

Heritage Statement

Phase 2 – 1930s Basement Stair Enclosure

Heals Building, 196 Tottenham Court Road,
W1T 7LQ

June 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 minor works of refurbishment to an area of the existing basement level at the Heals Building. This internal refurbishment is required in order to upgrade the existing access to the basement retail area within this part of the building within the demise of Heals. Importantly, these early stage 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 store. This new application is thus effectively a minor revision to the wider Phase 2 works at basement level and is referred to as (1930s Basement Stair Enclosure).
- 1.3 This report should be read in conjunction with the application submission design material for this scheme, as prepared by the architects White Red Architects (WRA), 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 alterations will improve the existing access to the basement area of the Heals store. As part of a sensitive and focussed design approach, these early stage enhancements will work with the existing historic building fabric and features, remove modern additions internally, and also take the opportunity to reinstate the historic 1936 layout at basement level, which is considered to be a heritage benefit 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 indicated that these Phase 2 (1930s Basement Stair Enclosure) works be subject an application for consent. They have also raised no objection to, but have offered support for, the principle of these proposals (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 then establishes a description of the built heritage baseline conditions for the Site and these proposals. For this first application, this is a statement of heritage significance for the identified listed building on Site, 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 2 (1930s Basement Stair Enclosure)) 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 2 (1930s Basement Stair Enclosure)) for the reinstatement of the 1936 layout at the basement level within this larger listed building complex would conserve this designated heritage asset, and also both sustain and enhance its 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.
- 2.4 It common ground with the local planning authority that these relatively minor proposals on Site would not affect the significance of any other statutory listed buildings within the surrounding area through change to their settings and or views. Nor would these proposals affect the significance – character or appearance – of the Bloomsbury Conservation Area (also a designated heritage asset) that also covers the area of the Site, as a result of the internalised nature of these works.

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.

Statement of Heritage Significance

- 2.9 **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.
- 2.10 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*)

- 2.11 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 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.
- 2.12 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

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)

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.

- 2.13 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.
- 2.14 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

- 2.15 The area of the Site that is proposed to be changed as part of this application scheme is a localised area at basement level at the entrance to the 1930's 1930s Basement Stair Enclosure well designed by Edward Maufe.
- 2.16 The initial scheme of works proposed for the Site is referred to as Phase 2 (1930s Basement Stair Enclosure) for the purposes of this application.

Existing Heals Basement (1930s Basement Stair Enclosure)

- 2.17 As stated above, the application Site comprises a localised area within the wider basement area currently in use by Heals. At basement level this area comprises the south west quarter of the larger urban block; both in retail and back office use. 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).
- 2.18 The wider area at basement level includes elements from a number of different historical stages in the evolution of this building. This includes part of the post 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, and also the sympathetic 1930s extension by Sir Edward Maufe to the south and along Alfred Mews. This basement area also includes smaller parts of the earlier 19th century stores and workshops / factory established by Heals; now largely confined within the depth of the plan. 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 20th century store), which shows the localised extent of the application Site at basement level (outlined in red).

