



**22 Tower Street,
London**

**Heritage Impact
Assessment**

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Dimension
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On behalf of:
**British Retail
Consortium**

December 2018
Report Reference:
edp5207_r001b

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Plan EDP 2	Phase Plans of the Building (edp5207_d001a 13 December 2018 LB/EO)

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For EDP use	
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Date	13 December 2018

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 support the submission and determination of a planning application and Listed Building Consent (LBC) for development at 22 Tower Street, London.
- 1.2 The HIA has been prepared in accordance with guidance set out in the *National Planning Policy Framework* (MHCLG, July 2018); 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**) comprises a single Grade II listed building and this HIA presents an assessment of impacts arising from the proposed alterations to the listed building, in relation to its ‘*special architectural or historic interest*’ and any contribution that is made to its special interest by its setting.
- 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 (above).

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 triangular plot of land and boundaries comprise Tower Street to the west, whereby the building directly fronts the street; Tower Court to the south, defined by a low wall and railings, and buildings to the north.

- 1.8 The site comprises the building of 22 Tower Street, along with an additional building within its rear curtilage. Photographs of the site and its situation are provided in **Images EDP 1 - 12.**
- 1.9 A plan, showing the arrangement of the site and wider area is included in **Plan EDP 1.**

Previous Planning History

- 1.10 The local archives contain a number of drainage plans relating to the building, dating from the early and mid-parts of the 20th century. These are useful in establishing the use and plans of the building at that time and are discussed further below.
- 1.11 A search of the planning history of Camden notes 39 applications which date from 1928 onwards.
- 1.12 The most pertinent applications relating to its current appearance, dating from the period 1988-90, are discussed in more detail below. As an outline, those of relevance comprise:
- 1980 – *“Alterations to car port and improved access to rear area, the demolition of a small rear outbuilding and erection of ground floor rear extension, together with the renovation of the railings enclosing the rear courtyard to Tower Court, including the landscaping of the courtyard.”*
 - 1988 – *“Alterations and refurbishment works including the excavation at basement level to provide additional floorspace the erection of a single storey side extension partly into the rear yard and the erection of a lift tower.”*
 - 1988 – *“1. External restoration of the building including the reinstatement of all missing features (i.e. stone copings cappings and finials etc.) 2. The net addition of one floor between the existing first and third floors and modifications to the fenestration of the rear elevation to accord with it 3. The installation of a glazed "winter garden" at second/third level front elevation 4. A single storey conservatory extension at the rear.”*
 - 1988 – *“The Erection of a storey rear conservatory extension and the installation of a glazed "winter garden" at second/third level front elevation.”*
 - 1989 – *“Excavation of basement area below rear conservatory for office use and alterations to second/third floor 'winter garden' conservatory extension on Tower Street frontage.”*
 - 1989 – *“Approval of details of the external joinery (windows) pursuant to condition 03(d) of listed building consent dated 2nd March 1989.”*

- 1989 – *“Demolition of the single storey structure and construction of LEB sub-station and the provision of one off-street car parking space and other minor alterations on south east corner of Tower Street frontage.”*
- 1990 – *“Approval of details of front railings to the windows at first second and third floor levels pursuant to additional condition 03(c) of consent granted on dated 2nd March 1989.”*
- 1990 – *“Approval of details of the proposed external metal balustrading at ground level pursuant to condition 03(c) of listed building consent dated 2nd March 1989.”*
- 1991 – *“The installation of external security bars to ground and basement windows.”*
- 1992 – *“Installation of internal partitions to fourth floor including high level glazing.”*
- 1998 – *“Internal partitioning to lower ground, third and fourth floors.”*
- 2010 – *“Replacement of existing windows to the third and fourth floor level of Tower street elevation with new timber windows.”*
- 2014 – *“Change of use and conversion from offices (B1) to 22 residential units (C3) comprising 3 x studio units, 12 x one-bed units, 5 x two-bed units and 2 x three-bed unit including removal of exiting orangery and replacement with new two storey structure (not implemented).”*
- 2018 – *“Soft strip out of non-structural 1980’s fitting.”*

1.13 The most recent Listed Building Consent was in 2014 and concerned the change of use from offices to residential and associated internal and external works. Although approved, these have not been implemented.

Proposed Development

1.14 The proposed development of the site comprises the following inter-linked applications for planning permission and Listed Building Consent (LBC). It comprises the refurbishment of the building and alterations for continuing office use. More details are provided in **Section 5**.

1.15 Plans and elevations of the proposed development are included here in **Appendix EDP 1**, which should be consulted for further information.

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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 (MHCLG, July 2018), 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 which 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* (ClfA, 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.

Listed Buildings Within the Site

- 4.3 Number 22 Tower Street is a Grade II listed building. There is also an additional building (2 Tower Court) within the curtilage which may be considered to be listed; this is discussed further below.

22 Tower Street

- 4.4 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 2pedimented 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."

- 4.5 The listing citation pre-dates the 1980s alterations, which are not mentioned. Also, notably, it states that the interior was altered by this time (1973), which pre-dates the later extensive internal alterations of the 1980s.
- 4.6 Those applications in 1988 and 1989 saw the approval and implementation of a rear glazed conservatory extension, the installation of a glazed 'Winter Garden' enclosing a former terrace on the front of the building and the insertion of a lift tower.

- 4.7 Following this, an application in 1989 included the removal of the second floor and insertion of two new floor levels within the building (the current second and third floors), and the insertion of two mezzanine floors on the top floor (one of which has subsequently been removed). At the same time, an additional row of fenestration was added to the rear elevation to account for the insertion of the new second floor level.
- 4.8 Later applications during the 1990s relate to the addition of security bars to the windows and further internal partitioning (see **Section 1**).

Historical Information

- 4.9 Information on the site's early history is sparse and there is no known published account of the history of the building.
- 4.10 The date of '1874' is inscribed on a datestone on the front of the building, with another inscribed 'LSB'. The initials stand for London School Board who built the school in 1874. The London School Board was set up in 1870 to provide school places for poor children in London. The 'Board Schools' were often known for their quality of architecture and conditions. The conservation area appraisal (Camden Council 1998) notes that, at this time, the Seven Dials area was impoverished and characterised mainly by houses which had been divided into lodgings. Such houses were apparently cleared to make way for the school building.
- 4.11 The Camden archives hold architectural plans of the buildings which are believed to date from their construction (not reproduced due to copyright). These show the building and elevations prior to the later 20th century additions. They also provide detail of the interior, demonstrating the largely open-plan nature of the building and relatively austere internal architectural treatment. They demonstrate some of the thinking behind school architecture of the day, such as high windows to prevent pupils staring too long out of the windows, and separate accesses for girls and boys.
- 4.12 It is unclear when the school closed, although drainage plans held in the archives show that in 1916 an application was submitted by 'Messrs Jurys Imperial Pictures Limited'. This suggests that the school may have been short-lived and ceased operation in the early 20th century. The plans submitted include floor plans and room uses within the building, which demonstrate the building was still fairly open plan at this time, with uses such as 'Negative Drying Room', 'Drying Room' and 'Assembling Room'. These all relate to film usage. A further drainage application was submitted by Metro Goldwyn Mayer Pictures in the 1930s. These plans relate to the third floor, and show this area subdivided and the south-eastern room entirely occupied by toilet cubicles.
- 4.13 By 1953, the premises was occupied by William Comyns and Sons, silversmiths. There is little detail of this phase of the building or when they vacated the building, although, a drainage application in 1984 for the building to the rear (2 Tower Court – see below) was noted for William Comyns Ltd. However, it is clear that by 1988 the whole premises was converted into office accommodation, as described in the applications above (see 1.12, 4.6 and 4.7).

