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**Date: 22/09/2016**  
**Our ref: 2016/3548/PRE**  
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James Sheppard  
Henrietta House  
Henrietta Place  
London  
W1G 0NB  
*By email*

Dear James,

**Re: Seven Dials Warehouse, 44 - 56 Earlham Street, WC2H 9LA**

Thank you for submitting a pre-planning application enquiry for the above property which was received on 27/06/2016 together with the required fee of £960.00.

**1. Drawings and documents**

Pre-application document dated August 2016 - Updated, and Historic Building Report dated July 2016.

**2. Proposal**

Refurbishment of Seven Dials Warehouse, including:

- Improvements at street level to the windows/façade, main entrance and new signage;
- Interior refurbishments including reception area, stairwell and work to upper office floors; and
- Roof extension to create a 6<sup>th</sup> storey with roof terrace and plant space; or
- Creation of terrace at rooftop level.

**3. Site description**

The Seven Dials Warehouse is a Grade II-listed building located in the Seven Dials Conservation Area, within the Seven Dials character area.

The building was subject to significant fire damage in September 1999, which largely destroyed the building's structure from the third floor upwards. It was rebuilt internally from the third floor upwards with modern floors, columns, double-glazed windows and a flat roof. The building was subsequently listed in July 2002.

The building occupies a wedge-shaped site fronting Earlham Street, Neal Street and Shelton Street and was constructed in the mid-19th century as an extension to the former Coombe & Co brewery. The building has strong group value with the listed former brewery buildings to the south of Shelton Street, in the City of Westminster.

The surrounding area comprises a mix of retail, restaurant/café, theatre and commercial uses within 5-6 storey buildings of a similar nature to the application site.

#### 4. Relevant planning history

**PSX0004538** - Refurbishment, alteration and extensions following fire damage to provide a mix of offices, retail and community uses including the erection of a roof extension at fifth floor level and roof top plant and associated alterations at ground floor level and facades. Granted 17/04/2002.

**2003/0658/L** - Internal and external works of alteration including the removal of internal cladding, demolition of part of the mezzanine floor area, relocation of internal staircase, the replacement of secondary entrance with fully glazed shop window on Earlham Street frontage and the removal of paint to door surrounds, stone plinths and banding. Listed building consent granted 17/09/2003.

**2008/0059/L** - Internal works to office space including the installation of cellular demountable partitioning and the installation of new condenser units to the existing roof plant enclosure. Granted 09/06/2008.

**2008/5026/P & 2008/5102/L** - Installation of two condenser units at roof level on the south-east (Shelton Street) elevation of existing office (Class B1). Granted 24/12/2008.

#### 5. Relevant policies and guidance

##### [National Planning Policy Framework 2012](#)

##### [The London Plan March 2016](#)

##### [LDF Core Strategy](#)

CS1 Distribution of growth

CS2 Growth areas

CS3 Other highly accessible areas

CS4 Areas of more limited change

CS5 Managing the impact of growth and development

CS7 Promoting Camden's centres and shops

CS8 Promoting a successful and inclusive Camden economy

CS9 Achieving a successful Central London

CS11 Promoting sustainable and efficient travel

CS13 Tackling climate change through promoting higher environmental standards

CS14 Promoting high quality places and conserving our heritage

##### [LDF Development Policies](#)

DP1 Mixed use development  
 DP13 Employment sites and premises  
 DP16 The transport implications of development  
 DP17 Walking, cycling and public transport  
 DP18 Parking standards and limiting the availability of car parking  
 DP19 Managing the impact of parking  
 DP20 Movement of goods and materials  
 DP21 Development connecting to the highway network  
 DP22 Promoting sustainable design and construction  
 DP23 Water  
 DP24 Securing high quality design  
 DP25 Conserving Camden's heritage  
 DP26 Managing the impact of development on occupiers and neighbours  
 DP28 Noise and vibration  
 DP30 Shopfronts  
 DP32 Air quality and Camden's Clear Zone

#### [Camden Planning Guidance 2011/2015](#)

CPG1 Design 2015  
 CPG3 Sustainability 2015  
 CPG5 Town centres, retail and employment 2015  
 CPG6 Amenity 2011  
 CPG7 Transport 2011  
 CPG8 Planning Obligations 2015

#### [Seven Dials Estate Conservation Area Statement 1998.](#)

## **6. Assessment**

The principle issues for consideration are considered to be:

- Land use
- Design (impact of the proposal on the character and appearance of the host listed building, and wider Seven Dials Conservation Area)
- Soft strip works to listed building
- Amenity
- Transport
- Planning obligations

## **7. Land Use**

### Mixed Use

The proposed rooftop extension would result in an uplift of approximately 307sqm additional office floorspace and would therefore trigger Policies CS1 and DP1.

