

London Borough of Camden
Development Management
Regeneration and Planning
5 Pancras Square
London
N1C 4AG

For the attention of Ms Colette Hatton

Dear Colette

25 Neal Street / 43 Earlham Street, London WC2H 9PR

Planning (Listed Buildings and Conservation Areas) Act 1990

Application for Listed Building Consent for internal alterations at basement, ground, and first floor associated with refurbishment of the existing retail unit.

Planning Portal Ref: PP-13292713

On behalf of the applicant, Alo Europe Limited, we write in support of an application for listed building consent for internal alterations at basement, ground, and first floor associated with refurbishment of the existing retail unit at 25 Neal Street / 43 Earlham Street, London, WC2H, 9PR.

In support of the application and for the Councils consideration, the following documents have been submitted electronically via the Planning Portal:

- / Application Forms – prepared by Rolfe Judd Planning
- / Site Location Plan – Prepared by RPA Group
- / Existing, Demolition and Proposed Drawings – Prepared by RPA Group
- / Photographic Schedule – Prepared by RPA Group
- / Design and Access Statement & Heritage Statement (this covering letter) – Prepared by Rolfe Judd Planning

Accordingly, no application fee is required as part of an application for listed building consent.

Site Description & Location

The application site lies within the authoritative bounds of the London Borough of Camden and comprises of basement, ground and first floors on the corner of Earlham Street and Neal Street. The 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, and forms part of the Seven Dials Conservation Area. The site has two statutory addresses; 43 Earlham Street and 25 Neal Street.

The surrounding area is categorised by a variety of residential and commercial uses, including Seven Dials market to the east, located c.30m away from the application site. Earlham Street, a cobbled pedestrian and cycle only street leading towards the historical Seven Dials historic monument, 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.

Neal Street is similarly commercial in nature, with a variety of retail shops, cafes and eateries at ground floor, generally with offices or residential uses above.

Covent Garden, the most proximal underground station to the site, lies approximately 200m southeast. The area has a highly accessible PTAL rating of 6b.

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 1973, 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, are similarly listed and form part of the site's heritage context:

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

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

There is extensive planning history relevant to this site, which has been collated into a table and attached as Appendix 1.

The most relevant applications of reference for this application relate to the three applications set out below which are currently being determined by the London Borough of Camden for external alterations, in association with the fit-out for the new tenant.

- / 2024/1827/A - *Installation of 3 no. fascia signs and 2 no. projecting signs (all internally illuminated).* Registered 15th May 2024.
- / 2024/1828/P - *Remove existing poor condition sashwork and glazing and install new sashwork and glazing.* Registered 15th May 2024.
- / 2024/1867/L - *Removal and replacement of sashwork and glazing. Relocate lamp to above entrance. Installation of 3 internally illuminated fascia signs and 2 internally illuminated projecting signs.* Registered 15th May 2024.

As noted, the site has previously been subject to internal and external alterations in support of its ongoing commercial use. In particular, listed building consent has been granted for internal refurbishment of the floors in 2004 (2003/3603/L), 2008 (2008/2994/L) and 2012 (2012/0900/L) which have sought varying levels of alterations and reconfiguration of the internal spaces. 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

Internal alterations are proposed across basement, ground and first floors in association with refurbishment of the existing commercial unit to accommodate a new retail tenant, Alo.

The proposed works require the soft strip out of modern additions associated with the previous tenant including careful removal of non-load bearing partitions, fixtures, furniture, equipment, HVAC units and associated mechanical servicing routes, lighting and security CCTV and associated wiring/conduits.

This will allow for the creation of new fitting rooms and back of house areas, and installation of new fixtures including lighting, HVAC supply, replacement AC units (internal), power, fire protection and security devices. All new elements will be carefully mounted to the existing fabric and do not require any structural interventions or mechanical fixings, to ensure these are easily reversible. The partitions will be attached to stud walls, and do not propose to physically alter the original fabric of the building.

