

13 June 2022

**Delivered via Planning Portal (PP-11232276)**

Development Management  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9JE

Ref: GENH3002

Dear Sir/Madam,

**HEAL'S BUILDING, 196 TOTTENHAM COURT ROAD, LONDON, W1T 7LQ**  
**APPLICATION FOR PLANNING PERMISSION AND LISTED BUILDING CONSENT**

We write on behalf of our client, General Projects ('the Applicant') to submit an application for full planning permission and Listed Building Consent (LBC) to London Borough of Camden ('LB Camden') in its role as Local Planning Authority ('LPA') for the proposed external alteration and refurbishment works to the internal courtyard elevation and associated internal refurbishment works of the Heal's Building at 196 Tottenham Court Road, London, W1T 7LQ ('the site').

**Submission**

The application was submitted via the Planning Portal under reference PP-11232276. The submission comprises the following:

- Planning Application Fee (£500.20) paid electronically via the Planning Portal.
- Application Form;
- Cover Letter (this document);
- Site Location Plan, prepared by Buckley Gray Yeoman (BGY);
- A suite of existing, demolition and proposed drawings and plans, prepared by BGY (See Drawing Register for a detailed list);
  - Site Location Plan/ Block Plan
  - Existing Plans
  - Demolition Plans
  - Proposed Plans

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- Existing Courtyard Elevation
  - Demolition Courtyard
  - Proposed Courtyard
  - Existing Sections
  - Demolition Sections
  - Proposed Sections
  - Existing Alfred Mews Stair
  - Existing Basement Access Stair
  - Existing Heal's Stair
  - Proposed Alfred Mews Stair
  - Proposed Basement Access Stair
  - Proposed Post Production Stair
  - Proposed Heal's Stair Infill
- Design and Access Statement (DAS), prepared by BGY;
  - Heritage Statement prepared by Turley; and
  - Fire Strategy prepared by Design Fire Consultants.

## SITE BACKGROUND AND DESCRIPTION

The site and larger building complex that covers the greater part of the urban block defined by Tottenham Court Road (A400), Torrington Place and Alfred Mews, and which also includes the historic premises of Heal and Son Limited, was first included on the statutory list of buildings of special architectural and historic interest at Grade II\* on 14 May 1974. The building currently incorporates a range of retail uses at lower, ground and first floor including Heal's department store and the currently vacant Habitat demise which provides the site's primary frontage onto Tottenham Court Road. The upper levels of the main department store and complex of buildings to the rear are principally in office or 'back of house'/ancillary uses. The site operates under Use Class E with the exception of the existing residential flats within the site (Class C3), which are excluded from the proposals.

The site is also located within designated area of the Bloomsbury Conservation Area, and within the shared setting of a number of Listed Buildings along Tottenham Court Road (to the south) and within surrounding streets.

More generally, the site is located within the Tottenham Court area of the West End (an identified growth area under Camden's Local Plan) and the Central Activities Zone (CAZ) (as per the London Plan (2021)). The surrounding area is reflective of the site's CAZ location with the neighbouring buildings being in use for a mix of principally retail and commercial (Class E) uses alongside residential uses (Class C3) towards Bloomsbury to the east.

The proposed development forms an important element of the Applicant's wider vision to sensitively reinvigorate the use and appearance of the historic Heal's Building. This will be achieved through a phased approach to design, procurement, and delivery of the wider scheme for the Heal's Building to ensure the current vacant spaces are fully occupied and to meet the wider strategic vision for the building.

The table below summarises the current applications that have been submitted as a part of the wider Heal's Building scheme to date. To note, the stage of works that is the subject of this current application is referred to as Phase 3(ii) (Ground Floor and Basement Commercial Units and Courtyard Elevations) and is described further below.