- 4.14 In the rear yard of the site is a separate building known as 2 Tower Court and, although it is not listed in its own right, it lies within the building's curtilage. It 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 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. It is described in further detail below.

Description - Exterior

- 4.15 The exterior of 22 Tower Street is much as the listing citation, albeit there have been changes subsequent to the 1970s 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 1**).
- 4.16 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.
- 4.17 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 2**). 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.
- 4.18 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 (**Image EDP 3**). 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.
- 4.19 To the left and right are ground floor extensions which are later additions. In respect of the left hand (north-western) extension (**Image EDP 1**), there are three round headed windows which in themselves have been added later as part of the late 20th century applications. The right hand (south-east) extension contains electrical plant and is 20th century in date.
- 4.20 The rear elevation displays the same general architectural style as the front, with round headed brick arch windows (**Image EDP 4**). 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 building 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.

- 4.21 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.
- 4.22 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 (**Image EDP 5**). One panel, on the south-eastern elevation, has an angel reading a book to two children with terracotta brick surround (**Image EDP 6**).

Description - Internal Spaces

- 4.23 There is no description of the interior in the listing citation, which simply states 'altered'. This suggests that even by 1973 the interior has been altered to the degree that nothing of interest remained. The extensive alterations of the late 1980s also demonstrate the lack of interest in the interior due to the extensive changes which were allowed, and it is doubtful that any features survived even by this time. If they did, the 1980s alterations are likely to have removed the remainder, especially considering the removal of the second floor and insertion of two new floors and mezzanines.
- 4.24 The interior fabric and layout of the building was inspected, and a phase plan illustrating the likely original fabric is presented in **Plan EDP 2**, as far as could be ascertained. This demonstrates that those areas of surviving original fabric are focussed on the main structural elements of the building, comprising mainly the exterior walls, but also the two stairwells, albeit the stairs themselves are modern replacements. The majority of the current internal layout is formed by modern partitions, other than where indicated on **Plan EDP 2** (e.g **Images EDP 7-9**).
- 4.25 The interior was also inspected to identify any features or fixtures of interest. The entrance lobby has a coffered ceiling with moulded cornices, although it is also quite clear that this is modern in date and relates to a recent refurbishment of the building. Similarly, some of the interior spaces have cornicing and panelling, again, clearly of modern date. Throughout, the building has suspended ceilings, which may conceal features of interest.
- 4.26 The only observable area of interior interest is on the upper floor, where the roof structure is exposed revealing a king-post structure with curved trusses and iron tie-beams (**Image EDP 9**). Although not particularly innovative, some effort has gone into the aesthetic qualities of the roof truss and is designed to be seen. The insertion of the mezzanine into one of these areas has disrupted the former open nature of the rooms and the experience of the roof trusses.

Significance

- 4.27 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 on the interior of the building.
- 4.28 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 19th 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.
- 4.29 There is no evidence for any archaeological interest.
- 4.30 As such, significance is invested with the external fabric of the building; however, it is also noted that there are parts of the building which make a negative contribution to the significance of the building, these being:
- a. The 1980s conservatory and 'Winter Garden', by virtue of the poor quality materials and appearance. In the case of the 'Winter Garden', this also obscures architectural features of interest.
- 4.31 Thus the proposals represent an opportunity to enhance the building, by addressing these factors.

2 Tower Court

- 4.32 In the rear former yard area of the building 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 10**). There is a modern conservatory projection on the ground floor covering the entrance.
- 4.33 The interior of the building is of a simple one-room plan, with a staircase section leading into two rooms on each level. None of the rooms have any notable interior features.
- 4.34 The basement level has been dug out beneath the conservatory above, formerly being a lightwell but now enclosed and enlarged to form a larger basement room.
- 4.35 The building is invariably referred to as the 'School House' on a 1987 application, and 'School Keepers House' on a 1985 drainage application. As such, there is a functional connection to the school although the building may be earlier.

- 4.36 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. Its historic interest stems from its relationship with the school building and its related functional role. There is no evidence for any archaeological interest.
- 4.37 Due to its functional and historical role in relation to the listed school building, it could be considered to be listed by curtilage. Nonetheless, in terms of its significance, due to the lack of architectural interest this remains at the local level.

Seven Dials Conservation Area

- 4.38 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.
- 4.39 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 17th century.
- 4.40 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”*.
- 4.41 The CAS then defines the character of the areas on a street-by-street basis. It 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”*.
- 4.42 It also describes Tower Court, noting it *“as a pleasant narrow pedestrianised street lying between Tower Street and Earlham 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 (**Image EDP 11-12**). These form the boundary of the site.
- 4.43 No mention is made of the later conservatory and ‘Winter Garden’ additions to the school building in terms of their contribution to the conservation area, although it does not mention them as negative features. However, their 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.
- 4.44 No mention is made either of 2 Tower Court, although it could be said to make a positive contribution to the general intimate character of the Tower Court townscape.

- 4.45 Overall, despite the negative influence of the conservatory and 'Winter Garden', 22 Tower Street and 2 Tower Court make a positive contribution to the conservation area. The building is mentioned specifically in the CAS and it is considered that the style and scale of the building is one of the defining characteristics of the street.

Listed Buildings Beyond the Site

- 4.46 There are two 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 5-8 Tower Court (**1379041**) and 10 Tower Court (**1379043**). These two listed buildings are located on Tower Court, to the east of the site, and their frontages overlook the rear yard area (see **Plan EDP 1**).

5-8 and 10 Tower Court

- 4.47 5-8 Tower Court (**1379041**) is a Grade II listed building located adjacent to the 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 18th century with mid-19th and 20th century alterations.

- 4.48 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."

- 4.49 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."

- 4.50 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. 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.

- 4.51 In terms of their setting, they are located on the passage of Tower Court, with the rear of 22 Tower Street, rear yard and conservatory located opposite, along with the low wall and railings. The school itself was built after these buildings and somewhat overshadows them, but this in itself 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.
- 4.52 Nonetheless, the existing conservatory extension of the school 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.
- 4.53 The low wall and railings form part of the overall character of Tower Court. Although set within a 20th century wall, the railings are of a design which is complimentary to the character of Tower Court. Although not actively contributing to the significance of the listed buildings, they do provide a positive contribution to their experience.

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 The details of the proposals are included in **Appendix EDP 1**.

22 Tower Street

External Alterations

- 5.3 The proposals envisage some changes to the exterior of 22 Tower Street. These can be summarised as:
- a. Replacement of the existing conservatory and replacement with new two storey extension;
 - b. Removal of 'Winter Garden' and replacement with communal terrace;
 - c. Addition of first floor 'infill' extension to the left of the building;
 - d. Alterations of windows to the left hand single storey section of the building;
 - e. Removal of later security bars;
 - f. New gated entrance from Tower Court; and
 - g. Replacement window frames to rear (details to follow).
- 5.4 The replacement of the existing conservatory (Point a) is the biggest single external change. The principle for its demolition and replacement with a two storey contemporary structure is established within the existing listed building consent for conversion to residential accommodation (2014/3431/L).
- 5.5 The replacement structure has undergone a rigorous design exercise which is detailed within the Design and Access Statement. The result is a bespoke contemporary structure, of a generous one storey which has been designed to reveal more of the rear elevation of the building from rear vantage points. It is both smaller in height and footprint to the existing structure and represents an improvement in the quality of materials and massing. As such, due to the removal of a structure of poor quality, this change represents an enhancement to the listed building.
- 5.6 On the street elevation, it is proposed to replace the curved 'Winter Garden' glazing with an open communal terrace (Point b). In a similar vein to the rear conservatory, this element

is built of poor quality PVC materials and its appearance makes a negative contribution to the listed building.

