

THE SEVEN DIALS TRUST

68 Dean Street London W1D 4QJ UK

Tel: 020-7437-5512 | Mob: 07855-256860

info@sevendials.com | www.sevendials.com



Matthew Mason
Area Planning Officer
Place Shaping and Town Planning
Westminster City Council

16 March 2023

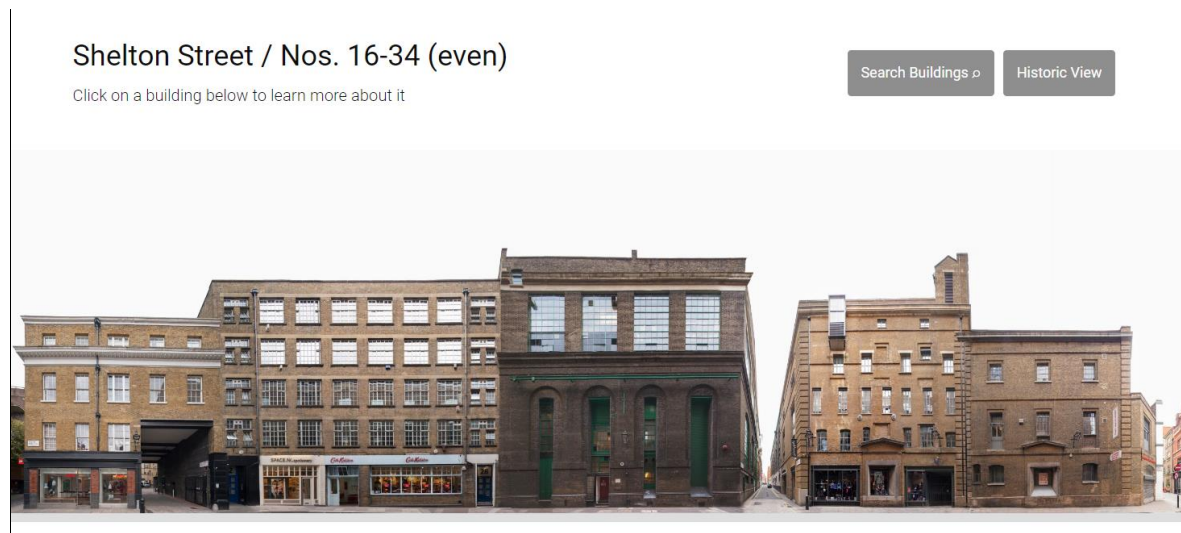
Your Reference 22/02009/FULL and 22/02163/LBC

Dear Matthew

Old Brewer's Yard, 28-32 Shelton Street, 15A Neal Street, 5 and 7 Langley Street, 1 and 3 Mercers Walk and 107-115 Long Acre

We refer to the current applications for planning permission and listed building consent which are due to be considered by the Planning Committee on 21 March 2023. This letter deals solely with the proposed roof extension on Shelton Street. The Seven Dials Trust (SDT) raised strong objections to the original proposal because of its unacceptable height and bulk and design.

The Seven Dials in Covent Garden website includes useful information about the existing buildings on the site: [Nos. 28-32 \(including Brewers Yard\), Shelton Street \(sevendialscoventgarden.study\)](http://sevendialscoventgarden.study)



From the Seven Dials Trust web study: [Nos. 16-34 \(even\) \(sevendialscoventgarden.study\)](http://sevendialscoventgarden.study)

The SDT stresses that it does not object to the principle of a roof extension on this building, but considers that any extension has to respect the character and appearance of the existing building and the Covent Garden Conservation Area, and also not harm the setting of the adjacent listed buildings. We consider that the revised design, although an improvement on the original proposal, is still unacceptable in design and heritage terms.

The revised design

Members of the SDT, CGCA and CGAT had a meeting with RKD Architects on 5 January 2023. The architects showed us a revised design which we understood had already been shown to officers. We welcomed the reduction in height and bulk of the proposed roof extension but raised concerns about the revised design in terms of its highly glazed nature, and its lack of set back from the front facade.

We wrote a joint letter to the architects, an extract of which is attached below as Appendix 1. However, our comments appear to have been ignored and the revised design for the roof extension remains as presented to us at the meeting. We consider that the consultation with us was tokenism and the applicant seems to have had little or no intention of revising the design.

The images in this letter are taken from the revised Design and Access Statement dated 9 February 2023

Contrary to Westminster City Plan Policy

We consider that the proposed roof extension is contrary to the design and heritage policies set out in the Westminster City Plan and should be resisted.

