

TD/AC/P09034
05/01/2024

Planning Department
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall
Judd Street
London
WC1H 9JE

Dear Sir/ Madam

39 Earlham Street, WC2H 9LT - Application for Planning Permission and Listed Building Consent for the replacement of external fixings; installation of fascia signage and installation of external lighting.

Planning Portal reference: PP-12710372

This Covering Letter has been prepared by Rolfe Judd Planning ('the Agent') on behalf of Shaftesbury Covent Garden Ltd ('the Applicant') to accompany an application for Planning Permission and Listed Building Consent to the London Borough of Camden ('LBC') relating to alterations to external entrance fixings at the address 39 Earlham Street, London, WC2H 9LT ('the Application Site' or 'the Site').

For the purpose of the Planning Application, the description of development is as follows:

'Replacement of external fixings; installation of fascia signage and installation of external lighting.'

This Covering Letter should be read in conjunction with the following additional documents which accompany the application:

- / Application Forms;
- / Community Infrastructure Levy Form;
- / Design and Access Statement & Heritage Statement (this covering letter) – prepared by Rolfe Judd Planning;
- / Site Location Plan (drawing no. A-001-P1) – prepared by Fresson and Tee Architects;
- / Existing and Proposed drawings - prepared by Fresson and Tee Architects;
 - o Front Elevation & Section As Existing (drawing no. A-100-P1);

- Front Elevation & Section As Proposed (drawing no. A-200-P2);
- Photographic Schedule As Existing (drawing no. A-110-P1);

The requisite application fee of £293.00 (excl. VAT) has been submitted online via the Planning Portal.

Site Description & Location

The application site is an existing Grade II Listed building located within the Thomas Neal Centre, a commercial shopping centre positioned within the Seven Dials area of Covent Garden. The site lies within the authoritative bounds of the London Borough of Camden.



The application site consists of four storeys in Class E use; commercial uses are located on ground and first floor levels while the remaining building consists of office spaces. The entrance to which this application relates is located on the southern façade of the building facing onto Earlham Street.

The surrounding area is categorised by a variety of residential and commercial uses, including Seven Dials market almost immediately to the east, located less than 20m away from the application site. Earlham Street, a cobbled pedestrian and cycle only street leading towards the historical Seven Dials scenic point, consists of a variety of eateries and commercial businesses pertaining to the southern side of the Thomas Neal Centre to its north, and lined by residential and commercial premises opposite, to the south.

To the east lies Oldham's Walk, a residential courtyard inclusive of commercial shops at ground level; to the south a similar urban form prevails, with further commercial and residential spaces, as well as the discernible 13-storey Orion House business centre approximately 80m southwest of the site. To the north lies the northern façade of the Thomas Neal Centre, further beyond which lies Shorts Gardens; a street of a similar nature to the surrounding locale, additionally leading towards Seven Dials scenic point.

Covent Garden, the most proximal underground station to the site, lies approximately 200m southeast. The

area has a highly accessible PTAL rating of 6b.

In addition to the above, the application site pertains to the following environmental considerations:

- / Flood Zone 1
- / Central London Area (Local Plan Centres)
- / Town Centre Secondary Frontage
- / Archaeological Priority Area

Heritage Statement

The site lies within the historic Seven Dials Conservation Area. The host building, categorised under 'The Crafts Centre' covering 29-43 Earlham Street and 8-26 Shorts Garden, is Grade II Listed (List Entry Number: 1342094), surrounded by a large concentration of similarly listed buildings. Historic England listed the buildings categorised under The Crafts Centre (previously 'Earlham Street') in 1988, and describes them as follows:

Warehouse, probably originally a brewery; now a crafts centre. Mid C19. Stock brick; roof not visible. 3 storeys. 19 bays to Earlham Street, No.43 with splayed corner and return to Neal Street. Shorts Gardens elevation of 2 storeys. Brick band above ground floor. Segmental headed windows and doorways, those to ground floor on Earlham Street elevation set in segmental headed reveals.

The following buildings located within or adjacent to the Thomas Neal Centre, not categorised under 'The Crafts Centre', are similarly listed and form part of the site's heritage context:

- / 2 Shorts Garden, Grade II Listed (LEN: 1378663)
- / 4 & 6 Shorts Garden, Grade II Listed (LEN: 1378664)
- / 37 Neal Street, Grade II Listed (LEN: 1322097)
- / 35 Neal Street, Grade II Listed (LEN: 1322096)
- / 33 Neal Street, Grade II Listed (LEN: 1322095)
- / 31 Neal Street, Grade II Listed (LEN: 1322094)
- / 29 Neal Street, Grade II Listed (LEN: 1322093)
- / 27 Neal Street, Grade II Listed (LEN: 1322092)

It is not considered that the proposals will impact the host buildings Listed status, nor the outlined designations applicable to the site. Further consideration regarding the site's heritage is included in the Planning Considerations section below.

