreviated capitals and deep entablature having enriched cornice and incised Roman lettering with the dates MDCCCX, MCMXVI and MCMXXXVII and the name "Heal and Son" (twice). The voids between the piers in alternating rhythm of single and triple lights divided by stone pilasters and filled with close-paned steel windows for two storeys, and continuous steel windows recessed on the third storey. The spandrels between first and second floors carry cast metal panels in low relief with colour designed by Joseph Armitage and depicting various wares and implements, eg. textiles, sheep shears, a bed, teazle, pottery wheel and vase.

The northern extension has a similar rhythm of bays and identical storey heights with the entablatures ranging through. Entrance in right hand bay with projecting hood bearing the royal coat of arms. Square piers to the ground floor, the set back display windows on the front and return to Torrington Place having curving non-reflective glass. Attic recessed with flat roof and projecting frame for window-cleaning cradle. The windows between piers of larger steel

sections, the spandrels between first and second floors here filled with ceramic blue and cream relief panels designed by John Farleigh and made by Kenneth Clark and depicting wares interspersed with large letters "H" for Heals. INTERIOR: notable chiefly for the circular wooden staircase within a well at the rear of the store, built as part of the Smith and Brewer work in 1914-17. Both Heals and Habitat are entered through the 1960s building at ground-floor level and their plans are confusing on the other floors; they have no division corresponding to the periods of the building but over-and-undersail each over.

Listing NGR: TQ2953181906

Legacy

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

Legacy System number: 478388

Legacy System: LBS

Legal

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

End of official listing

Appendix 2: Heritage Legislation, Policy and Guidance

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for;

“(s.7) ... any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest ...”

In determining such applications the following duty is placed upon the decision maker:

“s.16(2) In considering whether to grant listed building consent for any works 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.”

Importantly, the meaning of preservation in this context, as informed by case law, is taken to be the avoidance of harm.

National Policy

National Planning Policy Framework (NPPF) 2019

The National Planning Policy Framework (NPPF) was introduced in March 2012 and provides a full statement of the Government's planning policies. The Ministry for Housing, Communities and Local Government published a revised document in July 2019.

Chapter 16 (Conserving and Enhancing the Historic Environment) sets out the Government's policies regarding planning and the historic environment.

In determining applications paragraph 189 requires that an applicant provide a description of the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential effect of the proposal on their significance.

Paragraph 192 sets out the considerations to be made by the local planning authority in determining planning applications. These are; the desirability of sustaining and enhancing the significance of heritage assets and putting them into viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and, the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 193 applies to the consideration of the effect of proposed development on the significance of a designated heritage asset, noting that great weight should be given the asset's conservation - the more important the asset, the greater the weight should be. This includes the setting of a heritage asset. It is noted that significance can be harmed or lost through alteration or destruction of the asset itself or, by development within its setting.

As heritage assets are irreplaceable, paragraph 194 stipulates that any harm or loss requires clear and convincing justification. It is noted in paragraph 195 that substantial harm or loss of a

grade II listed building or park or garden should be exceptional and substantial harm or loss of designated heritage assets of the highest significance should be wholly exceptional. In such cases local planning authorities should refuse consent in these circumstances unless it can be demonstrated it necessary to deliver substantial public benefits that outweigh such harm or loss. Alternatively, the nature of the heritage asset prevents all reasonable uses of the site; and, no viable use of the heritage asset can be found in the medium term through appropriate marketing that will enable its conservation; and, conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and, the harm or loss is outweighed by bringing the site back into use.

Paragraph 196 applies where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset. In these circumstances the harm should be weighed against the public benefits of the proposal. It outlines this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

The Development Plan

The Development Plan for the London Borough of Camden comprises the London Plan 2016, and the Camden Local Plan 2017. These documents set out the spatial vision and guidance that informs development decisions in the local area.

The London Plan (Minor Alterations to the London Plan) March 2016

The London Plan was adopted by the Greater London Authority in July 2011 and sets out the Spatial Development Strategy for all Boroughs within Greater London. It replaces the London Plan (consolidated with alterations since 2004), which was published in February 2008. The Plan has been subsequently revised to ensure consistency with the NPPF (2012 edition) and other changes since 2011. The plan has been amended through the publication of Revised Early Minor Alterations (October 2013) and Further Alterations to the London Plan (FALP) (January 2014 and March 2015).

In May 2015 two sets of Minor Alterations to the London Plan (MALPs) – Housing Standards and Parking Standards – were published for public consultation. These were prepared to bring the London Plan in line with new national housing standards and the Government’s approach to car parking policy. An Examination in Public considered the MALPs in October 2015, and they were formally published as alterations to the London Plan in March 2016. The Draft London Plan was published for consultation on 29th November 2017.

The London Plan sets out strategic policies regarding the historic environment in London, including Policy 7.8 (Heritage assets and archaeology), which states that:

“Strategic

A 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.

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

Planning decisions

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset ...”

Camden Local Plan 2017

The Camden Local Plan sets out the Council’s planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010).

The Draft Local Plan was released in 2015. Following this, public hearings were held in October 2016 and further modifications were consulted on in early 2017. Following the Inspector’s report the Local Plan was adopted in July 2017, incorporating the Inspectors recommended modifications.