- 5.7 The proposals involve opening the area as a terrace, which is something more akin to the likely original useage. A simple metal rail balustrade would replace the existing curved glazing and hardwood painted doorsets will be reinstated within the large arched openings.
- 5.8 This element of the proposals represents an enhancement to the listed building by removing an intrusive element from the main elevation and reinstatement of the original façade of the building. This would reveal a key central tenet to the architecture of the building through the revelation of former openings to be visible from the street frontage. It also allows a greater unity of the central three bays of the building to be better appreciated.
- 5.9 In terms of the changes to the left-hand single storey section of the building (Point 3), these involve a first floor contemporary extension and the existing window openings dropped to floor level (Point c).
- 5.10 The analysis in **Section 4** has shown that this section of the building was added later, and appears to have been in use as a garage prior to conversion in the 1980s, at which point the windows were added. In this respect, the proposed window alterations are not affecting the significant historic fabric of the building and would cause no harm.
- 5.11 In terms of the proposed extension, the Design and Access Statement details the design considerations. This include careful scaling, which sits below the first floor string course of the school building. The visualisations of the street scene in the Design and Access Statement illustrate how the building has been set back, clearly respecting the hierarchy of buildings in relation to the school and streetscene. The vertical geometric openings maintain a consistent language with those on the school building. The materials will utilise a light material palette, which contrasts and emphasises the architectural dominance of the listed building and appear subordinate in nature.
- 5.12 Overall, the design has carefully considered the listed building, and it is considered entirely appropriate within its setting as characterised by the variety in the wider conservation area. As such, the first floor infill extension, is considered to cause no harm to the listed building.
- 5.13 It is proposed to remove the current security bars (Point d) from the windows. Previous applications have demonstrated these to be modern, making a negative contribution to the building by their unsympathetic style. The removal of these will revert the building back to original condition and is considered to be an enhancement to the listed building.
- 5.14 The remaining impacts relate to addition of the gate within the railings along Tower Court (Point e). This is designed to be a single pedestrian gate, flush with the railings, and resulting in the removal of a small part of the modern plinth walling. These will not affect the listed building or its setting, and will cause no impact in that regard.

Fabric and Layout Alterations

- 5.15 As far as alterations to the existing interior fabric are concerned, the proposals entail the re-configuration of the interior space comprising:
- a. Removal of the central lift shaft;
 - b. Removal of one flight of later stairs and replacement with lift;
 - c. Removal of later interior partitions;
 - d. Removal of small sections of original wall to create new openings; and
 - e. Removal of mezzanine on the fourth floor.
- 5.16 Given that there is little historic or artistic interest in the interior, the above removals of fabric relate to later, 1980s/90s, inserted partitions. As such, they will result in no harm to the special interest of the building.
- 5.17 Indeed, the removal of the partitions and central lift to create the new, open plan layout, would more closely resemble the original layout of the school. The removal of the mezzanine will also open the roof space out to its original proportions and provide an enhancement to the experience of the roof structure.
- 5.18 Overall, it is considered that the proposals result in an enhancement to the interior of the listed building, through the reversion to a plan form close to the original, and the revealing of the roof trusses on the fourth floor.

Conservation Area

- 5.19 In terms of changes to the conservation area, these relate solely to the external alterations. These comprise the replacement of the conservatory, the removal of the 'Winter Garden', the additional first floor storey to the north-west and the new gated entrance on Tower Court.
- 5.20 As discussed in relation to the listed building above, the principle for the demolition of the conservatory and replacement with a two storey contemporary structure is established within the existing Listed Building Consent (2014/3431/L). Furthermore, the CAS recognises the role modern development can play, in that "*Appropriate design for the Conservation Area can reflect both the historic and the modern context and both traditional and contemporary materials may be appropriate.*"
- 5.21 In common with the impacts on the listed building, it is considered that the removal of the poor quality existing conservatory and the replacement with a well thought-through contemporary design, utilising high quality materials and massing, represents an enhancement to the conservation area.

- 5.22 Likewise, in relation to the 'Winter Garden' the poor quality appearance makes a negative impact on the conservation area. The removal of this structure would offer an enhancement to the conservation area, by removing a feature of poor quality materials which detracts from the character and appearance of the conservation area in this location.
- 5.23 In terms of the first floor extension, in common with the impact on the listed building, the contemporary approach relates to the diverse mix of ages and styles, which is identified within the CAS as one of the defining characteristics of the area. It is considered that the careful design and high-quality materials are entirely appropriate within the streetscene and would preserve (and/or enhance) the special character of the conservation area.
- 5.24 The remaining impacts relate to the addition of the gate within the railings along Tower Court. This is designed to be a single pedestrian gate, flush with the railings, and resulting in the removal of a small part of the modern plinth walling. In relation to the conservation area, the adopted CAS recognises these traditional style railings and brick wall as enhancing the conservation area. The analysis above identifies that the brick wall is at least of 20th century – it does not appear on a photograph from the 1960s. As such, the loss of a small section of wall would not cause an adverse impact on the conservation area. Likewise, although the additional gate would be a change, it is considered that the overall appearance of the railings within Tower Court would not be compromised, causing no harm in that regard.

Surrounding Heritage Assets

- 5.25 Insofar as the setting of the adjacent listed buildings of 5-8 and 10 Tower Court are concerned, the elements of the proposals which could affect this comprise the replacement of the rear conservatory and the addition of the gate in Tower Court.
- 5.26 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. Considering the design response of its replacement (see above) it is considered that the new structure would offer an enhancement in this regard, through the use of quality design architecture and appropriate materials.
- 5.27 With regards to the addition of the gate in the railing opposite, it is considered that the overall appearance of the railings, in relation to the positive role they play in the experience of the listed buildings, would not be compromised. As such, the additional of the small pedestrian gate would cause no harm to the adjacent listed buildings.

Section 6

Conclusions

- 6.1 In line with Paragraph 189 of the NPPF (2018), this report has described the significance of the heritage assets affected, including the contribution made by their setting, and assessed the proposals in terms of their potential impact.
- 6.2 One listed building has been identified as being directly affected by the proposed development, which comprises the Grade II listed 22 Tower Street, whilst two others 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 22 Tower Street, 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 has been extensively altered, including the removal and insertion of entire floors in the late 1980s. The upper floor is partially exposed to the roof truss, which is the only internal feature of some interest. The assessment also identifies three negative features in relation to the building, these being the rear conservatory and front 'Winter Garden', which are of poor quality materials and appearance, and the later internal partitioning which subdivides the former classroom spaces.
- 6.4 This report concludes that there would be an enhancement to the Grade II listed building through the replacement of the rear conservatory, the removal of the 'Winter Gardens' and the reversion of some of the internal partitioning, opening up the former spaces.
- 6.5 It is also considered that other elements of the scheme, comprising the addition of a first floor extension and a new pedestrian gate, will cause no harm to the listed building.
- 6.6 Additionally, the proposals are considered to be an enhancement to the character and appearance of the conservation area, due to the removal/replacement of the poor quality conservatory and 'Winter Garden' elements. Similarly, the replacement of the rear conservatory is considered to enhance the experience of the adjacent listed buildings.
- 6.7 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: 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 2: 22 Tower Street from the south-west, looking north-east. Showing the main entrance.



Image EDP 3: 22 Tower Street, showing the upper portion of the main elevation, including the 1980s 'Winter Garden'. Looking north-east.



Image EDP 4: Rear Elevation of 22 Tower Street from Tower Court, looking south-west. The late 1980s conservatory extension can be seen to left.



