

# Heritage Statement

## *Phase 3i – Alfred Mews Reception*

Heals Building, 196 Tottenham Court Road,  
W1T 7LQ

May 2022

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# 1. Introduction

## Purpose of this Report

### Application Scheme and Heritage Impacts

- 1.1 This Heritage Statement report has been prepared by Turley Heritage on behalf of General Projects (our 'Client' and the 'Applicant') to provide a proportionate understanding and appreciation of the significance of the identified built heritage asset(s), and also then to describe the likely heritage impacts of the proposed works of alteration to the Grade II\* listed Heals Building complex, 196 Tottenham Court Road (the 'Site').
- 1.2 This report accompanies an application for Listed Building Consent for proposed works to the Alfred Mews Reception at the Heals Building. This work forms part of an application for the refurbishment of existing loading bays & associated back of house spaces on Alfred Mews into reception spaces for the Heal's Building. Importantly, these works form part of a wider vision and strategy by our Client to sensitively reinvigorate the use and appearance of this unique collection of built elements that are focussed around the historic Heals building. The stage of works that is the subject of this current application is referred to as Phase 3i (Alfred Mews Reception).
- 1.3 This report should be read in conjunction with the application submission design material for this scheme, as prepared by the architects Buckley Gray Yeoman (BGY), including proposed (annotated) drawings and their supporting Design and Access Statement (DAS). The DAS supports our own assessment of the heritage impacts of this scheme in describing how these carefully considered internal and external alterations will enliven this current back of house space into a modern accessible workplace entrance & associated amenity space for the growing commercial offer. As part of a sensitive and focussed design approach, this phase of enhancements will work with and enhance the existing building fabric, by removing damaging modern interventions & restoring the historic facade on Alfred Mews, and also provides the opportunity to deliver a number of heritage benefits for the use and design of the listed building.

### Pre-Application Engagement

- 1.4 Importantly, this scheme has been subject to a process of pre-application engagement with officers at the local planning authority the London Borough of Camden (LBC), and also Historic England (HE). This process has introduced the wider vision for the use and revitalisation of the Site, as well as the various intended phases of works that will be implemented to achieve this. At this stage officers at LBC have raised no objection to, but have offered support for, the principle of these proposals at Stage 3i (Alfred Mews Reception) (online meeting attended by the LBC and HE 5 April 2022). During extended pre-application discussions with both the LBC and HE, both parties have also expressed support for the principle of the Applicant's wider vision for the Heals Building.

## Legislation and Planning Policy Context

- 1.5 The requirement for this report stems from the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires that special regard be paid to the desirability of preserving the special architectural or historic interest of a listed building or its setting. The Act also requires that the decision-maker pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 1.6 The National Planning Policy Framework (NPPF) 2021 provides the Government's national planning policy of the conservation of the historic environment. In respect of information requirements, 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 ...'*<sup>1</sup>
- 1.7 Paragraph 195 then 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.
- 1.8 The relevant heritage legislation, planning policy for guiding change within the historic environment is set out in full within the founding Baseline Heritage Appraisal report, which is included in full at **Appendix 1** for ease of reference.

## Structure of this Report

### Baseline Conditions

- 1.9 To address the relevant legislative and policy requirements, **Section 2** of this report firstly identifies and confirms the heritage asset (or assets) within the Site or its vicinity; the significance of which would likely be affected by the proposed scheme. This section establishes a description of the built heritage baseline conditions for the Site and these proposals. This includes a statement of heritage significance for the identified listed building on Site as well as the surrounding conservation area, as recommended by national best practice guidance.
- 1.10 As background, Turley Heritage were first instructed in 2021 to provide our Client (and their design team) with both advice in relation to their emerging proposals for the future of the Heals Building. This was based in part on our previous experience working with this listed building, and also our extensive experience managing change for heritage buildings and areas within the LBC local planning authority area. The first step for our team has been to undertake targeted research and also on-site survey and analysis in order to better understand the historical development of this complex, and also its distinctive architectural character as a multi-phase collection of different built

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<sup>1</sup> MHCLG, National Planning Policy Framework (NPPF) 2021 – para. 194

elements. This is the basis upon which a statement of heritage significance has been drafted for the listed building, which is contained within our first stage Baseline Heritage Appraisal report (dated December 2021). This baseline understanding has been, and will continue to be, used actively to further inform and also guide the design process for the optimisation of the use and sensitive adaptation of this historic building.

