



Heritage Impact Assessment
for proposals at
22 Tower Street, WC2H

For Constructive Space

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1.0 Background

This impact assessment forms part of an application for Listed Building Consent for works to the fourth floor of 22 Tower Street. The works for which this application relates involve installation of a new floating floor to the fourth floor of the building, a tea point and fixed furniture items, all associated with a new office fit-out to enable use of the currently vacant floor.

2.0 List description and planning context

2.1 List description:

22 Tower Street was listed at Grade II on 15th January, 1973:

Board School, now converted to offices. c1874, altered late C20. Yellow stock brick with red brick and stone dressings. Steep slated roofs with gabled end bays, tall brick chimney-stacks and parapets. EXTERIOR: mainly 4 storeys. Not quite symmetrical composition of 2:1:3:1:2 windows with projecting end bays; 5 storey bell tower bay to left of entrance. Moulded floor strings. Central 3 bays divided by pilasters supporting a parapet of blind panels; 3rd and 4th floors set back with late C20 glazed wall and curved roof below original lunettes. Main central entrance with stucco doorcase of paired banded pilasters carrying an entablature and rectangular overdoor with pilasters, flanked by ball finials, supporting a scrolled pediment with ball finial; round-arched doorway with panelled door and fanlight. Most windows round-arched with keystones; those flanking overdoor have gauged brick flat arches. 4th floor left hand bay, window with apron of 3 carved stone plaques with floral and foliar enrichment and inscribed "For LSB"; left hand bay, window with similar apron inscribed "1874". Right hand return has chimney-stack rising full height of building with 2 pedimented features. To left of chimney at 3rd floor height, a carved stone plaque, in rubbed red brick surround, depicting an angel showing a book to 2 young children. INTERIOR: altered.

22 Tower Street was built as the Tower Street Board School, set up by the London School Board – a local government institution set up in 1870 to build and run schools where there were insufficient places within voluntary establishments. The LSB, and the policies and infrastructure it developed, were an influential force on London schooling long after the body was abolished in 1904. The building remained a school and was little changed into the 20th century. However, on the 1938-40 OS map, the building is no longer labelled as a 'school'. In 1948, MGM Pictures Ltd put forward an application to convert the premises for their own use. It is unknown whether or not these plans ever came to fruition – a memo in the Building Act Case File relating to No.22 suggests that MGM pulled out of at least part of these proposals.



By 1953, No. 22 Tower Street had become occupied by William Comyns & Sons Ltd, silversmiths. Comyns & Sons Ltd went into liquidation in 1987 – the same year that applications were put forward to convert the building into office space.

2.2 Planning History

Upon researching the planning history of the building, a number of historic applications relating to the site were found, although by far the most extensive of these were confined to the years 1987-1990. During this period the building was divided up internally into office space. This was done through the insertion of new partition walls on all floors, the removal of the 2nd floor in its entirety and the installation of new 2nd and 3rd floors in its place, and the insertion of new mezzanine floors. Externally, a large rear conservatory and a 'winter garden' extension to the front elevation at second/third floor level were added, and changes took place to the fenestration. Other applications which were granted permission include basement excavations beneath the new conservatory extension, and renewal of railings and bollards outside the property.

The following planning approvals are included as they specifically relate to the fourth floor:

13/04/1988 - Alterations and refurbishment works including the excavation at basement level to provide additional floorspace the erection of a single storey side extension partly into the rear yard and the erection of a lift tower. Granted with conditions

This appears to be the consent where the present office conversion was originally approved.

16/02/1989 - Application for Planning, Listed Building and Conservation Area Consent -1. External restoration of the building including the reinstatement of all missing features (ie. stone copings cappings and finials etc.) 2. The net addition of one floor between the existing first and third floors and modifications to the fenestration of the rear elevation to accord with it 3. The installation of a glazed "winter garden" at second/third level front elevation 4. A single storey conservatory extension at the rear. Granted with conditions

This consent resulted in significant changes to the building that are clear today, some of which have received consent to reverse or alter under recent applications by Claridge Architects.

06/08/1992 - Installation of internal partitions to fourth floor including high level glazing. Granted Listed Building and Conservation Area Consent

These appear to have been not implemented or were removed following the 2018 application to 'soft strip' the interior.

16/12/1994 - *Alterations to provide new internal partitioning to 4th floor including high level glazing.*
Granted Listed Building and Conservation Area Consent
These appear to have been removed following the 2018 application to 'soft strip' the interior.

17/12/1998 *Internal partitioning to lower ground, third and fourth floors.* Granted Listed Building
Consent with Conditions
There are no drawings available in connection with this application. We assume that these partitions were
all taken out following the 2018 consent.

14/12/2010 *Replacement of existing windows to the third and fourth floor level of Tower street elevation
with new timber windows (reference 2010/5790/L)* Granted with conditions.
The officer's report notes: "The windows to be replaced are non-original double glazed timber units,
installed in 1989. No loss of historic fabric would result from their replacement. It is considered that the
proposed works will preserve the appearance of the Listed building and are therefore acceptable."