Image EDP 5: Detail of one of the relief panels with foliate decoration on the main south-western elevation.



Image EDP 6: View of the south-eastern elevation, showing the blank doorways to right and relief panel to left.



Image EDP 7: Representative view of the interior. This view shows the lobby with modern coffered ceiling and the inserted lift.



Image EDP 8: Representative view of the interior, showing the effect of the later partitioning and the inserted floor level.



Image EDP 9: Representative view of the interior, showing the internal partitions and exposed roof truss on the fourth floor.



Image EDP 10: 2 Tower Court, looking north-west.



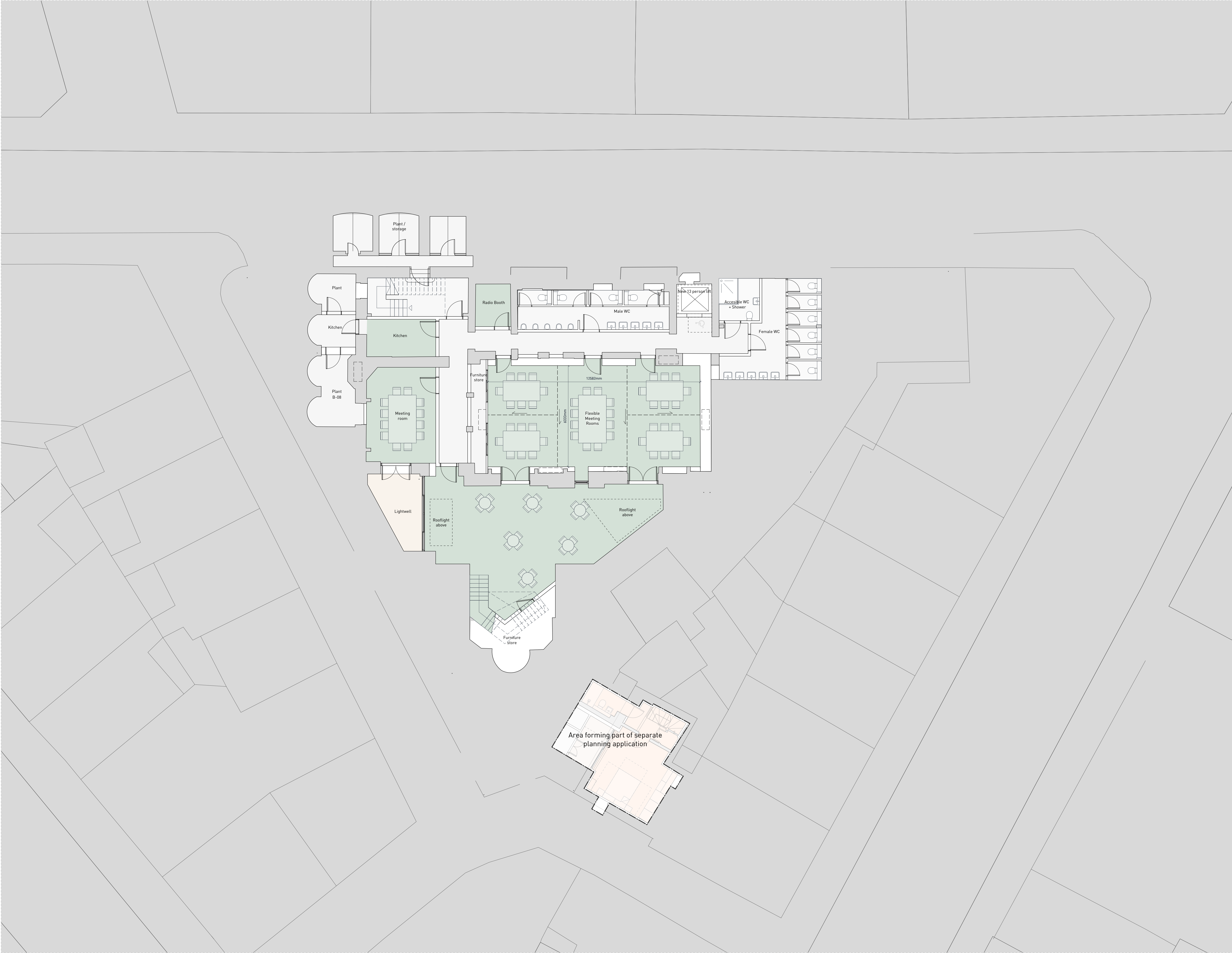
Image EDP 11: Tower Court, showing the listed buildings of 5-8 and 10 Tower Court to left, and the railings forming the boundary of the site to the right.



Image EDP 12: 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.

Appendix EDP 1
Plans, Elevations and Images Showing the Proposals
(Drawings 18010_GA.01 – 07)

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NOTES

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22 TOWER STREET

CLIENT - BRITISH RETAIL CONSORTIUM

PROPOSED BASEMENT FLOOR PLAN

STATUS - PLANNING

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PROPOSED GROUND FLOOR PLAN

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PROPOSED FIRST FLOOR PLAN

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PROPOSED SECOND FLOOR PLAN

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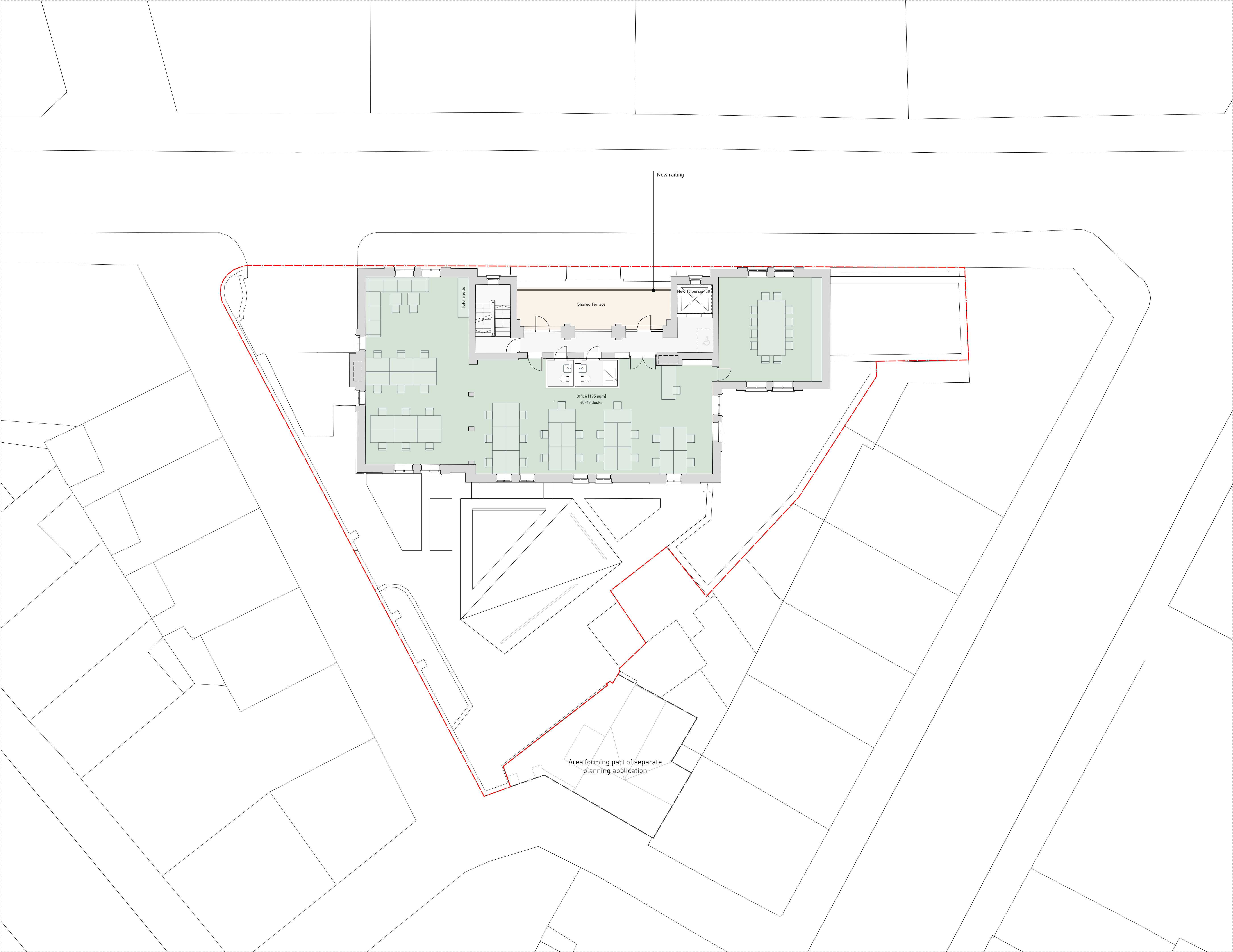
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22 TOWER STREET

