

RL/8888  
07 March 2019

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

Dear Sir / Madam

**THOMAS NEALS WAREHOUSE, 35 EARLHAM STREET, LONDON, WC2H**

**APPLICATION FOR LISTED BUILDING CONSENT FOR MINOR INTERNAL WORKS RELATING TO THE INTERNAL REFURBISHMENT AND FIT-OUT OF THE EXISTING BASEMENT AND GROUND FLOOR.**

**PLANNING PORTAL REF. – PP-07684450**

On behalf of our client, Kerb Food Limited, we write in support of an application for listed building consent for the internal fit-out of the existing basement and ground floors of Thomas Neal's Warehouse (including Cucumber Alley), Seven Dials.

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

- Application Forms - prepared by Rolfe Judd Planning
- Site Location Plan – prepared by Stiff & Trevillion
- Existing and Proposed Drawings – prepared by Stiff & Trevillion
- Design, Heritage and Access Statement – prepared by Stiff & Trevillion

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

Site Location and Description

Thomas Neal's Warehouse (also known as Thomas Neal's Centre) is a former shopping arcade / mall located within a triangular block bounded by Earlham Street, Shorts Gardens and Neal Street. The building's basement and ground floors primarily comprises of retail (Class A1) and approx. 300sqm restaurant (Class A3) accommodation (as previously consented). The upper floors provide a mixture of residential and office accommodation, along with the Donmar Theatre accessed from Earlham Street.

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Thomas Neal's Warehouse was refurbished during the late 1980's and has recently completed an extensive modernisation and upgrade scheme. The former warehouse buildings are Grade II Listed and the site is located within the Seven Dial Conservation Area. Historic England describes the buildings as follows:

*"Warehouse, probably originally a brewery; now a crafts centre. Mid C19. Stock brick; roof not visible. 3 storeys. 19 bays to Earham 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 Earham Street elevation set in segmental headed reveals. INTERIOR: internal structure comprises brick barrel vaults supported by cast-iron columns".*

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, Earham 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 externally 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 structural works in the form of steels and concrete which related to the 1980's redevelopment scheme. It is however recognised that those parts of the original building which do remain in situ and are of significant value include the brick vaulted ceilings and cast iron columns. To clarify this application does not include any works to these important (and remaining) elements of the building.

Please refer to the submitted Design, Heritage and Access Statement for further details and photographs 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:

- In August 2016, an application for a non-material amendment was consented by the Council for "Use at basement and/or ground floor levels for restaurant use (Class A3) of no more than 300sqm floor space in total, and/or retail (Class A1); granted planning permission under reference 2013/0599/P dated 25/03/2013" (2016/3413/P)
- In July 2013, works were consented by the Council for the "Internal alterations including

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removal of partition walls at ground floor level". (ref. 2013/3579/L now implemented on site)

- In June 2010 (and further renewed in 2013), 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; and 2013/0599/P and 2013/0600/L now implemented on site).
- On 16<sup>th</sup> February 1989, planning permission was granted for "the refurbishment alteration, extension, and change of use to provide a mixed development comprising theatre, residential, retail, restaurant and business uses" (ref. 8800273). An associated listed building consent was also issued for works to the historic building including the "partial demolition and works of refurbishment alteration and extension" (ref. 8870111).

As demonstrated by the above planning history, there have been many alterations within the property over the recent years. Notably the internal fit-out which stripped out the most recent 1980's development to leave the original fabric of the building for an incoming tenant to fit-out. We therefore consider the principle fit-out of the premises is acceptable and do not consider the further refurbishment of the existing basement and ground floors to be detrimental to the 'special architectural interest of the building'.

#### The Application Proposal

The applicant, Kerb, have recently taken ownership of the existing basement and ground floor of Thomas Neal's Warehouse and seeks to complete a fit-out of the existing 'shell' following the recently completed refurbishment works by Shaftesbury PLC.

The proposed works are largely soft-fittings and fixtures with limited structural or intrusive alterations which may require works to the original fabric of the building. The majority of works, as described in the supporting design statement have been limited to simple fixings which can be easily removed without any damage to the existing fabric of the building (original or modern). Those areas of works which relate to the original parts of the building (vaulted ceilings or cast iron columns) have been completed in a sensitive and 'non-permanent manner'.

For clarity, all works are internal and can be best summarised as follows:

- *Basement Floor:*
  - Installing new services including electric power and lighting;
  - Internal unit / stall extraction using a recirculating system, general extract and supply air, drainage and water supplies to food units;
  - Toilets including forming new drain runs below ground;
  - Walls to the unit / stalls area and back of house;
  - Retention of existing paved and timber floors and to be refurbished where possible or replacing floors that have overlaid in timber and vinyl with ceramic flooring;
  - Installation of small lift pit (depth 400mm); and

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- Enlarging existing fire exit to the rear of basement for means of escape (as required by the Fire Consultant).
- *Ground Floor:*
  - Installing new services including electric power and lighting;
  - General extraction and installation of air, drainage and water supplies to each market stall (each to be installed with minimal impact on the building) and concealed where possible;
  - Erection of internal walls to the market area and creation of new free-standing stores / cafes and units;
  - Retention of existing paved and timber floors and to be refurbished where possible or replacing floors that have overlaid in timber and vinyl with ceramic flooring;
  - Installation of lift between the floors for servicing and disabled access; and
  - Installation of new staircase between the floors and balustrade to the existing light well.

The proposed works will further ensure that the building benefits from level access throughout and would be fully DDA compliant.

Please refer to the submitted existing and proposed internal drawings as prepared by architects Stiff & Trevillion.

#### Design, Heritage and Access Statement

Please refer to the submitted Design, Heritage and Access Statement which accompanies this application.

#### Planning Policy 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 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

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building.

The proposed works would seek the sensitive refurbishment and fit-out of the existing basement and ground floors of Thomas Neal's Warehouse following the letting of the floor space to the incoming tenant, Kerb. The fit-out follows the previous consented works which were implemented and completed by Shaftesbury in 2017.

The majority of the works, as demonstrated in the Design Heritage and Access Statement, comprises the installation of new seating area, market units / stalls and general back of house and servicing provisions (extraction, air, water and drainage). All works would be designed in such a way as to minimise the impact of the historic character with new joinery additions stopping short of brick soffits and existing within the existing structural grip and away from cast iron columns. Those identified features of historic merit, such as cast iron columns and brick vaults, will be enhanced and adapted with bespoke fixing solutions which wherever possible require no direct fixings. The works will seek to expose those original and modern features where possible to provide customers with a real sense of space and history of the building. Such works are considered appropriate following previous historic discussions with officers on site (relating to those previously consented works) and would be fully supportive of both local and national planning policies.

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 proposed internal fit-out with simple contemporary work-tops and finishes is not considered to harm the significant of the listed premises.

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.

New services will be installed within the building will utilise the existing modern voids and service ducts. New replacement plant will be located at roof level within the existing plant room. Indicative M&E service details and layouts of the proposed fit-out for the building are included within the Design, Heritage and Access Statement. As such, the proposed servicing requirements would not impact upon the identified historic interest of the building.

#### Conclusion

The proposal seeks the simple fit out of the existing basement and ground floors for the incoming tenant Kerb. The fit out will seek to give a new lease of life to this significant asset within the Seven Dials (currently vacant) and importantly would not, through its sensitive design by architects Stiff and Trevillion, impact upon the identified special architectural interest 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. However, should you require any further details, please do not hesitate to contact the undersigned.

Yours faithfully

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*Rupert Litherland*

For and on behalf of  
Rolfe Judd Planning Limited