

Heritage Statement

Phase 3A – Heal's Entrance

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 Heal's Entrance along the Tottenham Court Road elevation. This work forms part of an application to rationalise the main entrance to help unite the retail spaces behind at 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 3A (Heal's Entrance - Tottenham Court Road).
- 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 this carefully considered external alteration will rationalise the main entrance to help unite the retail spaces behind at the Heal's Building. As part of a sensitive and focussed design approach, this intervention will enhance the existing building fabric by removing modern interventions to the main entrance and replacing them with newer more sympathetic additions.

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 3A (Heal's Entrance - Tottenham Court Road) (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 ...'*¹
- 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

¹ 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 3A (Heal's Entrance - Tottenham Court Road)) 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 3A) to rationalise the main entrance to help unite the retail spaces behind at 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)”.*²

Designated Heritage Assets

- 2.2 Designated heritage assets are those which possess a level of heritage interest that justifies designation under relevant legislation and are then subject to particular procedures in planning decisions 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.”*³

- 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.⁴

² MHCLG, National Planning Policy Framework (NPPF) 2021 – Annex 2: Glossary

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

⁴ 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 environment⁵. 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 Sport⁶ and supported by Historic England's Listing Selection Guides for each building type⁷.

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.⁸

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

⁵ English Heritage (now Historic England) Conservation Principles: Policies and Guidance 2008

⁶ DCMS. Principles of Selection for Designating Buildings, 2018

⁷ Historic England. Selection Guides 2011 (and updated)

⁸ 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 20th century and inter-war phases. Of particular interest internally are the part original spiral staircase deeper within the plan of the early 20th 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 19th 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 the main entrance to the 1960's extension by Fitzroy Robinson, located along Tottenham Court Road. As previously described, the principal façade of the building, and consequently the main entrance, has changed a number of times since the original façade was constructed in the mid-19th century by J. Morant Lockyer. The earliest example is evident in the design for the 1930's extension by Edward Maufe, which demonstrates that the entrance was located to the south of the current entrance providing direct access to the Heal's Showrooms at ground floor level (Figure 2.1)

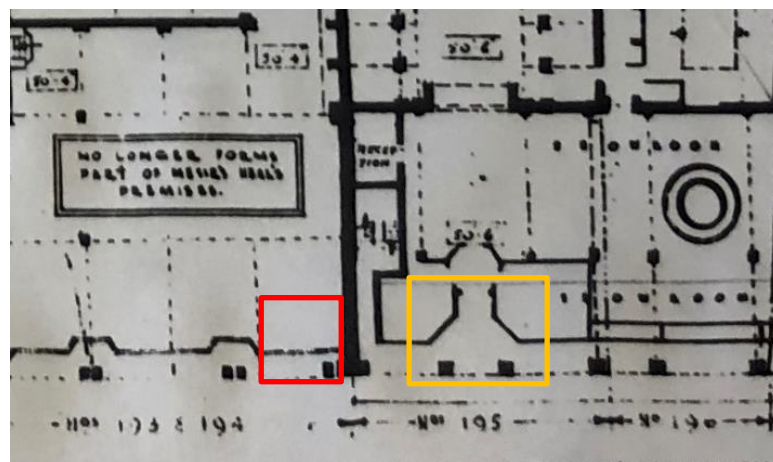


Figure 2.1: Extract of 1937 Ground Floor Plan (existing entrance highlighted in orange and current entrance in red)

- 2.17 Most recently, both Heals and Habitat stores were entered through a single bay main entrance of the 1960's building at ground-floor level to Tottenham Court Road, which represents a later 20th century adaptation of no heritage interest. Externally, and to both Tottenham Court Road and Torrington Place street elevations, the former 1960's store has a distinctive curving non-reflective glass shop front. The particular interest of the 1960's addition to the wider Heal's Complex thus rests with its external appearance including its materiality, scale, and rhythmic pattern of projection and recession which provides an elegant counterfoil to the principal 1916 elevation along Tottenham Court Road.
- 2.18 Figure 2.2 is an extract from a drawing plan of the Heals Building dating from 1963, which indicates an early proposal for the 1960s store extension to the north by Fitzroy Robinson at ground floor level. This drawing demonstrates that the entrance location to the building remains in the same position as currently found, however it appears that the entrance has been made narrower and the entry doors have been removed (Figure 2.3).

