

SUMMARY OF PROOF OF EVIDENCE

**ALEC FORSHAW, ON BEHALF OF
SAVE BRITAIN'S HERITAGE**

456-472 OXFORD STREET, LONDON W1C 1AP

APPLICATION REF: 21/04502/FUL

APPEAL REF: APP/X5990/V/22/3301508

1. I set out a brief description of the development and the site.
2. I set out the relevant policy framework and guidance.
3. I assess the significance of the designated and non-designated heritage assets that are potentially affected by the development proposals, including Orchard House, Selfridge's Building, the Mayfair, Portman Estate and Stratford Place Conservation Areas, and nearby listed and unlisted buildings.
4. I assess the impact of the proposed development on the significance of the heritage assets, including long, medium and close-range views.
5. I evaluate the scheme against the criteria of achieving well-designed places.
6. I consider the scheme in terms of compliance with national and local policy and guidance for conserving the historic environment.
7. In undertaking an exercise of balancing harm against public benefit I assess the public benefits that are claimed by the applicant, including heritage benefits, architectural merits of the proposal, the regeneration of Oxford Street, retail provision, office floorspace and public realm. I conclude that the level of public benefit does not outweigh the degree of harm to heritage assets caused by the proposals.
8. I consider alternative options for the site, including the potential re-use of the existing buildings, set in the context of example of the repurposing of other former department stores in London and elsewhere in the UK.
9. I summarise the compliance with sustainability and climate change policies covered in the evidence of Simon Sturgis and Julie Godefroy.
10. I conclude that the proposals cause a considerable amount of less-than-substantial harm to designated heritage assets. I consider that the proposals cause the total loss of an important non-designated heritage asset. I consider that the Council has undervalued both the importance of these heritage assets and the degree of harm that the proposals cause, and that the Council has overvalued the public benefits that it believes the scheme creates. I believe that equivalent public benefits could be achieved by an alternative scheme that does less harm and which more effectively preserves and enhances heritage assets. I consider that there are no material considerations that justify the breaches in policies for conserving the historic environment and concerning sustainability and climate change. I request that the scheme be refused planning permission.