- 1.11 **Section 2** of this application stage report draws directly from our founding Baseline Heritage Appraisal report, which is included in full at **Appendix 1** for ease of reference and completeness. It is on this basis that the potential impacts of the application scheme of works have been assessed.

### **Assessment of Impacts**

- 1.12 **Section 3** then provides our description of the likely heritage impacts of the application scheme (Phase 3i (Alfred Mews Reception)) on the significance of the listed building. These impacts are also assessed overall in light of the relevant statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy contained within the NPPF 2021 and supported by the NPPG, and local planning policy (the Development Plan) for change within the historic environment.

### **Conclusion**

- 1.13 It is the conclusion of this report, and our heritage impact assessment, that the proposed scheme of works (Phase 3i) for the refurbishment of existing loading bays & associated back of house spaces on Alfred Mews into reception spaces for the Heal's Building would conserve this designated heritage asset, as well as the surrounding Bloomsbury Conservation and also both sustain and enhance their significance.

## 2. Heritage Asset and Significance

### Heritage Asset

- 2.1 The National Planning Policy Framework (NPPF) 2021 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing)”.*<sup>2</sup>

### 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 that involve them. This includes statutory listed buildings.

### Listed Building

- 2.3 The Site is located within the Heal and Son Ltd building which was listed Grade II\* in 1974 and also for group value. The formal List Entry is included in full as part of our appended Baseline Heritage Appraisal report. It is the view of the local planning authority that proposed change as a result of this application scheme on Site would likely have a direct impact on the significance of this listed building, which is both a legislative and also a material planning consideration.

### Conservation Area

- 2.4 The site is located within the Bloomsbury Conservation Area, which was first designated in 1968 by the London Borough of Camden with the aim of preserving elements of the prevailing Georgian townscape. Subsequent boundary alterations have sought to incorporate the Victorian, Edwardian and 20th century architecture also present in the enlarged conservation area.

### Heritage Significance

- 2.5 The NPPF also defines the significance of a heritage asset as:

*“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.”*<sup>3</sup>

- 2.6 Historic England has published guidance with regard to the preparation of statements of heritage significance, and how the proper analysis of the significance of heritage assets should be used to inform an assessment of impacts on that significance as a result of proposed change.<sup>4</sup>

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<sup>2</sup> MHCLG, National Planning Policy Framework (NPPF) 2021 – Annex 2: Glossary

<sup>3</sup> MHCLG, National Planning Policy Framework (NPPF) 2021 – Annex 2: Glossary

<sup>4</sup> Historic England: Advice Note 12: Statements of Heritage Significance 2019

- 2.7 Historic England has also in the past provided further guidance for their staff (and others) on their approach to making decisions and offering guidance about all aspects of England's historic environment<sup>5</sup>. This provides advice on how to assess the contribution of elements of a heritage asset, or within its setting, to its significance in terms of its "heritage values". These include: evidential, historical, aesthetic and communal. This supplements the established definitions of heritage significance and interests set out in founding legislation and more recent national planning policy and guidance.

## **Designated Heritage Assets**

### ***Listed Buildings***

- 2.8 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<sup>6</sup> and supported by Historic England's Listing Selection Guides for each building type<sup>7</sup>.