Policy CS1 (Distribution of Growth) promotes the most efficient use of land and buildings in Camden. This includes encouraging a mix of uses in development and expecting the provision of a mix of uses in schemes in the most accessible parts of the borough. It seeks to focus Camden's growth in the most suitable locations, specifically in highly accessible locations such as the Central London Area.

Policy DP1 sets out the Council's detailed approach to mixed use development and states that the Council will require a mix of uses in development where appropriate, including a contribution towards housing. In the central London area (except Hatton Garden), where development results in an uplift of more than 200 sqm (gross) additional floorspace, the Council will require up to 50% of all additional floorspace to be housing. In this case, the development would trigger the requirement for approximately 150sqm of the new floorspace to be new residential housing.

In considering whether a mix of uses should be sought, whether it can practically be achieved on site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account various considerations including: the character of the development, the site and the area; extent of the additional floorspace and constraints on including a mix of uses; and whether secondary uses would be incompatible with the character of the primary use.

If you do not have a suitable alternative site, a detailed assessment should be submitted demonstrating no other suitable sites within the ward (or adjoining wards) are capable of providing new residential accommodation/secondary uses, typically by way of a change of use. Should it be demonstrated to the Council's satisfaction that suitable secondary uses cannot be provided on site or that no alternative site is available in the area, we may accept a payment in lieu of provision, directly related in scale and kind to the development proposed.

Financial contributions will relate to the value of the land (or the value of the space above another development) needed to provide the secondary use elsewhere, having regard to the financial viability of the proposed development. Where a contribution to housing is sought under Policy DP1, CPG8 requires a payment of £700 per square metres multiplied by the on-site target for housing (in this case 50%). CPG8 (chapter 6) provides more detailed information regarding the calculation of off-site provision and payments in lieu.

#### Creation of additional office floor space

Policy CS8 (Promoting a Successful and Inclusive Camden Economy) seeks to ensure that the borough retains a strong economy. It seeks to do this by, amongst other things, safeguarding existing employment sites that meet the needs of modern industry and employers, and providing facilities for small and medium sized enterprises. Policy DP13 supports the delivery of the Core Strategy by ensuring that sufficient sites are retained to enable a variety of commercial and industrial business to find premises and continue to operate.

The increase in employment floorspace by 300 sqm is welcomed in this location and will aid the Council in supporting the local economy and meeting the demand for office floorspace. There is a particular demand for facilities for small and medium sized

enterprises. The development should consider the ability to provide for this by allowing flexibility within the proposed floor plates.

## 8. Design

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions to existing buildings are proposed. The following considerations contained within policies CS5, CS14 of the Core Strategy and policies DP24, DP25 and DP26 of the Development Policies Document are relevant to the application: development should consider the principle of the extension, the impacts of the development on the character, setting, context and the form and scale of neighbouring buildings, and the residential amenity impacts of the proposals.

Camden's Development Policies Document is supplemented by planning documents providing further detailed guidance, including CPG1 (Design) and the Seven Dials Estate Conservation Area Statement.

The pre-application enquiry concerns the following proposals:

- External alterations at street level
- Internal alterations including reorganisation of reception area, relocation of stair core at third floor level upwards
- Proposed roof extension/terrace/alterations to plant enclosure.

### External alterations at street level

The proposed paint removal is acceptable in principle; however a method statement should be submitted to ensure that the proposed method of paint removal does not result in harm to the historic brickwork below. A non-abrasive removal method should be specified, as abrasive techniques are highly likely to remove protective fireskins, which can lead to the softer inner parts of the bricks vulnerable to decay. Water-based methods can cause unsightly efflorescence (white deposits) or cause saturation / damp penetration. Chemical cleaning can sometimes produce satisfactory results, but inadequate washing off may cause staining. It is recommended that trials should be conducted and that the paint removal method should be carefully chosen in consultation with a specialist

The proposed replacement of non-original doors and windows with metal-framed windows and doors is acceptable in principle. While preference would be given to maintaining metal transoms and mullions to reflecting the building's industrial character, it is accepted that the proposed windows may be justified if similar examples of window and door units have been allowed recently in the immediate vicinity. Detailed elevation, plan and section drawings at a scale of 1:20 will be required to ensure the new window and door units are of an appropriate design to complement the listed building.