26/11/2014 *Change of use and conversion from offices (B1) to 22 residential units (C3)*
(reference 2014/3425/P) Granted with conditions
A significant change of use for the building that was not implemented.

09/10/2018 *Internal soft strip-out of the building in advance of refurbishment (reference 2018/3946/L)*
Granted with conditions
The proposals were to remove many of the partitions and ceilings that were inserted in the late C20 to
investigate the structural integrity of the building and to create open plan offices. It was deemed that: "No
historic fabric will be affected by the changes and the legibility of the building will be improved as a result
of the alterations. The proposed works will not harm the special interest of the grade-II-listed building."

11/02/2020 *Internal and external alterations, replacement of rear conservatory with single storey rear
extension and construction of first floor front and side extension (reference 2019/0737/L)* Granted with
conditions (alongside associated planning consent).
This application by Claridge Architects is extant and covers substantial changes to the exterior and more
minor but still significant changes to the interior. The works have at least in part been undertaken and
there are also some related applications for non-material amendments to the consent. In terms of the 4th
Floor, this application included removal of the mezzanine. We assume that the current iteration of the
interior is subject to this consent.

2.3 Planning policies

2.3.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 is the primary legislative instrument addressing the treatment of listed buildings through the planning process in both England and Wales.

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act of 1990 sets out the statutory duty of the decision-maker, where proposed development would affect a listed building or its setting:

"...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"

2.3.2 National planning guidance for England is set out in the NPPF (National Planning Policy Framework) where Section 16 Conserving and Enhancing the Historic Environment sets out national planning guidance of relevance to this case:

Paragraph 189 states 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

Paragraph 192 of the NPPF applies to this application too:

"In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness."*



Paragraph 193 (considering the decision-making process) states that:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

Paragraph 196 offers argument in support of minor alterations or improvements to a Listed Building:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

2.3.3 The relevant Development Plan comprises Camden Council's Local Plan (which was adopted on 03 July 2017).

The key policy of relevance to potential proposals concerning this building is Policy D2, which covers the Historic Environment and sets out the following:

"The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets."

Designated Heritage Assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

d. the harm or loss is outweighed by the benefit of bringing the site back into use.
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.

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- k. resist development that would cause harm to significance of a listed building through an effect on its setting."

These expectations of the local plan have all been considered as part of this application, and the proposals have been developed to ensure that they comply with the expectations of each.

3.0 Heritage Impact Assessment – summary of impact

3.1 *Location of work to be carried out:* 22 Tower Street

3.2 *Management Unit:* The fabric of 22 Tower Street

3.3 *Significance of management unit:* The property is listed at Grade II, the listed building description is included above. Key considerations of the building's significance are:

- The building is listed 'GV' – Group Value, meaning that its significance is in its part in the streetscape and surroundings rather than in the building itself.
- The former school board building is in a good state of repair. Most if not all of the external joinery has been replaced and this has had an impact on its significance.
- Conversion works carried out in the late 1980s had an impact on the significance of the building, but this has been tempered by works in the last few years in further conversion and re-ordering works, successful in removing many of the intrusive alterations.
- The interior of the building retains little or no historic fabric. The roof trusses to the fourth floor are among the only aspects of the historic building that are still visible.

3.4 *Current condition of management unit:* The building is in good condition and appears well maintained. Relatively recent repairs and alterations to the building appear to have been well carried out and have had a positive impact on its condition.



3.5 Description of proposed works:

The proposals are associated with a new office fitout for the fourth floor. The current lighting and heating installation will be unaffected by the proposals. Additional small power requirements will utilise the existing ample service routes and no further interventions will be needed. The principle behind the design of the fitout is around utilising free-standing furniture items where possible rather than built-in fitout so that physical intervention with the listed building is minimised. The floor structure has been reviewed and is ample to take the additional loadings.

The proposals are described in the drawings associated with this application, LIG_A_4_GA_EXT, LIS_A_4_GA rev.D, LA_A-4_PAR rev.B and LIG_A_4_EL11, rev.C

The aspects that we are seeking consent to implement are covered in detail below:

- 3.5.1 Install new floating floor to the fourth floor of the building
- 3.5.2 Install new tea-point within fourth floor to serve the users of the office space
- 3.5.3 Install fixed furniture items to the internal walls of the fourth floor

3.6 Assessing the impact of proposals

- 3.6.1 Install new floating floor to the fourth floor of the building

	Question	Answer	Risk Level
Impact	Could the proposal put the significance of the heritage assets at risk?	The floor has already been installed, but in our opinion, these works were implicit in the consent already implemented under reference 2019/0737/L covering the current office conversion works. The reason that we are including it within this application is so that an explicit consent exists for the works already undertaken alongside one for the fit-out proposals that the client wish to undertake. This approach means that the significance of the heritage asset is protected.	Low risk
Knowledge and Understanding	Do you have enough information to avoid any risks?	The build-up that has been utilised for the floor is one that has been specified by the building's management company and as such has been utilised on other floors within the building. This also means that it is an approach that would have consent for use elsewhere in the building.	Low risk