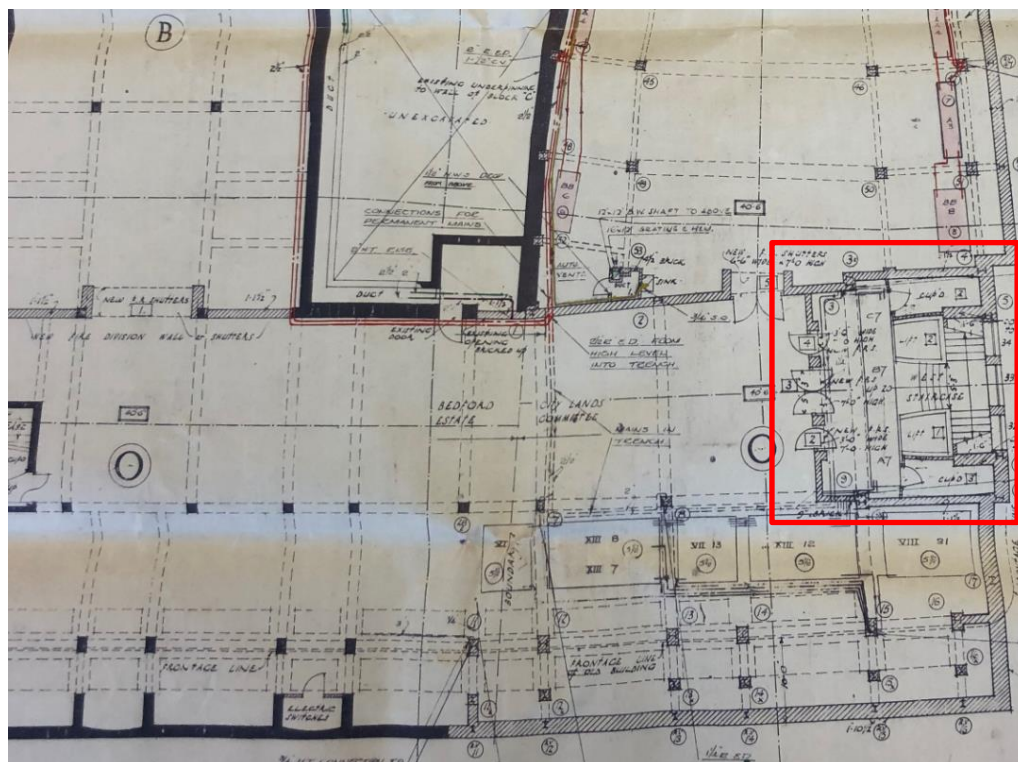


Figure 2.1: Extract of 1937 Basement Plan (Site Location outlined in red)⁸

- 2.19 As found today, this area of the basement level remains in use by Heals and accordingly retains a level of historic interest through that association and function. The retail spaces (former showrooms) towards the frontage are perhaps more important historically relative to the back of houses spaces deeper within the plan. However, overall these rooms and spaces have a simple, even utilitarian, character internally, which has largely been determined by more recent refurbishment of both retail and office spaces 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.
- 2.20 There are exceptions, however, to this assessment of the relative contribution of this part of the Heals basement area to the significance of the listed building as a whole. These are the two main staircases (circulation cores) that rise through the building and reach down to this lower basement level. The first and most important in terms of architectural and historic interest is the grand spiral staircase with the depth of the plan and as part of the key early 20th century store redevelopment led by the architects Smith & Brewer. The later 1930s (Maufe) dual staircase and lift cores to the south west corner of the plan for part of the then expanded store, which also have a high degree of heritage significance due to their historic interest and architectural / design quality.

⁸ City of London (London Metropolitan Archives)



Figure 2.2: Photograph of the 1916 spiral staircase within the Heals Store at basement level (modern infill to original framed opening)



Figure 2.3: Photograph of the 1916 spiral staircase as viewed from basement level looking upwards through the central well

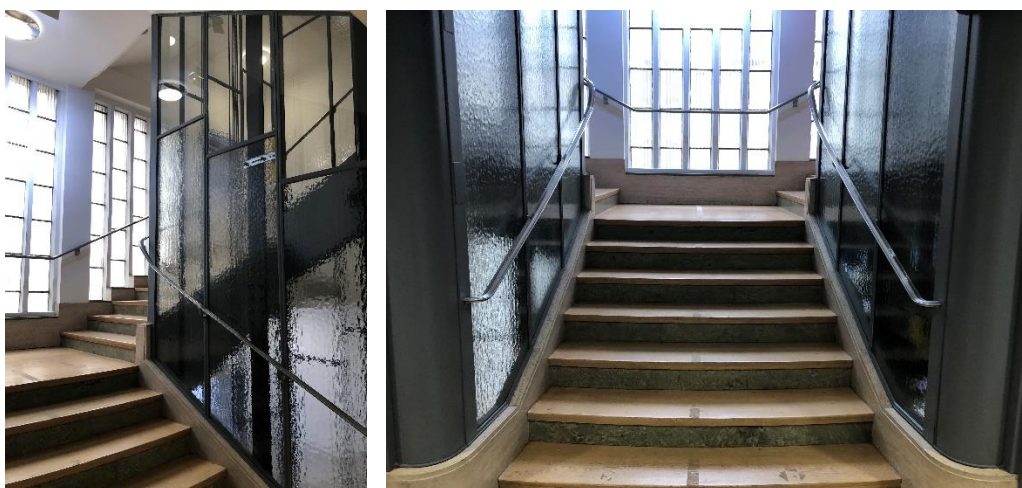


Figure 2.4: Photographs of the 1930s dual staircase and lift cores as viewed at ground / first floor level

- 2.21 As detailed above, the application site forms the current entrance to the Maufe designed 1930's stair at basement level (Figure 2.5). It is evident from an on-site visit and historic drawings of the building that the entrance area has been altered over time to accommodate the growth of the wider complex. Comparison of the 1936 drawings and the existing situation demonstrate this change (Figure 2.6)