**Table 1: Site Application History**

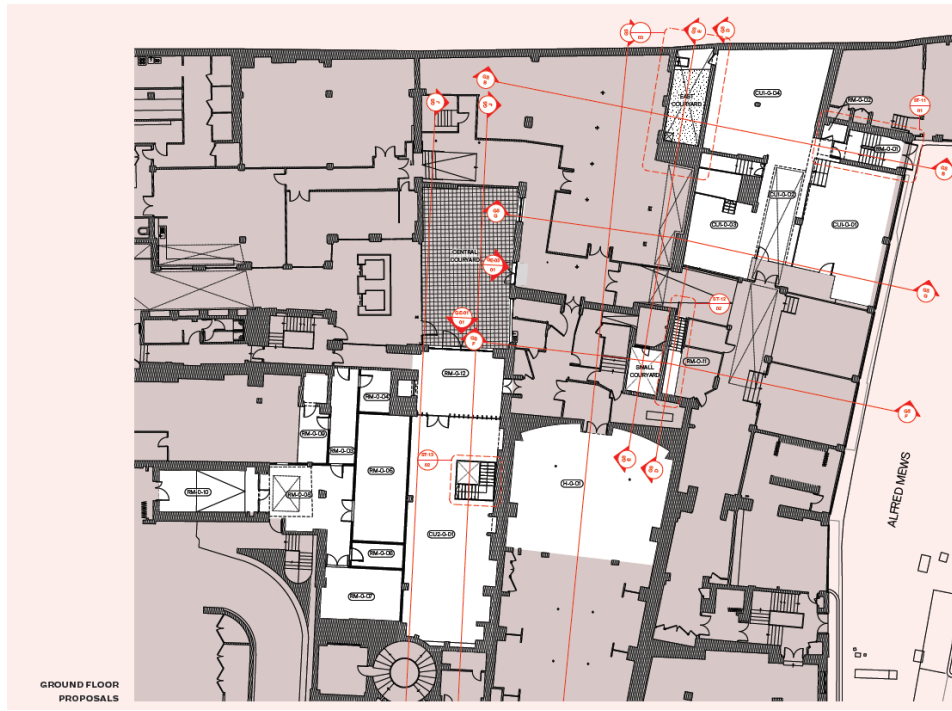
Phase	Application Reference	Description	Status	Target Decision Date
Phase 1A (Torrington Place and Alfred Mews Reception)	2022/1380/L	Internal refurbishment and alterations to existing reception areas, fronting onto Torrington Place and Alfred Mews.	Validated – 13 April 2022	Mid May (Consultation expired on 04 May 2022) Expected 8 June
Phase 2 (Heal's Demise)	2022/1961/L	Internal refurbishment and alterations to the basement and ground floor level of Heal's and former Habitat spaces including re-opening entrance onto internal courtyard.	Validated – 10 May 2022	Mid-June (Consultation Expired 30 May 2022) Expected 5 July
Phase 3(i) (Alfred Mews Reception)	2022/2084/P (Full Planning) (and 2022/2089/L (Listed Building Consent))	Refurbishment and external alterations to the Alfred Mews façade of the Heal's Building, including removal and replacement of roller shutters, installation of fenestration, new entrance doors, retractable awnings and associated internal refurbishment works.	Validated - 16 May 2022	Expected 11 July
Phase 3A (Heal's Entrance)	2022/2462/P (Full Planning) and 2022/2465/L (Listed Building Consent)	Refurbishment and external alterations to ground floor Tottenham Court Road and Torrington Place façades of the Heal's Building, including works to Heal's entrance comprising: removal of existing metal canopy, refurbishment of Portland stone façade, and installation of new glazed doors.	Validated – 08 June 2022	Expected 3 August

## PROPOSALS – PHASE 3(II) (GROUND FLOOR AND BASEMENT COMMERCIAL UNITS & COURTYARD ELEVATIONS)

The proposals subject of this application for full planning permission and Listed Building Consent seek to deliver external alteration and refurbishment works to the internal courtyard elevation and associated internal refurbishment of commercial spaces- at basement level within the north eastern corner of Heal's Building (see Figure 1 below).

