Dear Adam,

The above is obviously quite a complicated application for a building of very high significance. Because of the detail I can't comment on all the various matters raised by this application but hopefully the conservation officer has already done so. The below are the main items that the committee and I have picked up on.

Worth noting that Camden and English Heritage did a very thorough report on 38 and 39 Great James Street in 1996 that gives some guidance on the historic features internally.

historicengland.org.uk 

External alterations

- We see no problem with removal of the c20 outrigger.
- Ditto on the new extension, the principle of this appears acceptable.
- Same on roof level access.
- Internal alterations generally seem ok, and so does detailed design, with the exception of the following:

Railings

- There are quite a lot of uniform boundary railings/screens and these may appear a bit unsympathetic and overbearing from neighbouring properties and the rear of the building. The terrace railings, at least at the front facade, should probably be set back further to prevent public visibility. A site visit and/or conversations with neighbouring occupiers might be quite useful, and the privacy screens may need to be set back further from the boundaries (which annoyingly aren't shown on the drawings). The appearance of the railings internally are a design question for the architect, I don't think it's worth a formal objection really.

Glass and Window Replacements

- HE guidance is quite clear on when windows/glass can be replaced in a listed building. The heritage consultant seems certain the boxes are ticked for all windows but this should be verified. Obviously the front facade has been replaced and most of the rear windows are non-original so this only applies to a handful of windows on the rear facade.

*Levelling works and new timber flooring (**objection**)*

- For a building of such high significance internally I think the general sanitisation of historic features should not be supported. Carpeting is obviously reversible (still regrettable) but I think the covering over with engineered timber and levelling up of historic floorboards should not be supported. It clearly obscures an important feature of historic, aesthetic, and evidential value. Levelling and covering of the floorboards should be no more supported, than say, squaring up and rendering over an old wonky timber frame building.

*Fireplace replacements (**objection**)*

- The English Heritage report notes the reeded fireplace surrounds to be c.1810 which makes sense from their appearance. These are an important historic feature and should not be removed to be 'modernised'. The proposed replacement fireplaces are not sympathetic or reproduction, they appear to be standard issue from Chesney's and the materiality especially is not appropriate. It would diminish the historic and architectural significance of the building.

*Opening up of ground floor principal rooms (**objection**)*

- I do not understand why these doors are being removed and historic panelling being altered/removed to widen the opening, nor what an 'arched opening' means in this context or why it is justified or how it would work with the panelling. Given the quite high significance of the internal joinery, panelling, etc in a principal room I would resist this.

- There is also the question of what happens to the historic floorboards in the areas where the walls are removed. Should cover-over timber flooring be approved, it would not be possible to subsequently remove it and reinstate the historic floorboards as there would be a 'gap' in the areas where the wall once stood.

Various mechanical and electrical comments

- There is quite a lot of M&E being proposed and the M&E plans are quite useful to look at. Apart from the joinery which is required to house the services (obscuring panelling, which is questionable), I suspect the roof-level ASHPs may actually be to provide active cooling. It doesn't make sense to have a LTHW system connected to one set of ASHPs on the lower ground floor providing hot water for heating, and then a separate pair of ASHPs on the roof ducted in refrigerant to provide hot air to the AHUs, *and* then a gas-powered backup system to the radiators should the basement ASHPs fail (but not the AHUs!). I think an M&E report is required to explain these things. From my experience on similar projects, double glazing + high efficiency rads on LTHW suffices for these buildings. High efficiency rads are not normally aesthetically acceptable in a listed building but as they are all concealed within joinery it should be ok. The additional hot air system should not be required for heating.

- The above is not an objection as such but it should be considered in whether all the internal joinery to house these units is really necessary.

Hopefully the above is helpful.

Owen Ward

For Bloomsbury CAAC