Figure 2.5: Existing Entrance to 1930s stair at basement level

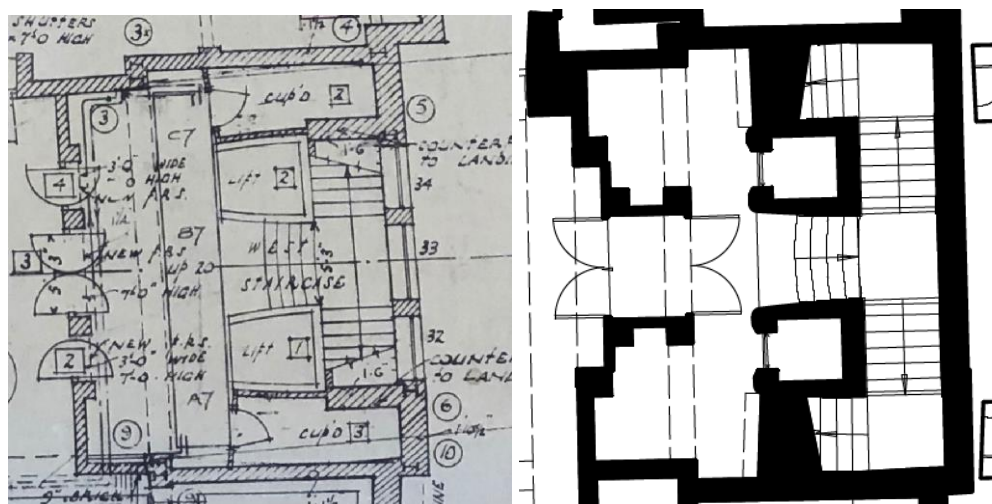


Figure 2.6: 1936 basement drawing (left), existing basement drawing (right)

- 2.22 These drawings demonstrate that the historic entrance would have featured three door openings where there is now only a single double door entrance with new partitions either side. As a result, while opening up works have yet to be carried out it is considered that the existing fabric to the entrance area of this historic stair is a modern/later addition.
- 2.23 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. A more localised plan for the purposes of this application have been included here for ease of reference (Figure 2.6). 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 2.7: Basement Level: Relative contribution of elements / areas to significance

3. Application Scheme and Heritage Impacts

Application Scheme

Overview

- 3.1 The area of the Site that are proposed to be changed as part of this application scheme is a localised area at basement level at the entrance to the 1930's 1930s Basement Stair Enclosure well designed by Edward Maufe.
- 3.2 The initial scheme of works proposed for the Site is referred to as Phase 2 (1930s Basement Stair Enclosure) for the purposes of this application. These proposals are described in full through the design material prepared by the appointed architects White Read Architects (WRA), including proposed (annotated) drawings and their Design and Access Statement (DAS).
- 3.3 This supporting material describes how these carefully considered internal alterations will improve the existing entrance to the 1930s Basement Stair Enclosure well by removing the modern fabric and reinstating the historic layout in this location. As part of a sensitive and focussed design approach, these early stage enhancements will work with the existing historic building fabric and features, remove modern additions internally, and also take the opportunity to reinstate the historic 1936 layout at basement level, which is considered to be a heritage benefit for the use and design of the listed building.

Impact Assessment

Phase 2 – 1930s Basement Stair Enclosure

- 3.4 Our baseline appraisal of the significance of the listed building has established that as found today, the area of proposed change is predominately modern which has largely been determined by more recent refurbishment of both retail and office spaces at this level. This area is of lower significance relative to the retained historic plan form and structure. Nonetheless, it forms the entrance to the 1930s dual staircase and lift cores to the south west corner of the plan for part of the then expanded store which has a high degree of heritage significance due to their historic interest and architectural / design quality.
- 3.5 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 scheme features the creation of new openings at basement level to the existing entrance to 1930s stair to improve access and circulation more generally. New openings would affect the existing predominantly modern partition which is of little, if any, heritage interest, as a result of the substantial modern reconfiguration and alteration of this element of the plan. The new glazed doors and fixed panels are to be installed where partitions can be removed to open up access to the Art Deco staircase. The existing bronze wheel, which appears to be an original/early feature of the building to the north partition proposed to be removed, will also be retained as part of the proposals. The existing historic

double doors will also be retained as part of these proposals. This is a change that would sustain the significance of the listed building.

- 3.6 Although the physical changes proposed internally are not considered to impact upon the heritage significance of the building in this location, the reinstatement of the historic plan form at this location and use of high quality materials is considered to be a heritage benefit.
- 3.7 It is to be noted that this scheme is effectively a minor revision to the wider works at Basement level (Phase 2), 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.
- 3.8 On the basis of our appraisal of the particular significance of the listed building and the localised area which comprises the Site, it is our assessment that these works would not cause harm, or otherwise adversely affect the particular heritage significance. These are relatively minor works which would primarily impact 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. In addition, the reinstatement of the historic plan form at this location is considered to be a heritage benefit.

Compliance with relevant Legislation and Planning Policy

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

- 3.9 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, or to a degree enhance, the special interest (and setting) of the listed building on Site.

National Policy - NPPF 2021 and NPPG

- 3.10 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.
- 3.11 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.

- 3.12 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.

Development Plan

London Plan 2021

- 3.13 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

- 3.14 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

- 3.15 In summary, the relevant built heritage considerations in the determination of this application for internal refurbishment works are potential direct impacts on the significance of the designated heritage asset and listed building Heals Building (Grade II*).
- 3.16 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.
- 3.17 It is our further assessment that that the proposed scheme of works (Phase 2) 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. In particular, the reinstatement of the historic plan form at this location is considered to be a heritage benefit.

Appendix 1: Baseline Heritage Appraisal, December 2021

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