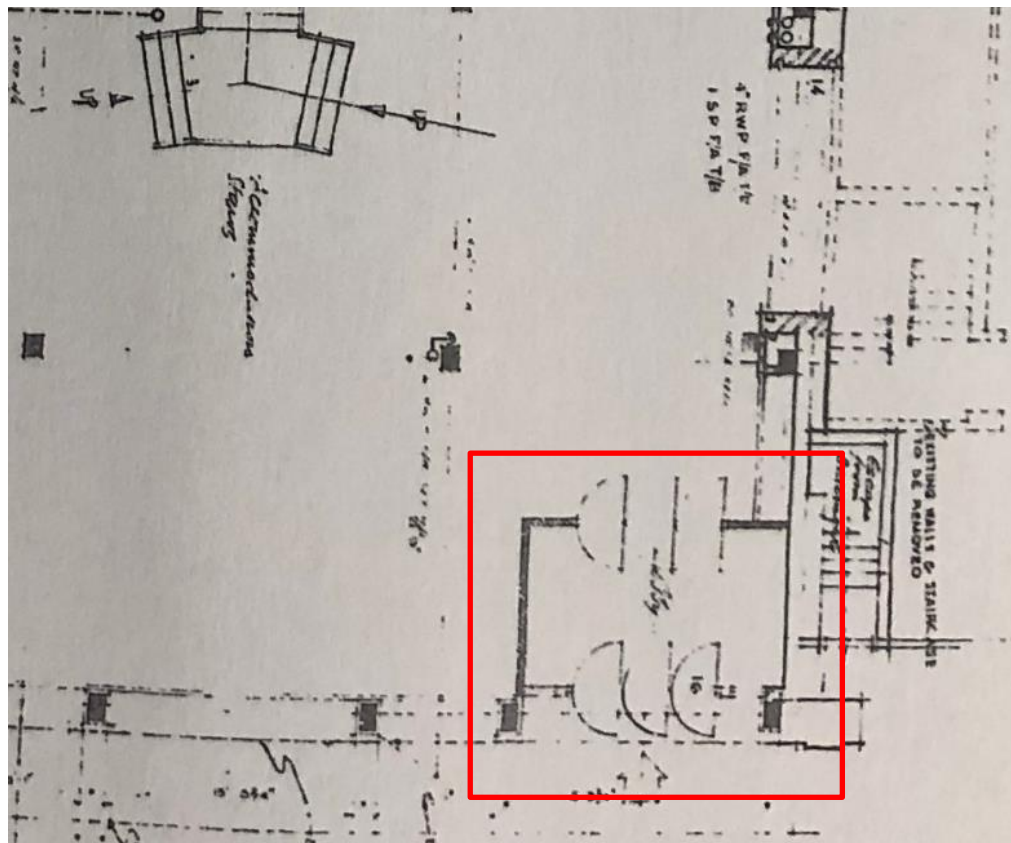


Figure 2.2: Extract of 1963 Proposed Ground Floor Plan (building entrance outlined in red)



Figure 2.3: Existing Entrance to Heal's Building 2022

- 2.19 Importantly, a historic photo from 1984 demonstrates that the existing main entrance to the Heal's building did not yet feature a canopy which is extant today (Figures 2.4 and 2.5). As a result, while the current entrance forms part of the 1960's façade to Tottenham Court Road, it is evident that it has been heavily altered in the recent past with the addition of a modern canopy which is of no particular heritage interest. Based on the drawings and historic photography below, it is thus assumed that the original entrance to the building in this location would have been more austere with no canopy and a set of glazed entrance doors. The existing main entrance is thus considered to be an area of lesser heritage significance within the context of the listed building as a whole, and therefore also less sensitive to further change, where it has been subject to a greater degree of alteration in the past.
- 2.20 Furthermore, as found today the existing entrance consists of primarily modern materials including a projecting PPC metal square canopy with drainage directed to the inside, a dropped PPC metal bulkhead which houses a roller shutter, and a facade is Portland stone with a marble flooring that is cracked in certain places (Figure 2.5)



Figure 2.4: Heal's Building Façade, 1984. Image provided by London Metropolitan Archives (building entrance outlined in red)

