

RL/P7335
21 January 2019

Planning and Development
London Borough of Camden
2nd Floor, 5 Pancras Square
Town Hall, Judd Street
London
WC1H 9JE

Dear Sir / Madam

16-20 SHORTS GARDENS, SEVEN DIALS, LONDON, WC2 9AT

APPLICATION FOR LISTED BUILDING FOR INTERNAL ALTERATIONS AND REFURBISHMENT WORKS TO THE EXISTING OFFICE ACCOMMODATION AT 16-20 SHORTS GARDENS, COMPRISING THE FORMATION OF TWO OPENINGS BETWEEN INTERNAL WALLS AT FIRST AND SECOND FLOOR LEVELS TO LINK 16 SHORTS GARDENS AND 20 SHORTS GARDENS; REPLACEMENT INTERNAL ENTRANCES AT GROUND LEVEL; REPLACEMENT STAIRS AND LIFTS; AND REMOVAL OF EXISTING MODERN PLASTER FROM BRICK WALLS; AND GENERAL RECONFIGURATION OF EXISTING OFFICE LAYOUTS AT UPPER FLOOR LEVELS.

PLANNING PORTAL REF. PP-07569005

On behalf of our client, Shaftesbury Covent Garden Limited, we write in support of an application for listed building consent for various internal alterations and refurbishment works to the existing offices located at ground, first, second and third floor at 16-20 Shorts Gardens, Seven Dials.

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

- Application Forms - prepared by Rolfe Judd Planning
- Existing and Proposed Drawings – prepared by Garnett & Partners
- Design, Heritage and Access Statement – prepared by Garnett & Partners

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

Site Location and Description

This application relates to the ground, first, second and third floors of 16 and 20 Shorts Gardens and forms part of the wider building known collectively as Thomas Neal Centre. The properties comprise of office use (Class B1) on the upper floors, with a mixture of retail at ground floor and residential on the top floor of 20 Shorts Gardens. Access into the properties is from the ground floor of Shorts

London Borough of Camden
01 Feb 2019

Gardens.

The properties are recognised as being Grade II Listed, forming part of the wider Thomas Neal's Centre (previously known as the Craft Centre) and are located within Seven Dials (Covent Garden) Conservation Area. Historic England describes the building as follows:

"Includes: Nos.8-26 SHORT'S GARDENS. 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. INTERIOR: internal structure comprises brick barrel vaults supported by cast-iron columns. Nos 29-41 (odd) and Nos 8-26 (even) Shorts Gardens were listed on 10/03/88".

The Seven Dials (Covent Garden) Conservation Area Statement adds that:

"Short's Gardens has predominantly 19th century commercial buildings. The triangle bounded by Short's Gardens, Earlham Street and Neal Street was converted in 1992 to a shopping development known as Thomas Neal's. Entrances to the shops are mostly located internally to maintain the appearance of the original warehouse ground floor windows. The whole block is listed Grade II".

Whilst the building is recognised as being listed and contributing to the wider setting and character of the conservation area, it has become apparent through current and past investigation works that much of the internal fabric (and external on certain parts of the building) are non-original. Instead, much of the internal fabric has been removed and replaced with significant levels of engineering structure in the form of steels and concrete which related to the 1980's redevelopment scheme.

Please refer to the submitted Design, Heritage and Access Statement for further details and photos of the interior of the building.

Relevant Planning History

Having reviewed the Council's online planning database, a number of internal listed building works have been consented over the past 10-20 years, largely for the wholesale redevelopment of the existing building (Thomas Neal's Centre) and alterations to internal partition walls and associated minor external works.

Those recent consents deemed to be of relevance to this application are detailed below:

- On 5th June 2010, comprehensive works to the Thomas Neal's Centre were consented by the Council for "internal and external works in association with use of shopping mall including Class A1 shop units and former ancillary circulation space at basement and ground floor (including 80sq.m of additional floor space created by part infilling to atrium at ground floor) for Class A1 (retail) use, dual use of existing Class A3 kiosk for either Class A3 (café) use or Class A1 (retail) use, change of use of 18sq.m of Class A1 (retail) floor space to Class D1 (theatre use) and erection of solar panels to the inward facing roof slope adjacent to Shorts Gardens" (ref. 2010/2716/P and 2010/2742/L).

London Borough of Camden
01 Feb 2019

- On 31st October 2014, listed building consent was granted by the Council for “formation of opening between 16 and 20 Shorts Gardens at second floor level” (ref. 2014/5210/L).
- On 3rd May 2011, listed building consent was granted by the Council for internal alterations to the commercial premises at 16-20 Shorts Gardens to form a new door opening approximately 1200mm x 2200mm as a means of linking both buildings at first floor level” (ref. 2011/1059/L).
- On 9th November 1999, listed building consent was granted by the Council for the “formation link between 16 and 18 Shorts at first, second and third floor levels” (ref. LS9904949).
- On 9th January 1997, listed building consent was granted by the Council for “the removal of the internal staircase at first, second and third floor levels at 18 Shorts Gardens and the insertion of new doorways at the upper three levels to provide access from no 20 Shorts Gardens” (ref. LS9604246).
- On 13th August 1997, listed building consent and planning permission was granted for the “change of use of second floor and third floor from residential and office use to form 4 self-contained flats together with the erection of a conservatory and escape platform and steps at second floor, 18-20 Shorts Gardens” (ref. PS9704416R1 & LS9704417R1).
- On 16th February 1989, planning permission (ref. 8800273) was granted for “the refurbishment alteration, extension, and change of use to provide a mixed development comprising theatre, residential, retail, restaurant and business uses”. An associated listed building consent was also issued for works to the historic building (ref. 8870111).