The proposed metal projecting signs are acceptable in principle, and are considered to be of an appropriate size and material; however the internal illumination should extend only to the lettering.

The appearance of the proposed large-scale painted lettering is of concern, and it is not clear from the submission documents whether there is an historic precedent for this type of signage. It is acknowledged that an example of similar-scale lettering at the Thomas Neal Centre has been included in the pre-application document, however it is not clear what date this lettering was applied.

### Internal alterations

Following the removal of plasterboard finishes, an assessment of the condition of internal faces of brickwork walls should be undertaken and included to support the listed building consent application. A method statement and schedule of any proposed brickwork repairs should be provided.

#### Ground / Mezzanine:

The following works proposed are considered to be acceptable, and not to result in harm to the special interest of the listed building:

- Removal of the raised modern floor structure and wheelchair lift to increase the reception
- Modification of the modern steel staircase to mezzanine level
- Removal of modern stud partition walls
- Installation of new partition walls to divide the reception / studio space areas
- Installation of cycle storage facilities with access from Shelton Street, including the modification of the existing steel staircase, the creation of new openings within modern blockwork walls and installation of partitions for drying room / showers and the installation of a new staircase to the lobby area beneath the existing cast iron beams

#### Further details required:

- Section drawing at 1:20 showing the layout of the new staircase with the existing cast iron beams and columns
- Section drawing at 1:20 showing how new partition walls at ground and mezzanine levels will integrate with cast iron columns (only required where partition walls are proposed adjacent to cast-iron columns)

#### Upper floors:

The relocation of the secondary means of escape stair from the third floor upwards to continue the existing secondary stair core at ground / first floor levels is acceptable, as well as the removal of internal modern partition walls.

### Proposed roof terrace

The proposed creation of a roof terrace on the existing flat roof is considered to be acceptable in design terms, subject to the glass balustrade being sufficiently set in from the parapet to ensure that it is not visible from street level and in long views.

#### Proposed roof extension

The Seven Dials Conservation Area Statement includes guidance on roof extensions. SD25 states that 'There are limited opportunities for roof extensions as alterations to the roofscape could adversely affect the character of the Conservation Area.'

The proposed roof extension at 6th floor level is likely to be visible in long views from Shelton Street and from Shelton Street facing east, and from other properties within the conservation area. The part of the existing 5th floor level set towards Neal Street is a glazed structure set behind the brick parapet, its design clearly reflecting that of a roof extension.

It is noted in the Historic Buildings Report submitted to support the proposals (p.9) that the rooftop plant enclosure at roof level detracts from the significance of the building, particularly in views from Langley Street. In this context, the erection of an additional storey, extending the height of the existing plant enclosure to cover the majority of the remaining flat roof, is not considered to be appropriate, as it would be highly likely to further detract from the significance of the building.

### **9. Soft strip works**

As part of the pre-application process, advice was also sought by the applicant regarding proposed soft strip works that can be undertaken to the building ahead of the receipt of listed building consent. Of the works proposed, it was confirmed via email that the removal of all modern lighting, cabling, furniture and furnishings, kitchen units and internal signage could be removed. It was agreed that modern timber veneer cladding within bathrooms at could be removed, as well as small sections of the modern floor and ceiling finishes (maximum of 1m<sup>2</sup> in size) to enable exploratory investigations. It was also agreed that plasterboard finishes could be removed from the walls at first floor level upwards to expose areas of brickwork for assessment, however metal studwork fixings attached to the brick walls, must be left in place and no brickwork repairs should be undertaken ahead of further details / agreed methodology to be established as part of the listed building consent process.

Works not agreed as part of the soft strip works noted above should be included within the submission of listed building consent.

### **10. Amenity**

Policy CS5 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. Policy DP26 supports this, by seeking to ensure that development protects the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of neighbouring residents. This includes privacy/overlooking, outlook and impact on daylight and sunlight.

### Daylight/Sunlight

Although the site is predominantly surrounded by commercial uses, there are residential dwellings opposite the site on Earham Street and Shelton Street. The council would expect any future planning application to demonstrate that the erection of an additional storey did not result in a harmful decrease in daylight levels reaching these properties, in line with BRE guidelines.

### Outlook

Although the proposal includes the erection of an additional storey, and consequently a larger visual addition than what currently exists, the new storey would be the same height as the existing plant enclosure and glass extension and would be set back away from the boundaries. This would help to limit the impact on neighbouring outlook, and it is not considered to increase their sense of enclosure.