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PROPOSED THIRD FLOOR PLAN

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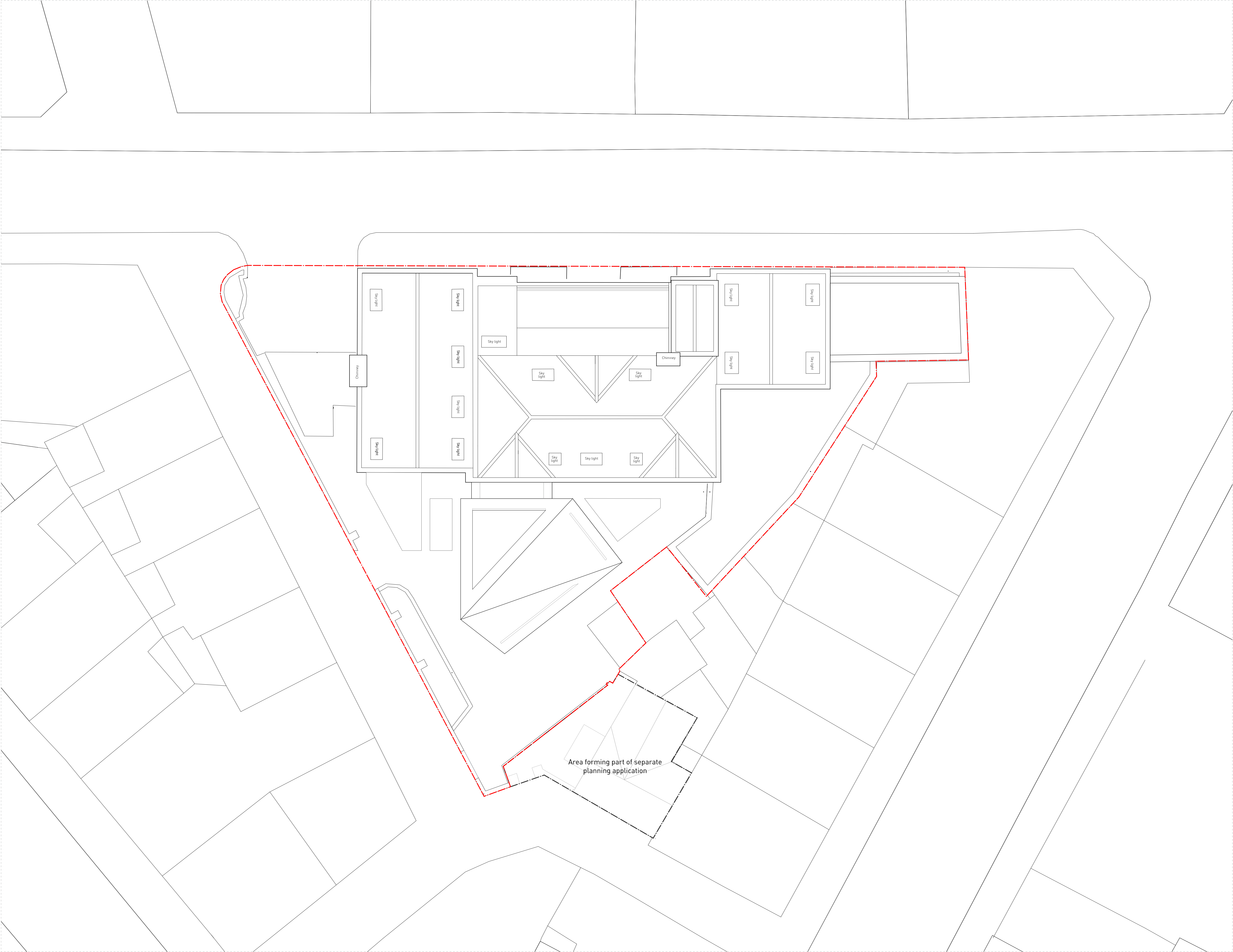
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PROPOSED FOURTH FLOOR PLAN

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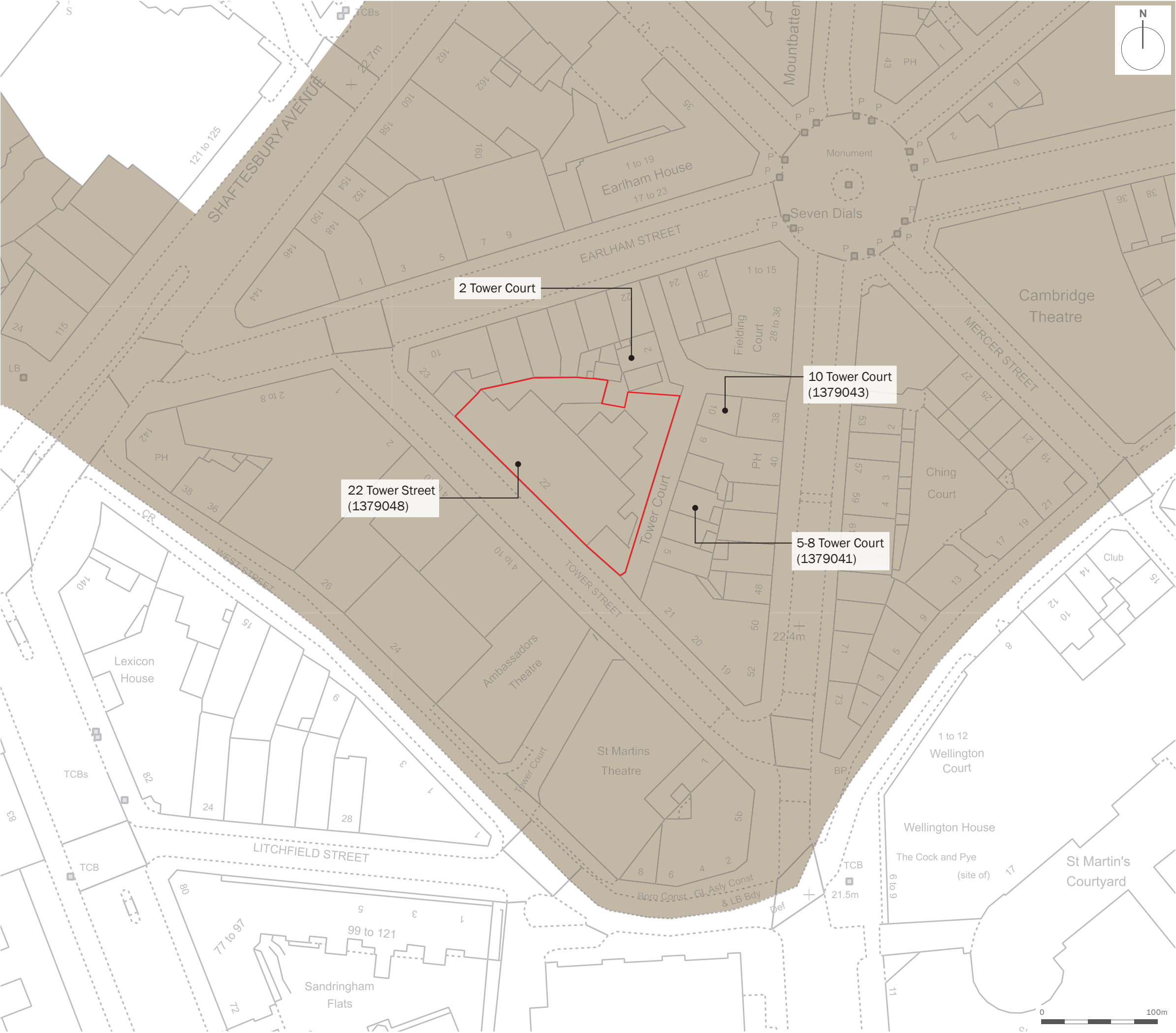
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Site Boundary