### ***Conservation Areas***

- 2.9 Conservation areas are designated by virtue of their special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Guidance has been published in respect of conservation areas by Historic England, and this provides a framework for the appraisal and assessment of the special interest and significance of a conservation area.<sup>8</sup>

## **Statement of Heritage Significance**

- 2.10 **Appendix 1** to this report is our full founding Baseline Heritage Appraisal report. This includes a description of the historical development of the Site to establish context, and also a more focussed statement of heritage significance for each of the identified and relevant heritage assets to the Site and its future use / development. This analysis has been undertaken on the basis of review of existing published information, focussed desktop and archival research, and our own on-site visual survey and analysis.
- 2.11 This baseline analysis includes a statement of heritage significance for the Grade II\* listed building (Heals Building) on Site. This is proportionate to the importance of the relevant heritage asset, and also provide a sufficient level of description to understand its relative significance, sensitivity and heritage interests; as a whole and also as part of a complex multi-phase collection of built elements, and in light of future envisioned change for the Site. This full statement of heritage significance for the listed building is not repeated in this report, but summarised below. It is on this basis that the potential impacts of the application scheme of works have been assessed.

### **Heals Building (Listed Building: Grade II\*)**

- 2.12 Our detailed analysis of the designated heritage asset of this listed building has identified that; notwithstanding the exterior, its significance is also derived from key

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<sup>5</sup> English Heritage (now Historic England) Conservation Principles: Policies and Guidance 2008

<sup>6</sup> DCMS. Principles of Selection for Designating Buildings, 2018

<sup>7</sup> Historic England. Selection Guides 2011 (and updated)

<sup>8</sup> Historic England, Advice Note 1, Conservation Area Designation, Appraisal and Management. 2019 (2nd Ed.)

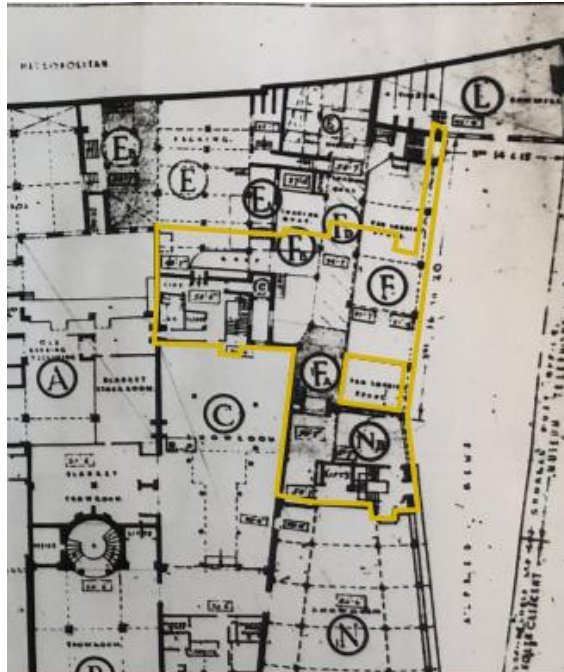
elements of its historic plan form and quality internal fabric and features. These help to illustrate its former use and also complexity of functions across the site.

- 2.13 The areas or elements of greater heritage significance are those more public retail areas (at ground floor level and also towards the Tottenham Court Road frontage) related to the Heals store as part of its early 20<sup>th</sup> century and inter-war phases. Of particular interest internally are the part original spiral staircase deeper within the plan of the early 20<sup>th</sup> century building, and also the 1930s stair and lift core to the south west corner of the block. The basement and other upper storey levels within the main store (and also the 1960s extension) are as a general rule of lesser heritage interest by comparison with the main retail space at ground floor and the key circulation areas.
- 2.14 To the rear and within the depth of the Site (and also at the end of Alfred Mews), remnants of the earlier phase 19<sup>th</sup> century store and its workshops / factory (and also intervening yards) are legible alongside the later redevelopments. These elements also hold a moderate degree of heritage interest, but are otherwise more utilitarian in character and or have experienced a greater degree of alteration from that historic.
- 2.15 Across the entire Site there is clear evidence of more modern interventions as each of the different internal spaces have been variously adapted and successively refurbished for changing uses and also new tenant occupiers. Existing modern introductions such as office partitioning, kitchen and bathroom facilities, flooring and services are of no special interest.