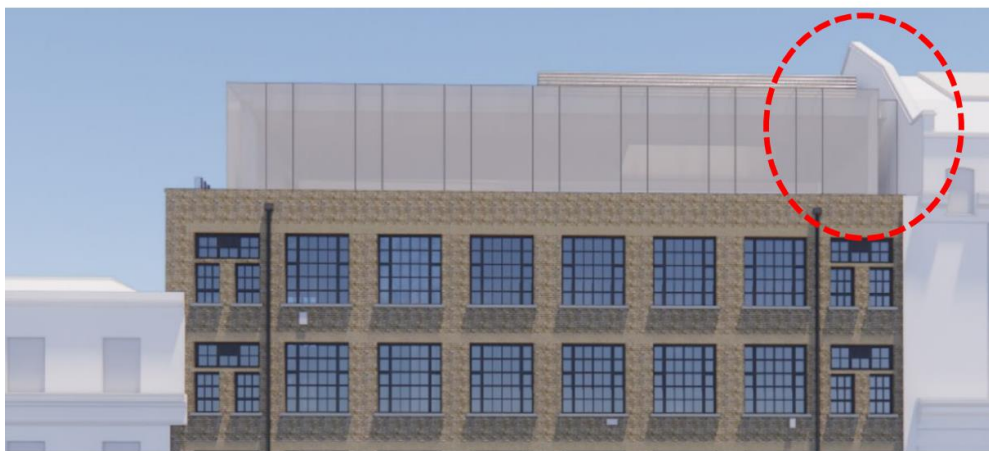


Fig. 10 View of model showing junction with adjacent building to the West



View from the Seven Dials Conservation Area to the north (as proposed)

Policy 40E 'Roof Extensions' states:

Roof extensions will be supported in principle where they do not impact adversely on heritage assets and should:

1. where part of a terrace or group already characterised by roof additions or alterations, be of appropriate design which follows an established form and would help to unify the architectural character of the existing terrace or a group;
2. where part of a terrace with an existing roof line unimpaired by roof extensions, take a coordinated approach, adding roof extensions of consistent and appropriate design to each property across the terrace;
3. in other locations, be of appropriate design sympathetic to the architectural character of the existing building.

The Seven Dials Trust considers that the proposed roof extension is not an appropriate design for this traditional, brick faced semi-industrial building. The extension does not follow an established form, which will help unify the architectural character of the existing group of buildings. It would be alien to the character and appearance of the building, the streetscape and the Covent Garden Conservation Area.

The proposed roof extension will harm heritage assets, namely:

1. the Covent Garden Conservation Area
2. the setting of the Seven Dials Conservation Area
3. the settings of adjacent listed buildings.

To an extent the committee report recognises this when it states:

The façade treatment of the fifth floor is an intentional departure from the robust solidity of the host building and is distinctly contemporary. That said, its set back position from the Shelton Street facade, and solidity exhibited to the eastern façade and roof, to some extent, moderates the glazing. The internal soffit beam, which will be glimpsed through the glazing, provides an appreciable horizontal plane and defined termination to the roof.

That the extension is appreciably different in architectural style will draw some attention and will be visible in key views of the building from within the conservation areas and this element of discordancy is the reason why a low level of less than substantial harm is identified.

Whilst the design of the extension is contemporary and to some extent at variance with its context, except that is for the (largely unnoticeable from street level) glass roof top extension on the Seven Dials Warehouse directly opposite the application site, this is not however considered to detract from the setting or appreciation of neighbouring listed buildings. Any adverse impact is at the low end of less than substantial harm, as has been identified for the Seven Dials Conservation Area as a whole.

In response we would add that:

1. The proposed glazing is only set back 1280 mm from the facade. This is not sufficient to reduce its visual impact in a meaningful manner.
2. The roof extension at 25-33 Shelton is set far enough back from the facades that it is not visible from street level. It is certainly nowhere near as visible as the proposed roof extension will be.
3. The impact of the roof extension will be harmful during the day but also at night when it will be illuminated from within.

The Covent Garden Conservation Area

We consider that a glazed roof extension which is barely set back from the façade would be unprecedented in Covent Garden (or indeed the West End generally), which is a conservation area dominated by a traditional roofscape of pitched roofs, covered in slates or lead. If there are modern roof extensions (and there are few) then they are set back so far that they have little or no visual impact from street level.

Setting of 34 Shelton Street

The roof extension will be seen clearly above no. 34 (listed Grade II) in views from the east, looking west along Shelton Street. This impact is illustrated in the Design and Access Statement. (See below).



We consider that the roof extension would appear as a prominent and incongruous metal and glass structure above the roofscape of no. 34. At night it could appear highly illuminated. The extension would not preserve or enhance the setting of the listed building or the street scene. It would be harmful to the significance of heritage assets, including the Covent Garden Conservation Area and the Seven Dials Conservation Area.

The Committee Report's Conclusions

The report concludes:

The extension proposed to 28-32 Shelton Street is considered to cause a low level of less than substantial harm to the character and appearance of the Covent Garden Conservation Area, the Seven Dials Conservation Areas and to the setting of nearby listed buildings and other non-designated heritage assets. This is largely due to the contemporary design of the roof extension and that it will be visible in key views of the building from within the conservation areas.