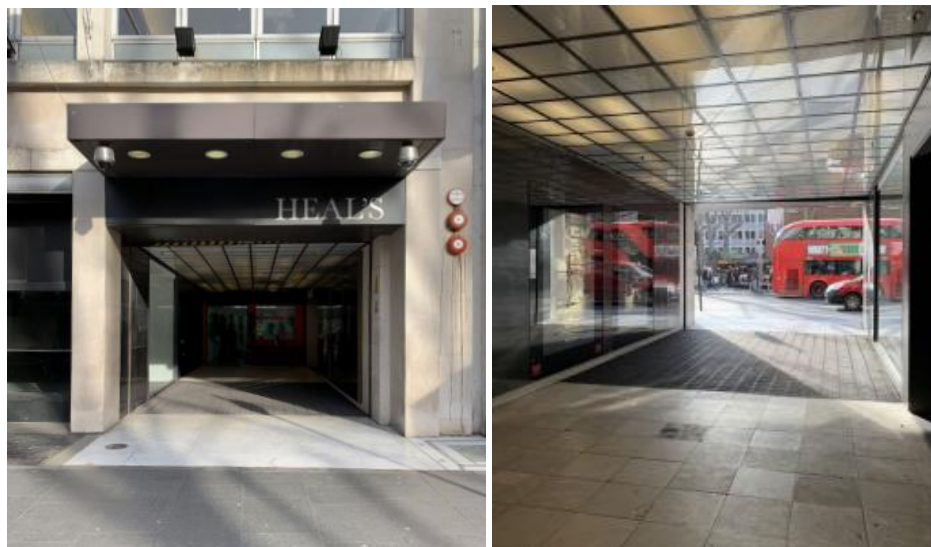


Figure 2.5: Existing entrance to Heal's Building from Tottenham Court Road (left) and looking back towards Tottenham Court Road (Right)

2.21 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 2.6) 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 2.6: 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 19th 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 the main entrance to the 1960's extension by Fitzroy Robinson, located along Tottenham Court Road. Externally it is considered that the distinctive form of Tottenham Court Road elevation from 1916, designed by Smith & Brewer, is the chief expression of heritage interest, and here later alterations appear to be limited. The respectful and contextual addition in the 1960's to the north is also a key feature to this elevation. However, as noted above the existing main entrance which forms part of the later sympathetic 1960's extension has been heavily altered over the years and features a modern canopy. Overall this minor element of the Heal's complex, as part of the wider view of the principal elevation along Tottenham Court Road, makes a far lesser contribution to the significance – character and appearance – of the conservation area, relative to the 1916 façade, which has been little altered, or the 1960's facade; and as a small element within the context of this large and diverse conservation area as a whole (Figure 2.7).



Figure 2.7: Existing entrance to Heal's Building with modern canopy and metal roller shutter

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 the main entrance to the 1960's extension by Fitzroy Robinson, located along Tottenham Court Road. This area is characterised as respectful and contextual addition in the 1960's to the north of the principal 1916 facade and the entrance itself has subsequently be altered and relocated throughout the key phases of 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 This work forms part of an application for works to rationalise the main entrance to help unite the retail spaces behind at 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 3A (Heal's Entrance - Tottenham Court Road). 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 this carefully considered external alteration will rationalise the main entrance to help unite the retail spaces behind at the Heal's Building. As part of a sensitive and focussed design approach, this intervention will enhance the existing building fabric, by removing modern interventions to the main entrance and replacing them with newer more sympathetic additions.

Impact Assessment

Phase 3A – Heal's Main Entrance, Tottenham Court Road

- 3.4 Our baseline appraisal of the significance of the listed building has established that, while the current entrance forms part of the 1960's façade to Tottenham Court Road, it is evident that it has been heavily altered in the recent past with the addition of a modern canopy and entrance which is of no particular heritage interest. The existing main entrance is thus considered to be an area of lesser heritage significance within the context of the listed building as a whole, and therefore also less sensitive to further change, where it has been subject to a greater degree of alteration in the past.
- 3.5 Nonetheless, the principal façade as a whole is considered to contribute to the significance of the Heal's Complex overall. As to both Tottenham Court Road and Torrington Place street elevations, the former 1960s store has a distinctive curving non-reflective glass shop front. The particular interest of the 1960's addition to the wider Heal's Complex thus rests with its external appearance including its materiality, scale, and rhythmic pattern of projection and recession which provides an elegant counterfoil to the principal 1916 elevation along Tottenham Court Road.