As demonstrated by the above planning history, there have been many alterations within the properties including consents for multiple breakthroughs between 16-20 Shorts Gardens, most recently in 2011 and 2014. The Council’s recent officer reports acknowledges this, stating in 2011 and 2014 that:

2014: “The interior is much altered, with little original detail visible in this area, and the opening will not harm the special interest of the building, especially since the pronounced change in floor height will make evident the move from one building to the next”.

2011: “Doorways were approved at first, second and third floor levels to link the 2 properties in 1999. The addition of an extra doorway link is a minor incremental change which will not cause harm to the special interest of the building”.

We therefore consider the principle of linking the properties along Shorts Gardens has already been established and do not consider the further refurbishment of the existing office floors as being detrimental to the special interest of the building.

The Application Proposal

The existing building at 16-20 Shorts Gardens was converted in the late 1980s as part of the wider redevelopment of Thomas Neal’s Centre (2-26 Shorts Gardens and 29-41 Earham Street) to create a mix-use development comprising a theatre, residential, retail and office accommodation. The existing office entrances and upper office floors at 16-20 Shorts Garden have remained relatively

London Borough of Camden
01 Feb 2019

untouched since the original development and are therefore in need of modernisation.

As part of the proposals, appointed architects Garnett & Partners have considered the following refurbishment works to the internal parts of the building. These works can be summarised as follows:

- *Office Ground Floor Entrances*
 - The removal of existing 1980's MDF panelling, plasterboard and woodwork and replacement with contemporary fixtures and fittings (eg. heritage brick slips);
 - Upgrade and replacement of existing lift;
 - Repositioning of existing lift door (16 Shorts Gardens).

- *Office First, Second, Third Floor*
 - Internal refurbishment, including removal of existing stud partition walls and new toilet blocks and shower rooms;
 - Removal of existing non-original partitions, ceilings, finishes, fittings and raised floors.
 - Removal of selected areas of non-original plaster to expose original brickwork.
 - New internal opening created through original brickwork to provide internal link between 16 and 20 Shorts Gardens;
 - Installation of new 'exposed' MEP services as per the M&E services consultant engineers drawings.

- *Staircases*
 - Removal of existing timber balustrades (16 Shorts Gardens)
 - Installation of new metal balustrades and timber handrails (16 Shorts Gardens)
 - Alterations to existing newel posts
 - Removal of selected areas of non-original plaster plasterboard in order to expose original brickwork.
 - New plaster ceiling and pendant lights.

The proposals seek the sensitive strip back of the existing internal fabric to reveal as much of the original structure as possible and provide a new, functional office space for future tenants.

As demonstrated by the submitted Design, Heritage and Access Statement, the internal fabric of the building has been much altered as part of the 1980's refurbishment and little original fabric relating to the former warehouse buildings remain. This has been acknowledged as part of previous applications and site visits with officers. The only original fabric of the building which is proposed to be altered includes two new extended openings at first and second floor (which have already been subject to previous consented works).

Please refer to the submitted, Design Heritage and Access Statement and drawing pack for further detailed information.

Planning and Heritage Considerations

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

National Planning Policy Framework (NPPF) Paragraph 190 states that local planning authorities

London Borough of Camden
01 Feb 2019

should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence. In addition, they should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

NPPF Paragraph 192, states that the Council should in determining applications, take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses. In addition, Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

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.

The proposed works would seek the sensitive refurbishment of the existing office entrances and accommodation on the ground and upper floor at 16-20 Shorts Gardens. The majority of the works, as demonstrated in the Design Heritage and Access Statement, comprise of the removal and replacement of non-original 1980's fabric and is considered to be appropriate following an initial site visit by officers. In acknowledgement of those previous applications and completed assessments for internal works, officers concluded that the modern fixtures and fittings associated with the 1980's redevelopment held no special architectural or historic interest to the original grade listed building. Therefore, the removal of modern fixtures and fittings is not considered to harm the significant of the listed premises and support the requirements of both national and local policy.

In addition to the overall refurbishment of the building, the proposals include two break-throughs at first and second floor. The principal linking of the two properties has already been established under three separate applications reference numbers; LS9904949, 2011/1059/L and 2014/5210/L. The proposed break-through at first floor will utilise an existing opening that had previously been consented and subsequently blocked up. The break-through at second floor will create a new larger opening to provide a flexible working environment and office space for future tenants. All works to link 16 and 20 Shorts Gardens have been sensitively designed and will not have a detrimental impact on the quality or integrity of the listed buildings. The design includes the retention of small 'nibs' to the side of the walls, thereby allowing the layout and plan forms of the building to be recognised.

In accordance with Local Plan policy, the proposed alterations will preserve the heritage asset and its original setting (which is now, subsequent to the 1980's development, primarily related to the external appearance of the building) and would not cause harm to the 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.

As part of the proposed works, new services will be installed within the building utilising the existing modern voids and service ducts. In addition, new replacement plant will be located at roof level within the existing plant room. No new plant will be located outside of the current plant room and will provide for quieter, more efficient equipment. M&E consultants Quin Ross have provided indicative details and layouts of the proposed servicing strategy for the building. These details are included

London Borough of Camden
01 Feb 2019

within the submitted Design, Heritage and Access Statement.

Conclusion

This application seeks consent for the overall refurbishment of the existing office accommodation at 16-20 Shorts Gardens and creation of two internal break-through at first and second floor level. The proposed refurbishment and break-throughs would provide future tenants with a flexible and improved functional space. It is considered that the proposed breakthrough represents a minor alteration to the listed building and, given the extensive planning history for the site and previous internal alterations, will not impact upon the special character or historic fabric of the building.

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

Rupert Litherland

For and on behalf of
Rolfe Judd Planning Limited