#### ***Application Site***

- 2.16 The area of the Site that is proposed to be changed as part of this application scheme is located within the south-eastern corner of the ground floor level, facing Alfred Mews. This area is characterised as an industrial service area for the Heal's Complex some of which dates from the 19<sup>th</sup> century and was subsequently upgraded throughout the key phases of later development. The statement of heritage significance provides a more detailed description of the complex multi-phase development of this collection of building elements over time, which is not repeated here (but appended in full).
- 2.17 The scheme of works of refurbishment proposed for this area within the Site is referred to as Phase 3i (Alfred Mews Reception) for the purposes of this application.
- 2.18 This area at ground floor level includes elements from a number of different historical stages in the evolution of this building. This includes fabric from the earliest phase of the complex, which was then heavily altered as part of the 1916 Smith & Brewer designed Heals Store at the centre of the Tottenham Court Road frontage, which also reached back into the depth of the plan. Later alterations to this area were also carried out in the 1930s extension by Sir Edward Maufe to the south and along Alfred Mews.
- 2.19 Figure 2.1 is an extract from a simplified drawing plan of the Heals Building dating from 1937 (just after the extension of the earlier 20<sup>th</sup> century store), which shows the extent of the application Site at ground floor level. This drawing indicates that the Site area featured a much more open plan form and also demonstrates the introduction of a ramp to provide access to the western end of the complex. The other 19<sup>th</sup> and early or interwar 20<sup>th</sup> century spaces were secondary in importance and use as ancillary storage at this time.





**Figure 2.1: Extract of 1937 Ground Floor Plan (with outline of phase demise)<sup>9</sup>**

2.20 As found today, these areas of the ground floor level remain in use by Heals and accordingly retain a level of historic interest through that association and function. This industrial/service area towards the Alfred Mews frontage is considered more important historically, relative to the back of houses spaces deeper within the plan, where they demonstrate the inter-relationship between manufacture and design, which was central to Heals. However, this significance has been diminished by more recent refurbishments and the modern metal roller shutters (Figure 2.2). Furthermore, the interior spaces have a simple, utilitarian, character internally, which has largely been determined by more recent refurbishment of the office/service spaces with modern materials, fixtures and fittings within the somewhat retained historic plan form and structure at this level. This is an area of lesser heritage significance within the context of the listed building as a whole, and therefore also less sensitive to further change, and where it has been subject to a greater degree of alteration in the past.

Nonetheless, there are a number of historic features within this area of the building which are considered to contribute to the significance of the Heal's Complex overall. These include industrial details such as a steel gantry crane, historic timber sliding doors, and cast iron columns (Figure 2.3). These remaining historic features contribute greatly to the special interest of the listed building where they demonstrate the inter-relationship between manufacture and design, which was central to Heals.

<sup>9</sup> City of London (London Metropolitan Archives)



**Figure 2.2:** Existing loading bay with modern partition and metal roller shutters



**Figure 2.3:** Existing historic industrial details including steel gantry crane (left), historic timber sliding doors (centre), and cast iron columns (right)

2.21 Again, our founding statement of heritage significance for the listed building provides a more detailed description of the complex multi-phase development of this collection of building elements over time. This is appended in full to this report. The relative contribution of the different elements and areas of this building to the heritage significance of the whole is most helpfully illustrated through a series of annotated floor plans, or “traffic light plans”, in light of the age, type, form and scale of this specific building. The plan (Figure 2.4) is included here for ease of reference, albeit only for the relevant ground floor level to this application Site and proposals. The key used is as follows:

- **Pink** – original element / area of importance / public use and / or quality, and therefore highest contribution to significance;

- **Orange** – original element / area of interest, but of secondary importance in terms of use and / or quality, and therefore of lesser relative contribution to significance;
- **Green** – other early/original element of even lower status and / or quality, including areas of highly standardised / repetitive form and character, and therefore of only modest contribution to significance; and
- **Blue** – element / area with no or negligible contribution to significance, such as minor original feature that may have been compromised by later alteration, or unsympathetic later interventions that detract.