The existing modern flooring at ground (currently concrete resin and timber) and first floor (currently timber) will be replaced with tile flooring in a terrazzo style (80cm x 60cm tiles) which will sit atop the historic flooring which is understood to be concrete at both levels. This will fully preserve the underlying flooring and can be easily reversible. The existing stone flooring at basement level will be retained.

It is proposed to replace the existing modern staircase (approved under ref. 2003/3603/L) with a new spiral staircase to better fit the aesthetic of the new tenant. The staircase will feature stone stairs with a solid white

plaster balustrade and metal handrail. A small section of the existing concrete flooring at first floor level (1.8 sqm) is required to be cut away to accommodate the new staircase. This area of flooring has been largely modified over the years, and it is noted that the staircase is not a historic feature in this location as this was first approved in 1996 via planning permission ref. 9570382.

It is emphasised that the proposed internal works are to ensure the suitability of the host building for the proposed end user, however such alterations are not deemed to be permanent and will not alter any historic fabric (with the exception of a small area of concrete flooring).

Please refer to the submitted drawing pack prepared by RPA Group for further details.

Access

The proposals pertain to minor internal alterations, such that no changes are proposed to the existing access arrangements for the building.

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)

Planning Considerations

The proposed works are considered supportive of national, strategic, and local planning policies as well as supplementary planning guidance as outlined below.

Paragraph 205 of the National Planning Policy Framework (NPPF) 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 208 of the NPPF states *'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'*.

Policy HC1 of the London Plan states that 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 also states that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Local Plan Policy D2 (Heritage) states that the Council will preserve and, where appropriate, enhance designated heritage assets and their settings, including conservation areas and listed buildings. Policy will seek to preserve or enhance the borough's listed buildings and resist proposals for alterations which would

cause harm to the special architectural and historic interest of the building. Regarding conservation areas, the policy requires that development within conservation areas preserve or, where possible, enhance the character or appearance of the area.

The proposals are for internal alterations only, and due consideration has been given to the existing historic fabric of the host building. It is understood that the interior of the building has been subject to various alterations in recent years, largely associated with the fit out for the current tenant, Diesel. The proposed interventions involve sensitively removing these modern additions, and installation of new non-structural partitions proposed to form new fitting rooms and back of house spaces which are required to support the ongoing operation of the unit as a retail shop. There will be no loss of a heritage asset, with these proposed alterations deemed non-structural. Any new fixings will utilise existing openings wherever possible, and where new fixings are required into existing walls or ceilings, these will be screwed into the existing mortar or modern partitions to minimise alterations to the existing fabric. Any exposed surfaces will be made good in materials that match the existing.

The new staircase is not considered to be contentious on heritage grounds as this will be replacing a modern staircase. The new sensitively designed spiral staircase reflects the building's historic use as a warehouse through the use of metal handrails and stone steps which will elevate the internal space. A small area of concrete flooring is required to be cut back at first floor level to accommodate the staircase, which has been largely modified in recent years and is therefore not considered to impact on the special architectural and historic interest of the building or the appreciation of the space as a historic warehouse.

The new flooring proposed at ground and first floors will not cause detriment to the current fabric and can be safely removed. There are no physical or structural works proposed to the existing materiality, with any alterations and refurbishments consisting of new fabric placed on top of the current fabric, preserving the Listed building through protective layering.

It is not considered that the internal proposals will impact the Listed status of the host building, nor the outlined designations applicable to the site. The proposed alterations will allow the viable use of the floors as a retail shop, and ensure the continued maintenance and safe usage of the building.

The internal alterations will safeguard the original building fabric through sensitive design measures and will not cause harm or substantial loss to the original fabric of the host building. In light of this, it is considered that the proposal accords with Local Plan Policy D2, London Plan Policy HC1 and the National Planning Policy Framework.