Seven Dials Conservation Area

client

British Retail Consortium

project title

22 Tower Street, London

drawing title

Plan EDP 1: Location of Site and Heritage Assets Discussed in the Text

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13 DECEMBER 2018

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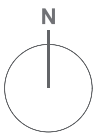
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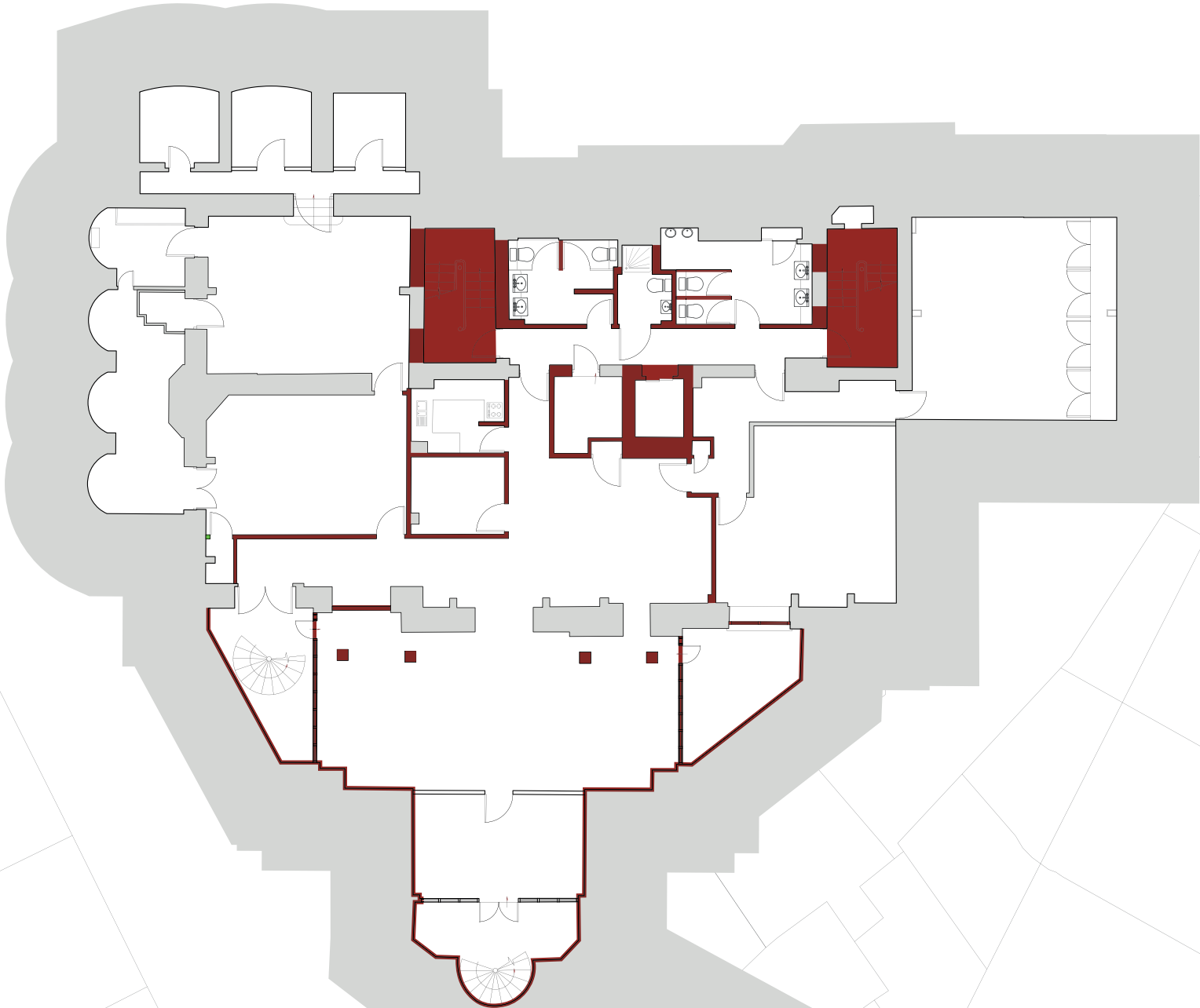
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Shrewsbury 01939 211190

Basement



Late 20th Century Additions



Area forming part of separate
planning application

client

British Retail Consortium

project title

22 Tower Street, London

drawing title

**Plan EDP 2: Phase Plans of the Building
(Sheet 1 of 6)**

date

13 DECEMBER 2018

drawn by LB

drawing number

edp5207_d001a

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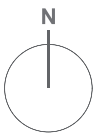
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PRACTICE