**Figure 2.4: Ground Floor Level: Relative contribution of elements / areas to significance**

**Bloomsbury Conservation Area**

- 2.22 Overall, the significance of the Bloomsbury Conservation Area is as a large townscape area comprising a series of planned elements of formal townscape as the city of London expanded northwards during the 17th and 18th centuries, and later redevelopments of the 19th to 21st centuries.
- 2.23 It is principally characterised by a sequence of planned residential streets and garden squares enclosed by terraced buildings laid out in a hierarchal fashion extending out of the main arterial routes. Bloomsbury has also continually adapted to accommodate different uses over time, and also includes a number of larger scale townscape elements primarily associated with major educational or cultural institutions such as the British Museum and University of London.
- 2.24 The conservation area has historical interest in illustrating the expansion, population growth and prosperity of this part of London from the 17th century, and also how its use and character has continued evolved up to the present day. It also has architectural interest in illustrating past approaches to planning, architectural design, style and use of materials across this period, which has resulted in a rich and diverse townscape of buildings and space with a distinctive sense of place.
- 2.25 It is our assessment that it is the principal street frontage along Tottenham Court Road that makes by far the greatest contribution to the character and appearance of the surrounding conservation area, relative to other (external) elements of this building on site. It is in this element that architectural quality and style was invested by its builder / designer; also reflecting the importance of this street and its commercial origins. It is within key views north and south along Tottenham Court Road that the historical and architectural relationship of this building within its urban block and the larger 19<sup>th</sup> century townscape scheme here can also be appreciated.

***Application Site***

- 2.26 As previously noted, the area of the Site that is proposed to be changed as part of this application scheme is located within the south-eastern corner of the ground floor level, facing Alfred Mews. This mews forms one of the secondary elevations of the Heals Complex, reflected in the more utilitarian style of the façade in this location. Furthermore, the existing condition is in a rather poor state, with the majority of what was, historically, an elegant open yard, now covered in poor quality metal roller shutters, that are unsympathetically fixed onto the stone lintel and brick piers (Figure 2.5).



**Figure 2.5: Alfred Mews service entry, historic façade (left), current façade (right)**

- 2.27 Overall these elements of the site building (i.e. secondary elevations); as part of street views, makes a far lesser contribution to the significance – character and appearance – of the conservation area, relative to its principal public street frontage to the west along Tottenham Court Road; and as a minor element within the context of this large and diverse conservation area as a whole.
- 2.28 Again, there are exceptions, however, to this assessment of the relative contribution of this part of the Heals ground floor area to the significance of the listed building as a whole. Along Torrington Place and wrapping around on to Tottenham Court Road the particular interest of the 1960s extension rests with its external appearance including its materiality, scale, and rhythmic pattern of projection and recession which provides an elegant counterfoil to the principal elevation along Tottenham Court Road. In addition, the art deco inspired elevation along Alfred Mews is also considered to contribute to the significance of the character and appearance of the conservation area, in demonstrating the growth of the Heals Building and the wider commercial success of this sub area (Figure 2.6).





**Figure 2.6:** Art Deco Façade to western end of Alfred Mews at junction with Tottenham Court Road

### 3. Application Scheme and Heritage Impacts

#### Application Scheme

##### Overview

- 3.1 The area of the Site that is proposed to be changed as part of this application scheme is located within the south-eastern corner of the ground floor level, facing Alfred Mews. This area is characterised as an industrial service area for the Heal's Complex which dates from the 19th century and was subsequently upgraded throughout the key phases of later development. The statement of heritage significance provides a more detailed description of the complex multi-phase development of this collection of building elements over time.
- 3.2 The initial scheme of works of refurbishment proposed for each of these areas within the Site are referred to as Phase 3i (Alfred Mews Reception) for the purposes of this application. These proposals are described in full through the design material prepared by the appointed architects Buckley Gray Yeoman (BGY), including proposed (annotated) drawings and their Design and Access Statement (DAS).
- 3.3 The DAS supports our own assessment of the heritage impacts of this scheme in describing how these carefully considered internal alterations will enliven this current back of house space into a modern accessible workplace entrance & associated amenity space for the growing commercial offer. As part of a sensitive and focussed design approach, this phase of enhancements will work with the enhance the existing building fabric, by removing damaging modern interventions & restoring the historic facade on Alfred Mews, and also take the opportunity to deliver a number of heritage benefits for the use and design of the listed building.