Conclusion

This application seeks Listed Building Consent for internal alterations associated with refurbishment of the existing retail unit at 25 Neal Street/43 Earlham Street, London, WC2H 9PR. No external works are proposed, and internal works will largely only alter modern existing features within the building which are not of any heritage value.

The proposed refurbishment will enable the future end user to adequately use the space as a retail store. The proposed replacement of the modern staircase and new flooring is deemed necessary to ensure the ongoing operation and protection of the host building.

In accordance with Local Plan policy, the proposed alterations will preserve the heritage asset and its original setting, and would not cause harm to any special architectural and historic interest of the building. All works are internal and therefore will not impact upon the established character or appearance of the Seven Dials (Covent Garden) Conservation Area.

We trust you will find the submitted information sufficient to validate our client's application and we look forward to a swift and positive outcome. Should you require any further details, please do not hesitate to contact the undersigned.

Yours faithfully

Ailish Collins

For and on behalf of
Rolfe Judd Planning Limited
31 July 2024

APPENDIX 1 - APPLICATION SITE HISTORY (SPLIT BY ALTERNATIVE ADDRESS)

Application Reference	Description of Development	Application Type	Decision	Decision Date
43 Earlham Street				
2023/2764/L	Installation of footfall counter to front elevation at first floor level for a period of 12 months	Listed Building Consent	Granted	01/11/2023
2012/0900/L	Internal alterations at basement, ground, and first floor associated with new internal shop fit-out in connection with existing retail unit (Class A1).	Listed Building Consent	Granted	23/04/2012
2012/0310/L	Installation of replacement windows and doors to Earlham Street, Neal Street and main entrance elevations.	Listed Building Consent	Granted	13/03/2012
2012/0143/P	Installation of replacement windows and doors to Earlham Street, Neal Street and main entrance elevations.	Full Planning Permission	Granted	13/03/2012
2008/2994/L	Internal refurbishment of basement, ground floor and first floor of existing retail shop (Class A1).	Listed Building Consent	Granted	29/09/2008
2008/1186/A	Display of two non-illuminated fascia signs at first floor level on Neal Street and Earlham Street elevations.	Advertisement Consent	Granted	16/06/2008
2008/1185/P	Replacement of windows and doors on ground floor elevation with powder coated aluminum framed doors and windows to retail shop unit Class A1.	Full Planning Permission	Granted	16/06/2008
2008/1184/L	External alterations in association with replacement windows and doors on ground floor elevations with powder coated aluminum framed doors and windows to retail shop unit Class A1 and works relating to display of signage.	Listed Building Consent	Granted	16/06/2008
2006/0405/L	Installation of 2x external air conditioning units to be housed in acoustic boxes and 3x internal air conditioning units at 1st floor level of the existing retail (A1) shop.	Listed Building Consent	Granted	31/03/2006
2004/0769/L	Installation of air conditioning unit to flat roof at rear first floor level in connection with existing shop.	Listed Building Consent	Granted	20/05/2004
2003/3603/L	Internal alterations to existing class A1 (retail) unit (including nos 17 and 18 Cucumber Alley) including refurbishment, replacement of the existing modern main staircase, new lighting, cleaning of brickwork, suspended rafts under existing air conditioning units and renewal of shopfitting elements involving new partitions and fixtures.	Listed Building Consent	Granted	07/04/2004
LSX0204548	Removal of internal walls to allow extension of ground floor space for retail unit at 43 Earlham Street, as shown on drawing numbers; 285/TN19/001 Rev A; 002 Rev A; 003 Rev A; 004 Rev A; 005 Rev A	Listed Building Consent	Granted	11/06/2022