Ground Floor



- Early/Mid 20th Century Additions
- Late 20th Century Additions



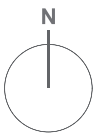
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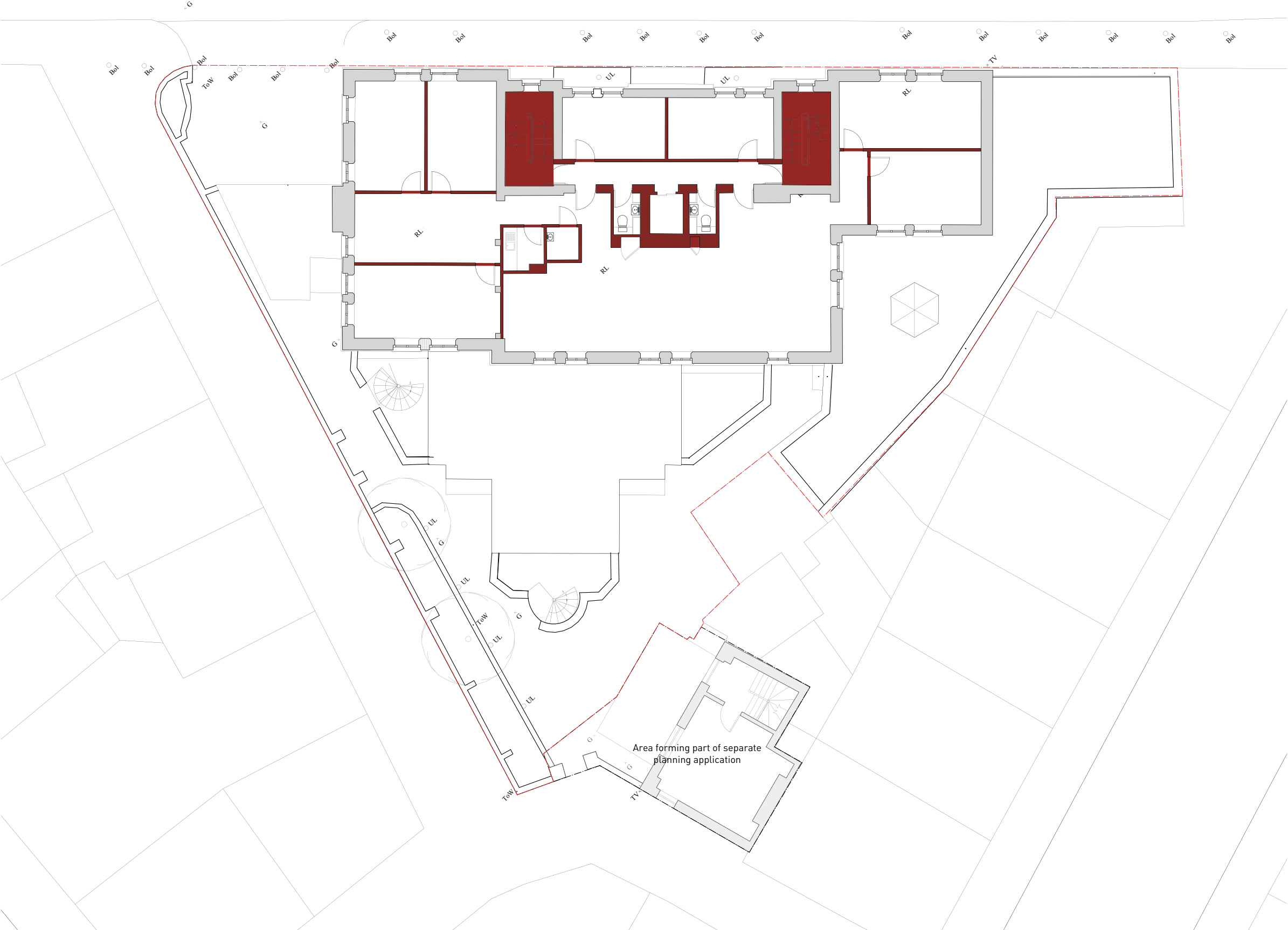
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 Late 20th Century Additions



client
British Retail Consortium

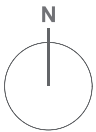
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drawing title
**Plan EDP 2: Phase Plans of the Building
(Sheet 3 of 6)**

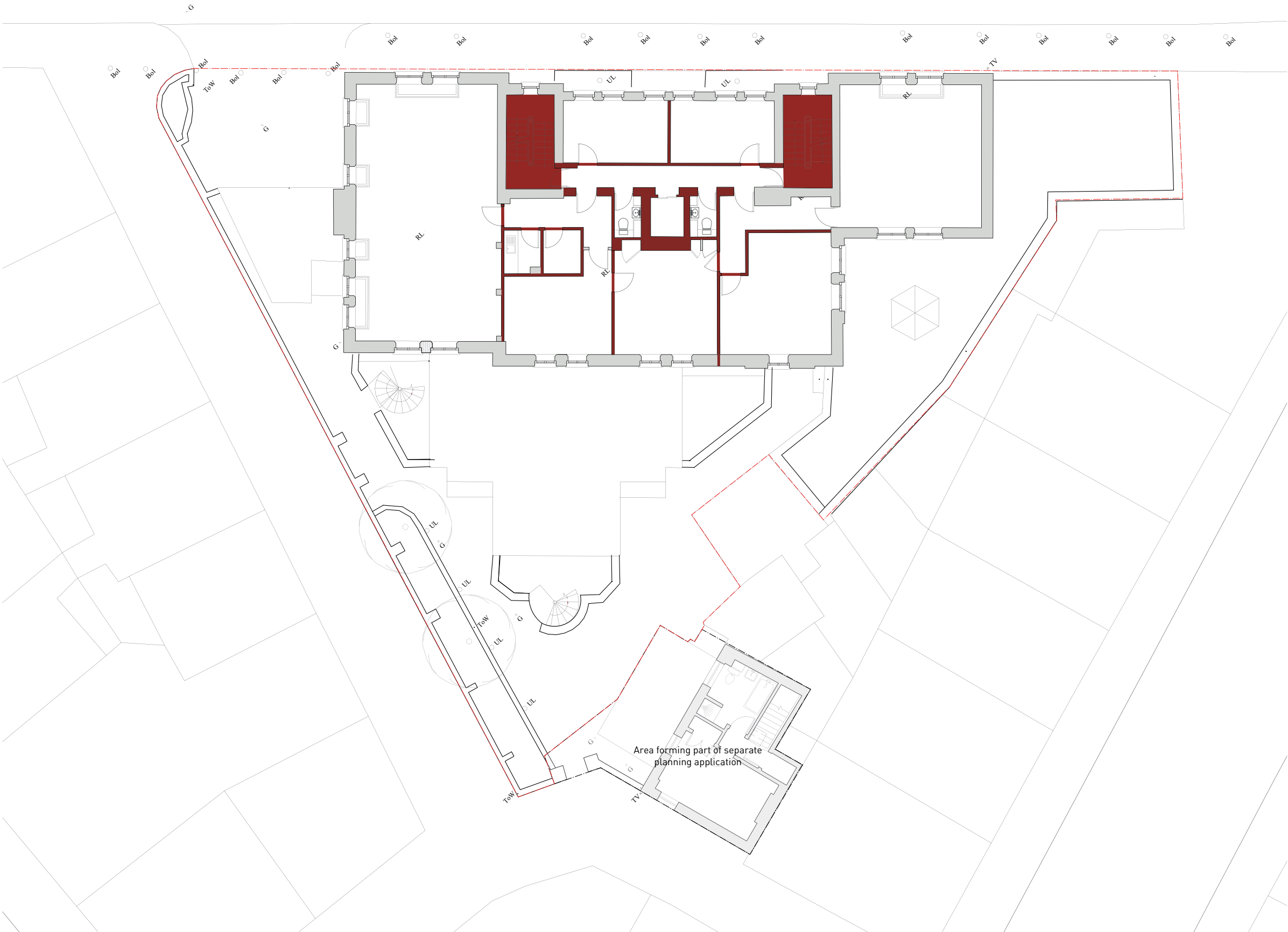
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drawing number	edp5207_d001a	checked	EO
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Late 20th Century Additions