Relevant Planning History

Relevant planning history for the application site has been accessed via the Camden Council planning application search.

APPLICATION REFERENCE	DESCRIPTION OF DEVELOPMENT	APPLICATION TYPE	DECISION	DECISION DATE
P14/55/A/27533	39 Earlham Street, London, WC2, for the erection of a part single and part two-storey rear extension for use as a lighting showroom with ancillary facilities, in connection with the workshop/office use on the ground and first floors.	Historic Planning Application	Granted	25/04/1979
9301260 & 9370203	Reinstatement of original entrance via insertion of doors into an existing window opening and construction of stone steps as shown on drawing numbers CB 33/2 and CB 33/7.	Full Planning Permission	Granted	17/03/1994
LSX0304258	Internal alterations and refurbishment at ground to third floor levels.	Listed Building Consent	Granted	28/05/2003
2008/5384/L	Creation of internal openings at ground and first floor levels together with the installation of a roller shutter.	Listed Building Consent	Granted	23/12/2008
2008/5380/P	Use of the first floor level for alternative use as either office (Class B1) retail (Class A1) or showroom (sui generis) in connection with the ground floor retail use (Class A1).	Full Planning Permission	Granted	23/12/2008

As noted, the site has previously been subject to internal and external alterations in support of its ongoing commercial use. It is considered that the proposals contained herein are of a minor nature, similarly supporting the ongoing use of the site and enhancing its commercial setting.

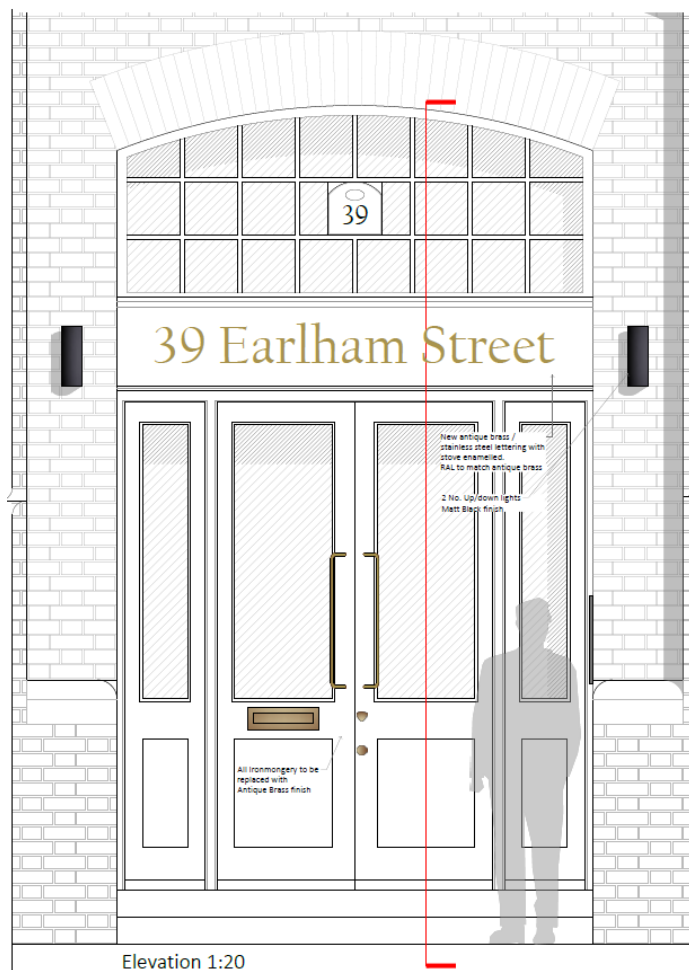
Description of Proposal

Door Alterations and Signage

The proposals will include minor cosmetic alterations to the existing fixings, inclusive of the replacement of the existing ironmongery with an antique brass finish. These replacements will cover the existing door handles, letterbox, and lock features.

Additionally, the inclusion of new antique brass / stainless steel lettering inclusive of stone enamelling, outlining the wordage '39 Earlham Street' within the existing fascia panel above the entrance doors is proposed. The proposed signage will match the antique brass features proposed on the doorway allowing for continuity.

Congruent materials and colours sympathetic to the surrounding area and historic nature of the host building have been selected. Changes to the existing fixings are not overtly perceptible, utilising a neutral palette associated with the style of the existing building and area.



Lighting

The installation of two external lights are proposed on either side of the existing doorway. The lights will expel light in an upwards and downwards direction and include a matt black finish. The lights are not dissimilar in style to those located at the neighbouring 41 Earlham Street ('Flesh & Buns Covent Garden'). An extract of 41 Earlham Street has been included below, noting the appearance of the lighting once illuminated. It is understood that the proposed up / down lighting at the application site will reflect a similar appearance.