More specifically, the proposals seek full planning permission and Listed Building Consent for the following development:

*“Refurbishment and external alteration works to the internal courtyard elevation, including opening up of existing openings to original forms, repairs to existing structures, installation of a metal framed glazed fenestration and grilles to existing openings in small inner courtyard and other associated internal works.”*



**Figure 1:** Extent (denoted in white) of Proposed Ground Floor Plan covered by Phase 3(ii), prepared by BGY

## External Works and Alterations to Courtyard

The proposals seek to renovate the openings to the south west and south east elevations in the central courtyard. This involves the unblocking of a historic openings, the enlargement of the existing door, and reinstating the original larger opening to remove brick elements that border the doorway currently. New metal framed glazed windows and doors will be included (see figure 2), matching the styles of existing Crittal Style windows and those in the previous application relating to Alfred Mews (2022/2084/P I 2022/2089/L). Existing structures will be made good and repaired, and new grilles will be fitted in small Inner courtyard for ventilation and smoke purging in the basement.



**Figure 2: Proposed Courtyard south east Elevation covered in Phase 3(ii), prepared by BGY**

## Internal Works and Alterations

The main interventions internally involve the removal of secondary non-structural walls and false floors in loading bays, installation of new glazed partitions and installation of a new staircase between the basement and ground floors in the north eastern quarter of the building. The works will be supported by the installation of new, and upgrade of existing, staircases upgrading of fire escapes from the basement to the reception area and Alfred Mews, and creating new service space for back of house functions. The proposed works will enable the delivery of two high quality flexible commercial units.

Both elements of the proposals have been subject to pre-application engagement with LB Camden and Historic England, where Officers have confirmed in principle support for the works.

This Covering Letter should be read in conjunction with the supporting Design and Access Statement (DAS), together with the proposed plans and drawings, prepared by BGY, and all the other supporting documents.

## PLANNING POLICY AND ASSESSMENT

Legislative requirements for works to the Listed Building are set out in the submitted Heritage Statement, prepared by Turley.

The adopted Development Plan for the site comprises:

- The London Plan (2021);
- LB Camden's Local Plan (2017), and
- The Fitzrovia Area Action Plan (FAAP) (2014).

Other policy documents that are material to the consideration and determination of this full planning permission and LBC application include Camden Planning Guidance (CPG) (which have status as Supplementary Planning Documents), prepared by LB Camden. This includes the following (not an exhaustive list):

- Design CPG (2021)
- Employment Sites and Business Premises CPG (2021)
- Town Centres and Retail CPG (2021)

The Government's national planning policies for England are set out in the National Planning Policy Framework ('NPPF') (2021). Supporting the NPPF is the online national Planning Practice Guidance ('PPG' or 'NPPG') (2021), and the recently published National Design Guide (2019).

### **Principle of Refurbishment of Commercial Floorspace**

Local Plan Policy TC1 confirms the Council expects to focus the delivery of retail and commercial uses within, inter alia, the growth area of Tottenham Court Road. The proposals will refurbish and sensitively alter the currently underutilised spaces to accommodate forthcoming commercial units. Overall, the proposed delivery of refurbished high quality commercial units at the ground floor and basement level will contribute to the retail and commercial offer of the wider building and further enhance the functions of Tottenham Court Road Growth Area (and also the CAZ). On this basis, the proposals are considered to be supported in principle by Local Plan Policy TC1.

### **Principle of Minor Alterations to a Listed Building**

The Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special regard to be paid to the desirability of preserving the special architectural or historic interest of a Listed Building or its setting.

The National Planning Policy Framework (NPPF) contains guidance in relation to development proposals affecting heritage assets and conservation of the historic environment. In particular, paragraphs 194-195 set 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.

In addition, London Plan Policies HC1 and HC2 require development affecting heritage assets to conserve their significance, by being sympathetic to that significance and also their settings, and subsequently enhance heritage assets and architectural features that contribute towards local character.