### Overlooking

BRE guidelines and Camden Planning Guidance recommends distances of at least 18m between directly overlooking neighbouring windows. Although it is acknowledged that this is often unachievable in a central urban location, Policy DP26 still requires measures to be taken to ensure that the privacy of residential occupants is maintained.

The proposed roof extension and terrace would be set back from the side elevations by approximately 4m, leaving a distance of 15m from The Thomas Neal Centre to the north and 12m from the properties along Shelton Street to the south. Due to the higher level of the extension/terrace and the large set-back, the opportunity for overlooking into neighbouring buildings would be limited.

## **11. Transport**

Development Policy DP18 (Paragraphs 18.12 and 18.13) requires development to provide cycle parking facilities in accordance with the minimum requirements of our cycle parking standards and in accordance with the minimum requirements of the London Plan.

Cycle parking provision should be provided with convenient access to street level and must be secure and easy for everyone to use. In order to meet London Plan's minimum cycle parking requirement, the development must provide 1 long stay space per 90sqm and 1 short stay space per 500sqm. Therefore, the development would need to provide 4 long stay spaces and 1 short stay spaces.

The submitted drawings show 30 cycle parking spaces to provide parking for the whole building which is considered acceptable. However, although the parking is close to the Shelton Street entrance, the store is accessible via a staircase which would not comply with Camden's parking standards (see CPG7 – Transport). It is recommended that a ramp or a lift is installed to enable step-free access to the bike store.



Detailed information regarding the proposed stands has not been provided, but the Council recommends Sheffield style stands or Josta two-tier cycle parking as opposed to vertical parking systems which are not easily accessible.

### Construction Management Plan

It is important that effective measures are taken during construction works to ensure that damage is not caused to the host building, neighbouring buildings or the surrounding highways

Construction management plans will be required for schemes on constrained sites, in conservation areas, on sites adjacent to a listed building, or in other areas depending on the scale of the development and the conditions of the site.

A draft Construction Management Plan (CMP) would be required to be submitted with any application setting out how construction matters would be dealt with, for example deliveries, how material will be stored and construction waste removed from site etc.

A draft (based on the Camden pro-forma found online) should be submitted with the application, with the full CMP to be secured via S106 legal agreement.

It should be noted that in February 2016, Camden's Cabinet agreed to the introduction of a £60/hour formal charge to support the review and approval of submitted draft Construction Management Plans (CMPs) and verification of the operation of approved CMPs, to be secured as part of Section 106 agreements. The £60 hourly rate will allow the Council to set charges that address the specific impacts and issues of each development scheme.

However, indicative standard charges per development type are set out below to provide an indication of the levels of charges that can be expected:

<b>Construction/ Demolition Management Plans: Implementation Support Contribution: indicative charging rates</b>	
Small/ less complex (0-10 homes/ 0-1999sqm other uses)	<b>£1,140</b>
Medium size and complexity (10-50 homes, 2000-4999sqm other uses)	<b>£3,240</b>
Major and complex applications (50-499 homes/ 5,000-9,999sqm other uses)**	<b>£7,620</b>

The CMP Implementation Support Contribution will be used to fund the specific technical inputs and sign off that are required to ensure that the obligation is complied with and ensure that the planning objectives we are seeking to secure are actually achieved.

## **12. Planning obligations**

The proposal will likely be subject to the following planning obligations:

### Highways contributions

It is likely that highways contributions will be required to be secured via S106, to cover the cost of any public highways repairs necessary as a consequence of the proposed works.

### Construction Management Plan and monitoring fee

As discussed above.

#### **13. CIL**

This proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL as the additional floor space exceeds 100sqm.

#### **14. Conclusion**

The external street level alterations and refurbishment and internal alterations are likely to be supported at application stage. It is recommended that the roof terrace option is submitted rather than the creation of additional storey at roof level, which is unlikely to be supported by the Council.

#### **15. Planning application information**

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – full planning permission., listed building consent and advertisement consent
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:100 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:100 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:100 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:00 labelled 'existing' and 'proposed'
- Detailed elevation, plan and section drawings at a scale of 1:20 showing the new window and door units
- Section drawing at 1:20 showing the layout of the new staircase with the existing cast iron beams and columns
- Section drawing at 1:20 showing how new partition walls at ground and mezzanine levels will integrate with cast iron columns (only required where partition walls are proposed adjacent to cast-iron columns)
- Design and access statement
- Heritage statement
- Planning statement
- Paint removal method statement
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by letter, put up a notice on or near the site and,

advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document please do not hesitate to contact Laura Hazelton on the telephone number above.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Laura Hazelton

Planning Officer  
Planning Solutions Team