client
British Retail Consortium

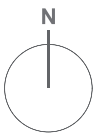
project title
22 Tower Street, London

drawing title
**Plan EDP 2: Phase Plans of the Building
(Sheet 4 of 6)**

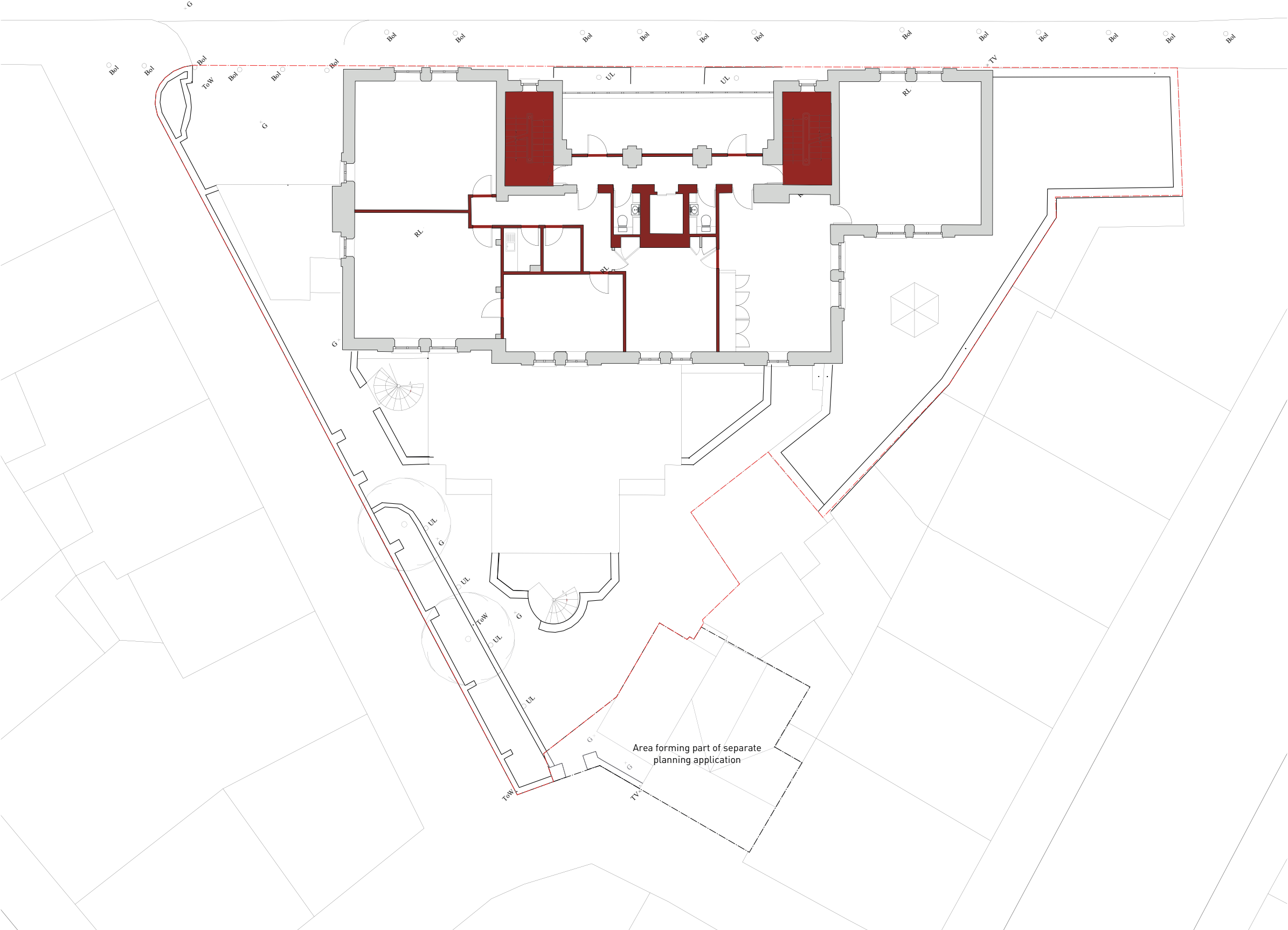
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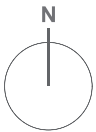
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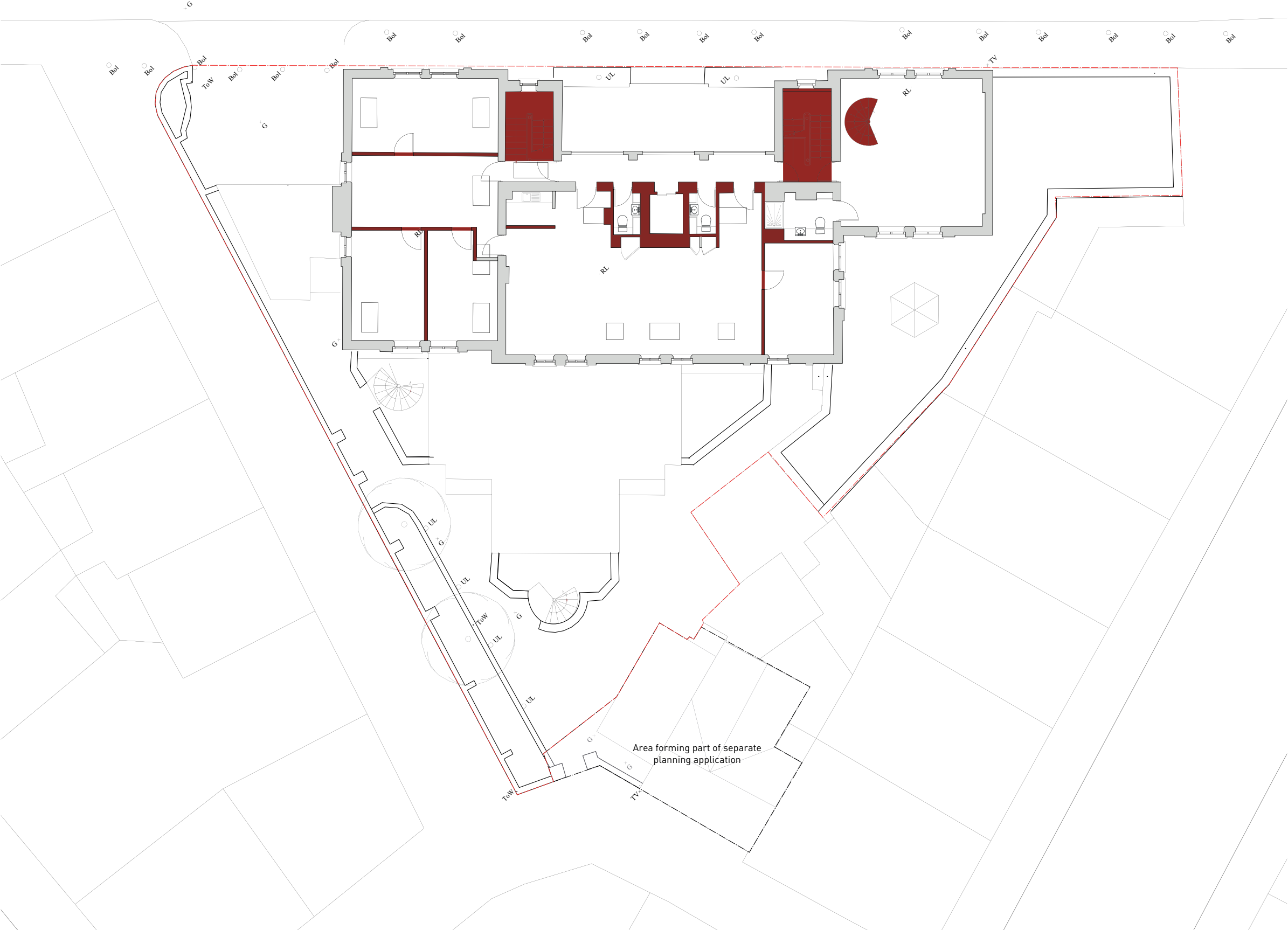
client			
British Retail Consortium			
project title			
22 Tower Street, London			
drawing title			
Plan EDP 2: Phase Plans of the Building (Sheet 5 of 6)			
date	13 DECEMBER 2018	drawn by	LB
drawing number	edp5207_d001a	checked	EO
scale	Not to scale	QA	JTF



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client
British Retail Consortium

project title
22 Tower Street, London

drawing title
**Plan EDP 2: Phase Plans of the Building
(Sheet 6 of 6)**

date	13 DECEMBER 2018	drawn by	LB
drawing number	edp5207_d001a	checked	EO
scale	Not to scale	QA	JTF



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