#### Impact Assessment

##### Phase 3i – Alfred Mews Reception (Ground Floor Level)

- 3.4 Our baseline appraisal of the significance of the listed building has established that as found today, these service/back of house areas that remain in use by Heals have a simple, utilitarian character internally, which has largely been determined by more recent refurbishment with modern materials, fixtures and fittings within the retained historic plan form and structure at this level. This is an area of lesser heritage significance within the context of the listed building as a whole, and therefore also less sensitive to further change, and where it has been subject to a greater degree of alteration in the past.
- 3.5 Nonetheless, there are a number of historic features within this area of the building which are considered to contribute to the significance of the Heal's Complex overall. These include industrial details such as a steel gantry crane, historic timber sliding doors, and cast iron columns (Figure 2.3). These remaining historic features contribute to the special interest of the listed building where they demonstrate the inter-relationship between manufacture and design, which was central to Heals.

3.6 The application DAS and drawings prepared by the architects describe in illustrated detail the proposed works in terms of the retention, removal and or replacement of internal elements within this area of the Heals demise. The proposed refurbishment and new fit-out will remove existing partitions, and fittings installed in the more recent period, and then redecorate to create more attractive and appealing front of house facilities to respond to the proposed expansion of commercially let office space within the building for Heals. The removal of the existing modern partitions will restore a more historic plan form to this area and is thus considered to be a potential heritage benefit. The internal finishes and design of the interventions have also been inspired by the existing historic fabric of the building with materials that are consistent yet contemporary. As such the palette of interventions is simple and consistent, with bronze metal for fenestration, balustrades and lighting with timber for furnishings & feature elements (Figure 3.1).



**Figure 3.1: Rendered view of proposed internal reception area with materials highlighted**

3.7 Following Pre Application Meeting 1 and the site visit with Historic England a number of significant Heritage features were identified that relate to previous uses of the building. The proposals are mindful to retain and celebrate these features where possible including:

- Steel Gantry Crane - Look to retain as part of the internal fit out of the space, giving note to the historic function of the space as a loading bay.
- Ownership Boundary - Markers On site there are a number of markers set into the structure of the historic fabric, delineating the freehold owners of the land and buildings that make up the Heal's Site.



- Existing Loading + Fire Doors - These steel & timber doors are highly expressive of the character and historic use of the spaces, and will become a prominent feature along routes through the building.
- Cast Iron Columns - The principle structure amongst a lot of the back of house spaces are historic Cast iron Columns, with details that speak to the inherent casting process, of limited welds and bolts & curving capitals. These will be maintained and expressed where possible.
- Brick Details - There are various brick details that are found in this area of the building, from the prominent brick piers of the facade, the brick upstands to the loading bay deck, and the glazed brick pavers that bring light down into the basement. We seek to expose and restore these in the proposals.

- 3.8 The retention and refurbishment of the above items, which contribute greatly to the special interest of the listed building where they demonstrate the inter-relationship between manufacture and design, is considered be a heritage benefit, which would better reveal the significance of the listed building and a key element of its early design and use.
- 3.9 The proposed scheme also includes the demolition and removal of some secondary elements including the raised floor and steps in loading bay 1 while the main existing structure will remain, in order to improve access through the new reception space. These works are to fabric that is of a modern date and as such of no particular heritage interest, as a result of the substantial modern reconfiguration and alteration of this element of the plan. This is a change that would sustain the significance of the listed building.
- 3.10 Importantly, the application Site and scheme also includes the redevelopment of the Alfred Mews Façade in this location. The existing condition is in a rather poor state, with the majority of what was, historically, an elegant open yard, now covered in poor quality metal roller shutters, that are unsympathetically face fixed onto the stone lintel and brick piers.
- 3.11 The refurbishment of the Alfred Mews elevation will feature greater activation at ground level, where the sense of welcome / arrival and overall legibility of the entrance to the building would be improved within the streetscene. The design of the new entrance to the building in this location has been carefully considered and inspired by the history and existing architectural forms of the host building.
- 3.12 The approach is straightforward, remove the existing unsympathetic metal roller shutters and reveal the original/historic fabric. The stone lintel above is proposed to be renovated, with new signage to match the historic typography. The new Alfred Mews façade will thus feature a series of new bronze coloured metal framed windows and doors that take inspiration from the art deco stair design of the Heal's building and the heritage glazing on the rest of the façade (Figure 3.2). As a result, this alteration will respect the character of the host building. The combination of the bronze frame and glazed entry doors will also further animate and add interest in local views. It is considered that these works will overall sit comfortably within the existing built form to the front of Alfred Mews, create a more active frontage, and will restore the façade

