

Heritage Statement

Phase 5 – Sixth Floor Internal Alterations

Heals Building, 196 Tottenham Court Road,
W1T 7LQ

September 2022

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Our reference
GENH3002

September 2022

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 of the existing modernised office spaces at sixth floor level the Heals 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 store. This is referred to as Phase 5.
- 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, 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 alterations will enliven the existing office space. As part of a sensitive and focussed design approach, these enhancements will work with the existing building fabric, retain the existing windows and historical features, whilst only removing and or replacing modern additions internally.

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 requested that these Phase 5 works be subject an application for consent, although they have raised no objection to these specific proposals. During pre-application discussions with both the LBC and HE, both parties have 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 5) 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 light touch refurbishment works (Phase 5) for the existing modernised office space at sixth floor level within this larger listed building complex would conserve this designated heritage asset, and also sustain 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)

- 2.17 As a result, it is assumed that this area dates from potentially the extension works in the 1960's to the neighbouring Brook House as part of the works to the wider complex during this time. It is known that this area was refurbished in 1984 and was again refurbished as part of the works undertaken in 2013. The interior of the space is considered to be of little to no heritage interest as this area has been subject to a high degree of change both to the fabric and plan form.
- 2.18 Overall, this office space has been left largely un-touched since a previous comprehensive commercial-led refurbishment in the 2000s. It is our assessment therefore that the existing modernised fabric, features and character of the internal condition of these spaces are not elements that contribute to the understanding or appreciation of the significance of the listed building as a whole. The broader plan form and structure of these parts of the larger complex (particularly the 1936 staircases to either end), which would not be affected by this scheme, do otherwise contribute to that heritage significance.

3. Application Scheme and Heritage Impacts

Application Scheme

- 3.1 The scheme proposals are described in full through the design material prepared by the appointed architects White Red, including proposed (annotated) drawings and their Design and Access Statement (DAS).
- 3.2 This supporting material describes how these carefully considered alterations will enliven and breathe new life into each of the existing office space, and therefore the use and appearance of the larger building complex as a whole. Whilst sensitively avoiding impact on any historic fabric and or features that contribute to the significance of the listed building.

Impact Assessment

Phase 5 – 6th Floor Office Space

- 3.3 Our baseline appraisal of the significance of the listed building has established that the existing largely modernised fabric, features and character of the internal condition of this office space are not elements that contribute to that significance. Importantly, the exterior and also the broader plan form and structure of these areas within the larger building complex would be retained and not otherwise affected by this proposed light-touch refurbishment and soft strip scheme. Overall these are relatively minor works in terms of the scale, complexity and also varying heritage interests of this building.
- 3.4 The application DAS and full drawing prepared by the architects describes in illustrated detail the proposed works in terms of the retention, removal and or replacement of internal elements within this office space. The purpose of this new fit-out is to remove the features listed below which date from the 2000s and then refurbish these spaces to create more attractive and appealing office space for the building complex as a whole. These features include:
 - Removal of meeting rooms to provide open flexible office space.
 - Removal of suspended ceilings and existing light fittings. Exposed ceiling soffit with suspended LED lights to provide a consistent aesthetic across the office floor.
 - New and consistent floor and wall finishes to create a fresh and consistent finish across the office floorplate.
 - Refurbished teapoint and refreshed finishes to existing WCs
- 3.5 This scheme (Phase 5) 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 landmark 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. This next stage of a broader fit-out is seen as a critical

part of enabling the building to become fully occupied during 2022, whilst the wider strategic vision for the building is being further developed.

- 3.6 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 light-touch refurbishment works would not in any way harm, or otherwise adversely affect that heritage significance. These minor works would only effect modern fabric or features, and would not alter the form, character and or appearance of these largely modernised areas to any degree that would affect or detract from the listed building's special interest.

Compliance with relevant Legislation and Planning Policy

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

- 3.7 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 (i.e. have no effect on) the character and appearance of the surrounding conservation area.

National Policy - NPPF 2021 and NPPG

- 3.8 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.
- 3.9 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 this complex.
- 3.10 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 this heritage asset would be conserved and its significance sustained as a result of these minor works.

Development Plan

London Plan 2021

- 3.11 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

- 3.12 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 (i.e. have no effect on) the character and appearance of the surrounding conservation area.

Summary and Conclusions

- 3.13 In summary, the relevant built heritage considerations in the determination of this application for minor internal refurbishment works are potential direct impacts on the significance of the designated heritage asset and listed building Heals Building (Grade II*).
- 3.14 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.
- 3.15 It is our further assessment that that the proposed scheme of works (Phase 5) for this modern office space area within this larger listed building complex would overall conserve this designated heritage asset, and also sustain its significance. It is important to reiterate that no historic fabric or features of the listed building would be lost or altered as part of this scheme. No harm to heritage significance would arise, and 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.

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

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