Entry Phone Panel

The existing entry phone panel will be replaced with a matt black front plate of the same size, similarly matching the proposed lighting features. The location and use of the entry phone panel will not be altered, with the changes affecting the current outer panelling only (i.e. cosmetic change).

It is noted that similar applications covering external alterations along Earlham Street have been approved, inclusive of down lighting, alterations to fascia's and minor external alterations associated with cosmetic changes. The proposals are congruent with the surrounding area, with suitable finishes reflective of the host buildings historic features. The changes are sensitive to the existing façade and aim to improve the design and function of the buildings commercial setting.

Access

The proposals pertain to above ground works inclusive of minor alterations to external fixings, such that no changes are proposed to the existing access arrangements for the buildings.

Relevant Planning Policies

The proposals have given due consideration to the local Development Plan for Camden. This consists of the following documents:

- / Camden Local Plan (2017)
- / Policies Map Alterations (2017)
- / Site Allocations Plan (2013)

- / North London Waste Plan (2022)
- / The London Plan (March 2021)

Planning Considerations

Policy A1 (Managing the impact of development) outlines how the Council will seek to protect the occupiers and neighbours from unacceptable harm to amenity. The proposals are noted to be minor in nature and will feature low level lighting as a building feature and to assist with wayfinding. It is noted that there are no residential properties located above the ground floor, such that the proposed up/down lighting design will not create any light nuisance to residents at upper floors. The existing area is highly commercial in nature, by which lighting is a common feature within the streetscape, therefore the proposals are in keeping with the character of the surrounding area and will not cause unacceptable harm to amenity above the existing situation.

Policy D1 (Design) recognises that the Council will seek to secure high quality design in development. This includes the requirement for development to consider the following, of relevance to the proposals:

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
- e. Comprises details and materials that are of high quality and complement the local character.*

It is further recognised in the Camden Design SPG that materials should *'respond to existing heritage assets and features by relating to the character and appearance of the area, particularly in conservation areas or within the setting of listed buildings'*.

The proposals are considered to be in full accordance with the above, having accounted for the local context and historic nature of the application site. The materials utilised will be of a high quality, durable nature, suitable to the existing features of the building. The design is considered to be contextual to the host building and neighbouring façades, informed by the buildings existing characteristics and the surrounding streetscape.

Policy D2 (Heritage) identifies that development must preserve and, where appropriate, enhance Camden's heritage assets and their settings. It is noted that the Council will not permit the loss or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings. Policy HC1 (Heritage conservation and growth) of the London Plan outlines how development proposals affecting heritage assets and their settings should conserve their significance by *'being sympathetic to the assets' significance and appreciation within their surroundings'*.

It is not considered that the proposals fall within the (significant) identified works above; the replacement features, signage and introduction of up/down lighting will not cause a detrimental loss to the existing Listed building, nor will the proposals cause harm to the fabric of the host building or its setting. The proposed external fixings will bear no significant, or negative, impact on the character of the sites surroundings. Indeed, the proposals seek to enhance the external appearance of the application site, upkeeping the host building and subsequently improving the overall character of the building.

The proposed signage features antique brass / stainless steel lettering which will be carefully affixed to the fascia board for the purpose of wayfinding to the building entrance for No. 39. The signage is sympathetic to the historic character of the building and surrounding area given its simplistic and stylistic design.

Policy TC2 (Camden's centres and other shopping areas) identify town centre secondary frontages as a key location for shops and retail. The proposed external fixings will enhance the appearance of the host building, supporting the ongoing use of the site for commercial use. The proposals will not impact the function of the existing use, and simply seek to improve the appearance of the existing building entrance. Such improvements are not uncommon for prominent retail frontages, aiding in the vitality, maintenance and upkeep of the area.

Conclusion

This application seeks Planning Permission and Listed Building Consent for the replacement of the existing external fixings and the introduction of external lighting at 39 Earlham Street WC2H 9LT. The proposals constitute cosmetic works which will aid in the upkeep of the building.

The proposals are minor in nature, predominantly replacing, and enhancing, the existing external fixings of the host building. The introduction of up/down lighting is considered entirely appropriate to the sites commercial setting and is of a similar nature to those currently in use along Earlham Street. The proposed signage design and materials have been appropriately selected to enhance the historical features of the existing doorway and are sympathetic to the surrounding area.

The proposed development is deemed appropriate in its adherence to regional and local policy. We trust the information submitted to be sufficiently satisfactory to validate the application and we look forward to a swift and positive response. However, should you require further information or should you have any queries, please do not hesitate to contact us.

Yours faithfully

Tassia de Paula-Yarmohammadi

For and on behalf of
Rolfe Judd Planning Limited
05 January 2024