to a more historic design. Therefore, the works are considered to enhance the character and appearance of the conservation area.



**Figure 3.2: Rendered View of the proposed entrance along Alfred Mews**

- 3.13 In addition to the facade, the proposed scheme also includes the removal existing fire exit door from the stair which features a design that is at odds with the host building and is not original. This door will be upgraded with a solid bronze clad metal door in the same fenestration format as the rest of the facade to create a consistency across the facade. It is considered that this minor alteration will, overall, sit comfortably within the existing built form to the Alfred Mews elevation. Therefore, the works will be an improvement over the existing and create a more active frontage which will enhance the character and appearance of the conservation area.
- 3.14 Overall, these external elements of the proposals represent high quality design and would respect the character of the Heal's building, also where the side elevation is of lesser significance relative to the public street frontage. The proposals are an improvement over the existing and, therefore, would sustain and enhance the prevailing character and appearance of the conservation area.
- 3.15 The DAS and drawings describe the proposed works for the light touch refurbishment of this service space to the rear of the building complex. The proposed refurbishment and new fit-out will remove existing partitions, and fittings installed in the more recent period, and then redecorate to create more attractive and appealing front of house facilities to respond to the proposed expansion of commercially let office space within the building for Heals. Although the physical changes proposed internally would not affect heritage significance, the proposed reuse and revitalisation and return to a more historic plan form of this service area would be a potential heritage benefit. The reactivation of the Alfred Mews facade, and reconfiguration of the service area, would

thus better reveal the significance of the listed building and also its contribution to the surrounding conservation area.

- 3.16 It is to be noted that this scheme (Phase 3i) forms the next immediate phase of the Applicant's proposals, and as part of a wider and more ambitious vision for the future use and revitalisation of the Site focussed around the Heals store. Agreement has already been secured with the local planning authority to undertake a light-touch refurbishment and soft strip out of the currently vacant office accommodation across the upper floors (levels 3-5) of the larger building, and an application for listed building consent for the refresh of modern reception spaces to Torrington Place and Alfred Mews is also now pending consideration by the LBC. This next stage of a broader fit-out is seen as a critical part of enabling the building to become fully occupied during 2022, including accommodating Heals aspirations to remain on site and optimise its use, whilst the wider strategic vision for the building is being further developed.
- 3.17 On the basis of our appraisal of the particular significance of the listed building and its various areas and elements with the Site, it is our assessment that these refurbishment works would not in any way harm, or otherwise adversely affect that heritage significance. These are relatively minor works would only effect modern fabric or features, and would not alter the form, character and or appearance of areas of the Heals store to any degree that would affect or detract from the listed building's special interest.
- 3.18 Additionally, as stated above, the proposed reuse and revitalisation and return to a more historic plan form of this service area offers a number of potential heritage benefit. These include:
- The removal of the existing modern partitions will restore a more historic plan form to this area
  - The retention and refurbishment of the existing historic features, which contribute greatly to the special interest of the listed building where they demonstrate the inter-relationship between manufacture and design
  - The proposed façade works which will overall sit comfortably within the existing built form to the front of Alfred Mews, create a more active frontage, and will restore the façade to a more historic design
- 3.19 The other proposed works to reactivate the Alfred Mews facade, and reconfiguration of the service area, would thus better reveal the significance of the listed building and also its contribution to the surrounding conservation area.