Impact	Will the proposal improve the condition and/or the significance of the heritage assets?	The proposals have a neutral or positive effect on the significance of the heritage asset and its condition. This is because they have been tested elsewhere within the listed building and also present a high-quality finish which will mean that, going forward, the quality of future interventions are more likely to be of high quality and therefore have a positive impact on condition.	Neutral risk
Knowledge and Understanding	Is there enough information to improve condition or significance?	There is enough information for us to be confident in the improvement of the condition and significance of the building because, having investigated the position before the flooring was installed, we are aware that it was made up of plywood sheeting over a modern steel and timber floor structure.	Very low risk
Avoiding Impacts	If there are risks, can the work be designed to avoid problems?	We do not consider that there are any risks resulting from the proposals themselves. The only risk could have been if there was historic fabric that would either be stripped out or could have been damaged as a result of the works. We know that the base floor layer (which is still in place below the existing floor as installed) is modern in construction, and that other peripheral fabric, such as wall finishes and joinery, are all contemporary.	Very low risk
Avoiding Impacts	Are there alternative options?	Alternative options could have been a carpeted floor or another material. We believe the hardwood engineered floor laid over insulating underlay and chipboard over the existing plywood is the best of the likely alternatives.	Higher risk (if alternatives were pursued)
Conclusion	The proposal is pragmatic and already tested in other sections of the building under the extant consents. We consider it to be a positive approach that does not present a risk to the significance of the heritage assets.		

3.6.2 Install new tea-point within fourth floor

	Question	Answer	Risk Level
Impact	Could the proposal put the significance of the heritage assets at risk?	The proposal is to install a work surface, plumbing and small power, as well as splashback and high-level storage on the north-west wall of the fourth floor. There is already a false wall in place that appears to have been fixed with brackets to the external wall. This provides a void for running the plumbing and will provide a link into the adjacent service riser. A current hatch exists for connection to the services so there would be no new openings required to gain access. To this end we consider that that the proposal would not put the heritage asset at risk.	Very low risk
Knowledge and Understanding	Do you have enough information to avoid any risks?	We've inspected the part of the building in detail, and owing to the ample service void, existing service riser and proposed construction, there is little or no risk to the heritage asset arising from these proposals.	Very low risk

Impact	Will the proposal improve the condition and/or the significance of the heritage assets?	The proposal has a neutral effect on the significance of the heritage asset and its condition. The benefit in having a self-contained tea point is that it confines plumbing and services to a finite area, which offers a positive impact overall.	Neutral risk
Knowledge and Understanding	Is there enough information to improve condition or significance?	Based on experience of office fitouts within historic contexts, there is a benefit to confining plumbing and services to a particular area, and one that is already served with power, water and drainage.	No risk
Avoiding Impacts	If there are risks, can the work be designed to avoid problems?	The location chosen is the optimal location in terms of the fabric and services provision that already exists. We therefore are of the opinion that there are no risks to the building in the pursuit of this option.	No risk
Avoiding Impacts	Are there alternative options?	There are no better or less impactful alternatives	Higher risk (if alternatives were pursued)
Conclusion	The proposed tea-point location and installation strategy offers a well-considered approach to the requirement for these facilities within the office fit-out.		

3.6.3 Install fixed furniture items to the internal walls of the fourth floor

	Question	Answer	Risk Level
Impact	Could the proposal put the significance of the heritage assets at risk?	The proposed office fit-out will utilise mostly free-standing furniture but there will be some items that require screw-fixings into the existing walls. The fixings are minimal in nature and as such do not put the heritage asset at particular risk.	Very low risk
Knowledge and Understanding	Do you have enough information to avoid any risks?	Having inspected the construction of the walls, these are formed from brick with a plastered finish. Some of the brickwork we could see within floor voids and the like appeared to be extruded red engineering brick so may have been as a result of previous making good in any case, this type of brick being atypical of Victorian construction.	Very low risk
Impact	Will the proposal improve the condition and/or the significance of the heritage assets?	The proposal has a neutral effect on the significance of the heritage asset and its condition. The office use could be considered to be the building's 'optimum viable use' under the NPPF, so to that end the fitout will have a positive impact given that the fourth floor is currently unoccupied.	Neutral risk (positive improvement)



Knowledge and Understanding	Is there enough information to improve condition or significance?	Based on our investigations, we are confident that the improvements to the viability of the building's use outweigh any potential for risk to the building that the proposals could present (we believe that they don't present a risk at all).	No risk
Avoiding Impacts	If there are risks, can the work be designed to avoid problems?	There are no risks that could be mitigated by an alternative fixing method.	No risk
Avoiding Impacts	Are there alternative options?	There are no better or less impactful alternatives	Higher risk (if alternatives were pursued)
Conclusion	The proposed free-standing fit out is the least impactful approach to providing optimum viable use, and the very minor impacts presented by the fixings for some of the furniture into the walls are offset by the benefits to the building's ongoing maintenance and are arising from its continued use.		