At the local level, Local Plan Policy D1 confirms the Council will seek to secure high quality design in development and requires that development, inter alia: respects local context and character; and preserves or enhances the historic environment and heritage assets. Local Plan Policy D2 further notes that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and Listed Buildings. The Policy confirms 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.

The proposals are supported by the submitted Heritage Statement, prepared by Turley. Based on the heritage impact assessment, the Statement concludes the proposed refurbishment works to the ground and basement level commercial units and courtyard would conserve this designated heritage asset, and also both sustain and enhance its significance, in accordance with Paragraphs 194-195 of the NPPF, Policy HC1 of the London Plan and Policy D2 of the Local Plan.

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, and enhancement for both the Listed Building and the wider Bloomsbury Conservation Area.

## Design

London Plan Policy D3 (A) confirms all development must make best use of land by following a design-led approach that optimises capacity of sites. London Plan Policies D3 (D) further notes proposals are expected to respond to local context through their layout, orientation, scale, appearance, and shape, with buildings of a high standard of sustainable design and architecture whilst providing active frontages and achieving safe, inclusive environments (in line with London Plan Policy D5).

Similarly, Local Plan Policy D1 states development should secure high quality design which respects and complements the local context and character, is sustainable in design and construction, and contributes positively to the street frontage.

At the core of the design approach taken by the proposals is the aim to deliver sensitive, high quality refurbishment works to bring this part of the building up to the latest market standards. The refurbishment and restoration works focus on removing the non-original modern additions, whilst critically also celebrating the site's key heritage features and carefully restoring the historic fabric of the building.

As mentioned the proposals seek to provide a series of external and internal alterations that are sensitive to the context of the building. This includes the installation of new and upgraded windows and doors to the internal courtyard improving the visual appearance, quality, and amenity of this space. This is alongside, the reinstating of historic openings, and a new access staircase that helps provide linkages between the spaces, alongside high quality refurbished commercial floorspace.

It is therefore considered the proposals will comprise a high standard of design and architecture which will sensitively improve the visual appearance of the internal courtyard and deliver two high quality modern commercial units for the future occupiers, in accordance with London Plan Policy D3 and Local Plan Policy D1.

## Sustainability

The proposals seek to provide the highest standards of sustainable design and construction feasible in accordance with London Plan SI2, SI3 and SI4 and Local Plan Policy CC1 and CC2, through limiting the scale of interventions to the minimum and removing mainly secondary elements only to repurpose the historic building.

Specifically, it is proposed to provide new fenestrations to the courtyard, which will improve the thermal performance along the façade, alongside the applicant's wider overarching strategy for refurbishing and adapting this important existing historic building. The proposals are thus considered to accord with key aspirations of the London Plan Policies SI2, SI3, SI4 and Local Plan Policies CC1 and CC2.

## SUMMARY

The Applicant's proposals seek to deliver sensitive refurbishments through external works (alterations to the courtyard elevation) and internal works to deliver two high quality refurbished commercial units. Overall, the

proposals would constitute high-quality small-scale enhancements to the usability and quality of the existing areas, sustaining the significance of the Heritage Asset and positivity contributing to the continued function of the Tottenham Court Road Growth Area and the wider CAZ. Therefore, the proposals are considered to be fully accord with the requirements of NPPF, London Plan Policies and Local Plan Policies.

We trust this information is sufficient to validate this full planning permission and Listed Building Consent application. However, please do not hesitate to contact myself or my colleagues Richard Brookes ([Richard.Brookes@turley.co.uk](mailto:Richard.Brookes@turley.co.uk)), Oliver Jefferson ([Oliver.Jefferson@turley.co.uk](mailto:Oliver.Jefferson@turley.co.uk)) or Kinari Tsuchida ([Kinari.Tsuchida@turley.co.uk](mailto:Kinari.Tsuchida@turley.co.uk)) -if you have any queries.

Yours sincerely



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