### **Compliance with relevant Legislation and Planning Policy**

#### ***Statutory Duty - The Planning (Listed Buildings and Conservation Areas) Act 1990***

- 3.20 It is demonstrated within this section of the report that the application proposals would accord with the requirements of the relevant statutory duties of the 1990 Act. This scheme would preserve the special interest (and setting) of the listed building on Site. This scheme would also preserve, or to a degree enhance, the character and appearance of the surrounding conservation area.

### ***National Policy - NPPF 2021 and NPPG***

- 3.21 In accordance with the requirements of paragraphs 194-195 of the NPPF, the significance of the identified relevant designated heritage asset has been described proportionately in **Section 2 and Appendix 1** (i.e. our Heritage Baseline Appraisal) of this report. This provides an appropriate analysis of the baseline conditions of the Site in relation to built heritage matters.
- 3.22 In accordance with Paragraph 197 of the NPPF, account has been taken of the desirability of sustaining and enhancing the significance of the affected heritage asset and maintaining this commercial building in 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 scheme is considered to achieve this by enhancing an appreciation and understanding of the listed building through well-considered refurbishment works, and also the associated optimising of the viable commercial use and vitality of the wider complex for the iconic Heals brand.
- 3.23 In accordance with Paragraph 199, great weight has been given to the assets' conservation. Importantly, Annex 2 of the NPPF defines 'conservation' as the process of maintaining and managing 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 scheme will have been designed to a high standard, respect heritage significance, and would avoid harm. It is our overall assessment that the designated heritage asset would be conserved and its significance sustained, and also enhanced, as a result of these works.
- 3.24 The proposals are also in accordance with paragraph 206, which encourages local planning authorities to look for opportunities for new development within conservation areas and also the setting of heritage assets, such as listed buildings, to enhance or better reveal the significance. These opportunities are summarised in the list of heritage benefits outlined above.

### ***Development Plan***

#### ***London Plan 2021***

- 3.25 The proposed scheme would accord with policy HC1 of the London Plan, which requires development affecting heritage assets to conserve their significance, by being sympathetic to that significance and also their settings. This is again in accordance with overarching national legislation and planning policy with regard to built heritage assets (as set out earlier in this section above).

#### ***Camden Local Plan 2017***

- 3.26 In accordance with Policy D2 (Heritage), these proposals will conserve the designated heritage asset of the listed building on Site, and sustain, or to a degree enhance, its significance. Any harm to heritage significance would be avoided. This scheme would also preserve or enhance the character and appearance of the surrounding conservation area.

## Summary and Conclusions

- 3.27 In summary, the relevant built heritage considerations in the determination of this application for refurbishment works are potential direct impacts on the significance of the designated heritage assets of the listed building Heals Building (Grade II\*) as well as the surrounding Bloomsbury Conservation Area.
- 3.28 A proportionate description of the baseline conditions in relation to this identified heritage asset has been undertaken, including a description of its heritage significance and also any contribution made by the area of proposed change within the Site to that significance. This work has been undertaken in accordance with best practice guidance and advice as established by DCMS and Historic England, and meets the requirements of paragraphs 194-195 of the NPPF.
- 3.29 It is our further assessment that that the proposed scheme of works (Phase 3i) for this part of the Heals demise, would overall conserve this designated heritage asset, and also sustain or enhance its significance. This further roll out of the Applicant's envisioned high quality refurbishment would help to optimise the viable commercial use, vitality and appearance of this historic complex.
- 3.30 In particular, the proposed reuse and revitalisation and return to a more historic plan form of this service area offers a number of potential heritage benefit. These include:
- The removal of the existing modern partitions will restore a more historic plan form to this area
  - The retention and refurbishment of the existing historic features, which contribute greatly to the special interest of the listed building where they demonstrate the inter-relationship between manufacture and design
  - The proposed façade works which will overall sit comfortably within the existing built form to the front of Alfred Mews, create a more active frontage, and will restore the façade to a more historic design
- 3.31 Overall, the proposed works to reactivate the Alfred Mews facade, and the reconfiguration of the service area, would thus better reveal the significance of the listed building and also its contribution to the surrounding conservation area.

## **Appendix 1: Baseline Heritage Appraisal, December 2021**

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