- 3.6 The application DAS and drawings prepared by the architects describe in illustrated detail the proposed works and design development which has been carried out in order to ensure that the design of the new entrance will enhance the existing building fabric, by removing modern interventions to the main entrance and replacing them with newer more sympathetic additions. Furthermore, the design of the new entrance to the building has been carefully considered and inspired by the history and existing architectural forms of the host building.
- 3.7 The approach is to create a recessed entrance façade of glass and Portland stone which will be centred on a set of tall wing doors with fixed glazing to either side. In addition, the entrance doors will be bordered by minimal Portland stone pilasters, with the frames of the doors creating a bronze effect, referencing the historic metal work found throughout the wider Heal's Complex (Figure 3.1). 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.
- 3.8 The proposed scheme also includes the demolition and removal of some secondary elements including the modern entrance canopy and metal bulkhead. It is expected that the Portland stone facade is intact behind the canopy, and if not, it is to be repaired and reinstated. 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 to the entrance. It is also necessary to remove the existing marble entrance paving which has become worn and cracked over time. This is a change that would sustain the significance of the listed building.
- 3.9 It is considered that these works will overall sit comfortably within the existing built form Along Tottenham Court Road and the recessed entrance will ensure that the new entrance does not compete with the wider façade where the significance and special interest is best appreciated. This new proposal will also will restore the façade to a more historic design, echoing the original 1960's entrance. In this way, the works are considered to enhance the character and appearance of the conservation area.



Figure 3.1: Rendered View of the proposed entrance along Tottenham Court Road

- 3.10 Restoration works are also proposed to the façade of the 1960's structure, where the façade will be cleaned to remove the previous Habitat signage which are still visible and need to be cleaned away. Following the restorative cleaning works to the Portland stone, new "Heal's" signage is to be fitted in their place on Torrington Place and Tottenham Court Road, as described on the adjacent elevation drawings. For visual consistency, the new signage is to replicate the existing Heal's signage that already exists elsewhere on the facades. This is considered to be a minor heritage benefit.
- 3.11 Overall, the proposed changes to the main entrance represent high quality design and would respect the character of the Heal's building. The proposals are an improvement over the existing and, therefore, would sustain and enhance the significance of the listed building and the prevailing character and appearance of the surrounding conservation area.
- 3.12 It is to be noted that this scheme (Phase 3A) 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 Heal's 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.

Overview of Scheme

- 3.13 On the basis of our appraisal of the particular significance of the listed building, it is our assessment that the proposed works would not in any way harm, or otherwise adversely affect that heritage significance. These are relatively minor works and would only effect modern fabric or features, and would not alter the form, character and or appearance of the Heals complex to any degree that would affect or detract from the listed building's special interest.
- 3.14 Additionally, the proposals to rationalise the main entrance to help unite the retail spaces behind at the Heal's Building offers a number of potential heritage benefits. These include:
- Repair / restoration works to the main body of the host building – cleansing of existing Portland Stone
 - The proposed main entrance works which will overall sit comfortably within the existing principal façade as the recessed entrance will ensure that it does not compete with the wider façade where the significance and special interest is best appreciated; and will restore the façade to a more historic design

Compliance with relevant Legislation and Planning Policy

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

- 3.15 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

- 3.16 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.
- 3.17 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.
- 3.18 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. As no harm will be caused by these proposals, the tests in paragraphs 200-202 would not be engaged.
- 3.19 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

- 3.20 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

- 3.21 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

- 3.22 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.
- 3.23 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.
- 3.24 It is our further assessment that that the proposed scheme of works (Phase 3A) 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.
- 3.25 In particular, the proposals to rationalise the main entrance to help unite the retail spaces behind at the Heal's Building offers a number of potential heritage benefits. These include:
- Repair / restoration works to the main body of the host building – cleansing of existing Portland Stone
 - The proposed main entrance works which will overall sit comfortably within the existing principal façade as the recessed entrance will ensure that it does not compete with the wider façade where the significance and special interest is best appreciated; and will restore the façade to a more historic design
- 3.26 Overall, the proposed works to main entrance along Tottenham Court Road 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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