The SDT considers that the harm caused by the proposed extension is greater than the committee report states. It would cause much more than a low level of less than substantial harm to the character and appearance of the conservation area and to the settings of the adjacent listed buildings. We do not consider that the benefits of the scheme would outweigh the harm.

An alternative design avoiding harm to heritage assets

The SDT considers that the harm identified can easily be avoided. The SDT agrees with the comments from Historic England who state:

However, the extension would still be relatively prominent and in our view the revised design is not compelling in its context. The extension seeks a deliberate contrast with its surroundings.

Given the particular qualities of the area - notably a consistency in form and materials - it would distract from, and result in harm to, significance.

This harm could be avoided through the development of a more contextual design which better assimilates with the character which makes the conservation areas special, in accordance with relevant policy and guidance.

A more traditional design, or a more sensitive modern contextual design, which reflects the architecture of the existing building, would be appropriate. It would also comply with the City Council's design policy 40, which the proposal does not.

An acceptable design could be generated if:

1. the extension was set back further from the front façade.
2. the height of the proposed glazed facade was reduced.
3. the degree of glazing was reduced.
4. the design was more closely related to the architecture of the facade below.

An irony is that the applicants own HQ office in Great Marlborough Street, illustrated below, has just the sort of roof extension which we think would be more appropriate on the existing building. It is set back from the street facades and is glazed, but within a metal framework. It has a pitched roof above to screen the plant.



We urge the committee to refuse the application on design and heritage grounds. However, if the committee does not wish to do this, then they should either:

1. defer making a decision, to allow the applicant to redesign the roof extension, or
2. if planning permission is to be granted, add a condition which requires the design of the roof extension to be amended substantially.

Any revised design should take on board our advice set out above in order to minimise harm to heritage assets.

Yours sincerely

A handwritten signature in black ink, which appears to read 'R. J. Ayton'. The signature is fluid and cursive, written in a professional style.

Robert Ayton

Seven Dials Trustee, on behalf of the SDT

Copied to:

Cllr Ruth Bush (Chair)

Cllr Paul Fisher

Cllr Mark Shearer

Cllr Nafsika Butler-Thalassis

Cllr Jason Williams

Cllr Jim Glen

The Covent Garden Community Association

The Covent Garden Area Trust

Appendix 1: Extract from Joint letter from CGAT, CGCA and SDT to the Architects

CGAT, CGCA and SDT wish to make the following comments on the revised proposals:

1. Although reduced in overall height when compared to the original proposals for the upward extension of the property, the revised proposals still represent a substantial addition to the building which will be clearly visible in views of the historic brewery complex from street level and nearby buildings. Historic England's advice on the original proposals states that the existing buildings on site 'give the area a remarkable consistency in scale and character, which would be harmed by the proposed roof extension'. CGAT, CGCA and SDT strongly believe that the revised proposals do not do enough to mitigate these potential harms. The proposed roof structure still represents an oversized and over-dominant addition to this important group of buildings within the Covent Garden Conservation Area, and facing directly onto the Seven Dials Conservation Area from where it is most visible. As most visible from within the Seven Dials Conservation Area, the Conservation Area Statement policies should be borne in mind, notably SD 25C. All external works should be carried out in materials that match as closely as possible in colour, texture and type those of the original building or are common in the area."
2. The original design of the proposed roof-top structure was also described by Historic England as 'unsympathetic to its important context'. We believe that this can still be said of the revised design. There are no other examples of 'glazed box' roof extensions in the area that are so clearly visible from ground level. The proposed addition would represent the single most prominent roof-extension of its type in the area and would fail to respond to the prevailing character and appearance of the area. We do not believe that an almost entirely glazed, box-like roof-extension and an oversized and similarly box-like M+E plant enclosure at high level in this location are appropriate.
3. The CGAT, CGCA and SDT urge both the architects and prospective developer to review and fundamentally revise the design of the proposed roof-extension prior to any re-submission to the Council. In this connection, we would point to the design of the top-storey of the Diageo Global HQ at no. 6, Great Marlborough Street as a relevant example of how the upper parts of a large building can be successfully integrated with its historic setting. See photographs attached. Whilst including a significant area of glazing, its impact is reduced by its being set back from the edges of the building; its being contained below lead-covered, hipped, shallow roof-slopes; by the use of lead-faced piers between the bays of glazing; and by the plant enclosure being contained within the leaded roof-slopes. This means that it is barely visible from street-level. The adoption of a similar approach in Shelton Street with a shallow, roof-like form would mitigate the potentially harmful impact of the latest proposals; not least, if the level of the eaves was kept as low as possible and the line of glazing set back further from the building's parapet