The Local Plan ensures that Camden continues to have robust, effective and up to-date planning policies that respond to changing circumstances and the borough’s unique characteristics and contribute to delivering the Camden Plan and other local priorities. The Local Plan will cover the period from 2016-2031.

Policy D1 (Design) sets out that:

“The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*

- g. is inclusive and accessible for all;*
- h. promotes health;*
- i. is secure and designed to minimise crime and antisocial behaviour;*
- j. responds to natural features and preserves gardens and other open space;*
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping;*
- l. incorporates outdoor amenity space;*
- m. preserves strategic and local views;*
- n. for housing, provides a high standard of accommodation; and*
- o. carefully integrates building services equipment.*

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions..."

Policy D2 (Heritage) states:

"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

Designated 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 of appearance of that conservation area; and*
- h. preserves 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.*

Other Material Considerations

National Planning Policy Guidance (NPPG)

National Planning Practice Guidance (NPPG) 2019 has been issued by the Government as a web based resource and living document. This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.

The NPPG 2019 helps to define some of the key heritage terms used in the NPPF. With regard to substantial harm, it is outlined that in general terms this is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special interest. Optimum viable use is defined in the NPPG as the viable use likely to cause the least harm to the significance of the heritage asset, not just through

necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.

Public benefits are also defined in the NPPG 2014, as anything that delivers economic, social and environmental progress as described in the NPPF 2018. Public benefits should flow from the proposed development, and they may include heritage benefits.

Department of Culture, Media and Sport Circular: Principles of Selection for Listing Buildings 2018

The Principles of Selection for listing buildings sets out the general criteria for assessing the special interest of a building in paras. 16 and 17, as below:

“16. The Secretary of State uses the following criteria when assessing whether a building is of special architectural or historic interest and therefore should be added to the statutory list:

Architectural Interest: To be of special architectural interest a building must be of importance in its design, decoration or craftsmanship. Special interest may also apply to particularly significant examples of building types or techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms. Engineering and technological interest can be an important consideration for some buildings. For more recent buildings in particular, the functioning of the building (to the extent that this reflects on its original design and planned use, where known) will also be a consideration. Artistic distinction can also be a factor relevant to the architectural interest of buildings and objects and structures fixed to them.

Historic Interest: To be able to justify special historic interest a building must illustrate important aspects of the nation’s history and / or have closely substantiated historical associations with nationally important individuals, groups or events; and the building itself in its current form will afford a strong connection with the valued aspect of history.

17. When making a listing decision, the Secretary of State may also take into account:

Group value: The extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings. Sometimes group value will be achieved through a co-location of diverse buildings of different types and dates.

Fixtures and features of a building and curtilage buildings: The desirability of preserving, on the grounds of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.

The character or appearance of conservation areas: In accordance with the terms of section 72 of the 1990 Act, when making listing decisions in respect of a building in a conservation area, the Secretary of State will pay special attention to the desirability of preserving or enhancing the character or appearance of that area.”

In addition to the criteria and general principles set out in the guidance, a number of Selection Guides for different building types have been published by Historic England in 2017. These Selection Guides provide further information regarding each building type, and demonstrate what features are considered significant and likely to make a building of special architectural or historic interest when assessing each building type.

Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment 2015

GPA Note 2 provides information to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, and marketing. It provides a suggested staged approach to decision-making where there may be a potential impact on the historic environment:

- 1. Understand the significance of the affected assets;*
- 2. Understand the impact of the proposal on that significance;*
- 3. Avoid, minimise and mitigate impact in a way that meets the objectives of the Framework;*
- 4. Look for opportunities to better reveal or enhance significance;*
- 5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;*
- 6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.*

With particular regard to design and local distinctiveness, advice sets out that both the NPPF and NPPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- *The history of the place*
- *The relationship of the proposal to its specific site*
- *The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept*
- *The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size*
- *The size and density of the proposal related to that of the existing and neighbouring uses*

- *Landmarks and other built or landscape features which are key to a sense of place*
- *The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces*
- *The topography*
- *Views into, through and from the site and its surroundings*
- *Landscape design*
- *The current and historic uses in the area and the urban grain*
- *The quality of the materials*

Historic England: Advice Note 2: Making Changes to Heritage Assets 2016

This advice note provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone. This covers different types of heritage assets, including buildings and other structures; standing remains including earthworks; buried remains and marine sites; as well as larger heritage assets including conservation areas, registered landscapes, and World Heritage Sites.

London Borough of Camden: Camden Planning Guidance, Design, 2019

This Guidance has been designed to support the policies in the Camden Local Plan 2017. It is therefore consistent with the Local Plan and forms a Supplementary Planning Document SPD. The Camden Planning Guidance covers a range of topics, for the purpose of this report Section 3 (Heritage) has been the focus, and so all of the sections should be read in conjunction and within the context of Camden's Local Plan. Camden has a rich architectural heritage and Section 3 (Heritage) aims to preserve, and where possible, enhance these areas and buildings. It notes that most works to alter a listed building are likely to require listed building consent. The section also recognises that historic buildings can and should address sustainability and accessibility and that heritage assets play an important role in the health and wellbeing of communities.

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