LSX0005077	Alterations and refurbishment to second floor office. (as shown on drawing numbers; 285/TN10/109, 110, 111, 201).	Listed Building Consent	Granted	31/10/2000
PSX0004657	Change of use of the 2nd floor from Class B1 to dual use for office (Class B1) or showroom (Class A1) purposes, as shown by drawing numbers P1359/A4/01, 285/TN10/004, 285/TN10/005, 285/TN10/104 and 18 photos of existing interior.	Full Planning Permission	Granted	14/08/2000
LSX0004720	Removal of modern internal partition walls at second floor level in association with dual use for office (Class B1) or showroom (Class A1) purposes, as shown by drawing numbers P1359/A4/01, 285/TN10/004, 285/TN10/005, 285/TN10/104 and 18 photos of existing interior.	Listed Building Consent	Granted	14/08/2000
PSX0004568	The retention of the louvres on the existing window openings at first floor level in connection with the provision of air conditioning unit on the first floor, as shown by drawing numbers P1 Rev C, 2050/RD1, 2050/RD2, specifications of air conditioning condenser unit and noise acoustic report.	Full Planning Permission	Granted	09/10/2000
LSX0004295	The retention of the louvres on the existing window openings at first floor level in connection with the provision of air conditioning unit on the first floor, as shown by drawing numbers P1 Rev C, 2050/RD1, 2050/RD2, specifications of air conditioning condenser unit and noise acoustic report.	Listed Building Consent	Granted	09/10/2000
LS9905263	Internal alterations in association with retail refit at basement, ground and first floor level, as shown by drawing numbers 04, 07, 10, 10D Rev C, 13 Rev B, A0, A1, A2 Rev B, C2 Rev A, DS04/01, DS04/02, F0, F2, P1 Rev B, S1-T(P0), S1-T(P1), S2-T(PO), S2-T(P1), S3-T(PO), S3-T(P1), S3-T Rev B(P2), S4-T(PO) and S1-TB(P1).	Listed Building Consent	Granted	22/05/2000
9502072	Installation of a new shopfront as shown on plan numbers 7995/01, 02, 03, 04, 05, 06, 08.	Full Planning Permission	Granted	09/02/1996
9570382	Alterations including the installation of a new shopfront and signage and internal alterations to form a new staircase linking basement, ground and first floors.	Listed Building Consent	Granted	09/02/1996
9501024	Change of use of first floor from warehouse (Class B8) to retail use (Class A1) as shown on drawing numbers 7995/01 to /03.	Full Planning Permission	Granted	03/08/1995
9270085	Alteration of three windows removal of small internal floor section as shown on drawing number 01 amended by fax dated 14 July 1992.	Listed Building Consent	Granted	02/07/1992
9200414	Alteration of three windows removal of small internal floor section as shown on drawing number 01 amended by fax dated 14 July 1992.	Full Planning Permission	Granted	02/07/1992

HB2503	Construction of a ground floor mezzanine with a store below.	Listed Building Consent	Granted	17/10/1982
20833	External alteration to No. 43 Earlham Street, WC2.	Historic Planning Application	Granted	24/11/1975
25A Neal Street				
2010/0178/P	Change of use and works of conversion of second floor to flexible uses for either Class A1 (Shop) or Class B1 (Office) or Class C3 (Residential).	Full Planning Permission	Granted	17/05/2010
LSX0204312	Internal alterations to listed building comprising creation of a lobby and office enclosure on top floor, as shown on drawing numbers: CC - (001) - 01 Rev B, 03, 07, EXTG01.	Listed Building Consent	Granted	14/05/2002
25 Neal Street				
2024/1867/L	Removal and replacement of sashwork and glazing. Relocate lamp to above entrance. Installation of 3 internally illuminated fascia signs and 2 internally illuminated projecting signs.	Listed Building Consent	Pending	
2024/1828/P	Remove existing poor condition sashwork and glazing and install new sashwork and glazing	Full Planning Permission	Pending	
2024/1827/A	Installation of 3 no. fascia signs and 2 no. projecting signs (all internally illuminated)	Advertisement Consent	Pending	
2010/0194/L	Internal alterations associated with change of use and works of conversion of second floor to flexible uses for either Class A1 (Shop) or Class B1 (Office) or Class C3 (Residential).	Listed Building Consent	Granted	16/03/2010