

Planning Statement

40 Great James Street, London, WC1N 3HB

Iceni Projects Limited on behalf of Ms Kay Georgiou

July 2015

Iceni ref. 15/089

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APPENDICES

A1. APPLICATION SUBMISSION DOCUMENTS

1. INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Ms Kay Georgiou (the 'applicant'), in support of a planning and listed building consent application for:

"Restoration of Grade II* listed building including; demolition of modern rear extension; demolition of kitchenette in rear courtyard area; creation of roof terrace on roof of 19th century extension; removal and replacement of staircases to the basement at front and rear lightwell of the building; addition of French doors in the west wall at basement level; retention and relaying of historic clay tiles to the outer slope area of the roof; removal of non-original partitions in vault area; demolition of non-original partition walls and finishes to first floor level; alterations to staircase balustrade at basement level; installation of underfloor heating system and channelling of cabling and switches within discrete chases behind architraves and dedicated compartments within new floor build up".

1.2 The application is submitted on behalf of the owner of the property, Ms Kay Georgiou. The objective of the scheme is to refurbish and restore the Grade II* listed building in a manner appropriate to its special interest and in order to secure its long term future.

This scheme is being undertaken on behalf of the new recent Freehold owner who would also be the end user for the building. The owner would use the offices as a place of work and to run their business from, and would also live in one of the residential flats.

- 1.3 The existing Grade II* listed building is currently in a very poor state of repair following years of under investment and neglect. 39 Great James Street, the neighbouring building, is currently on the Listed Buildings at Risk Register. These works are proposed to ensure that the building never reaches a stage where it is needed to be placed on the listed building at risk register.
- 1.4 Internal and external alterations are proposed to be made to the building.
- 1.5 The application proposals seek to:
 - Renovate and restore the Grade II* listed building in a manner appropriate to its significance and special interest;
 - Ensure the sustainability and future of the Grade II* listed building;
 - Address the structural issues affecting the Grade II* listed building:
 - Improve the overall practical utility of the building;
 - Create a well-designed mixed use building which has good practical utility and interaction between the office and residential uses;
 - Provide two residential units which better meet the needs of modern living;

- Maintain the residential mix of the building;
- Provide homes which better meet the needs of the lifetime home standards;
- Improve the layout and internal efficiency of the existing office space;
- Make the office space better able to meet the needs of modern office occupiers;
- Deliver high quality office (Class B1a) within the Central Activities Zone (CAZ);
- Improve the accessibility and internal layout of the building;
- Improve the thermal and energy efficiency of the building;
- Renew, revitalise and invest; and
- Improve the building.
- 1.6 The purpose of this statement is to identify and address the main planning issues associated with the proposed development, demonstrating how the proposal would be acceptable in the context of the Council's Statutory Development Plan policies and other material considerations.
- 1.7 This statement is structured as follows:
 - Section 2 describes the site and its surrounding area;
 - Section 3 outlines the planning history for the site;
 - Section 4 explains the pre-application discussions that have led to this submission;
 - Section 5 describes the proposed development;
 - Section 6 identifies the key planning policies relevant to the scheme;
 - Section 7 analyses the key planning considerations of the development proposals in the context of the above policies;
 - Section 8 provides an overview and conclusion.
- 1.8 Appendices to this statement comprise:
 - Appendix 1: Application Submission Documents

2. THE SITE AND SURROUNDING AREA

- 2.1 The application site is 40 Great James Street, London, WC1N 3HB. The site comprises a four storey (plus basement) Grade II* listed Georgian townhouse on the western side of Great James Street in the Bloomsbury Conservation Area. The building presents a four storey frontage to Great James Street, with the basement windows having access to light from a lightwell at street level.
- 2.2 Great James Street and the wider surrounding area is characterised by a mix of uses, given its central location in Bloomsbury. Great James Street has a mix of office and residential uses, while at the southern end is the junction with Theobalds Road, a busy thoroughfare which includes retail and other commercial uses. Holborn Library and Gray's Inn Gardens are located a short walk from the site on the northern and southern side of Theobalds Road, respectively.
- 2.3 According to Camden's Bloomsbury Conservation Area Appraisal (2011), the area is characterised by its historic built form, comprising townhouses built in long terraces with rear mews, creating a strong sense of enclosure by the terraces.
- 2.4 The building at no 40 is Grade II* listed, along with thirteen other buildings along the western side of Great James Street.
- 2.5 The building dates from the 1720s and includes modern extensions to the rear. These extensions result in the building abutting the site's western boundary at basement and ground floor levels. At subsequent upper floors, the building is set back from this boundary. A lightwell in the centre of the building ensures that natural light reaches the ground and basement levels. A cast iron staircase provides access from the street to the basement in the space created by this lightwell. Two vaults extend at basement level under Great James Street.
- 2.6 On the buildings eastern elevation, which fronts Great James Street, there are three sash windows at each storey, with a panelled front door in place of the far right window at ground floor level.
- 2.7 The rear of the building is enclosed due to the proximity of the other immediately surrounding properties. The rear elevation includes sash windows at each floor level on the west and north elevations, which are interrupted by the modern addition of W/Cs which protrude from the landings of ground and first floor level.
- 2.8 The building at no 40 Great James Street forms part of a larger Grade II* listing with nos. 26-37 and 39 to 40 (and their attached railings). The detail of this listing for no. 40 (which includes nos. 27-38) notes the 'good wood architraved doorcases with enriched, carved brackets carrying hoods with panelled soffits, most with patterned fanlights and panelled doors'.

- 40 Great James Street is a mixed use building comprising x 2 offices (Class B1a) and x 2 residential flats (Class C3). The building has been vacant for some time and is in a poor state of repair following years of under investment and neglect. The neighbouring building, No. 39 Great James Street is currently on the listed buildings at risk register held by Historic England. The condition of No. 40 Great James Street means that with no investment, it soon will join No. 39 Great James Street on the register.
- 2.10 No. 40 Great James Street has a PTAL rating of 6b indicating very good accessibility to public transport. The closest London Underground stations are Holborn located 643m to the southwest of the site and Russell Square located 700m to the northwest of the site.

Policy Designations/Allocations

- 2.11 As per the adopted Proposals Map (November 2010), which forms part of the London Borough of Camden's Core Strategy (2010), the site is subject to the following planning designations:
 - Central London Area (CLA);
 - Archaeological Priority Area;
 - Bloomsbury Conservation Area; and
 - Strategic viewing corridor (5A.2 Greenwich Park Wolfe statue to Tower Bridge Right Lateral Assessment Area).
- 2.12 The relevant planning policy issues relating to the above planning policy designations are addressed in section 7 of this statement.

3. PROPOSED DEVELOPMENT

3.1 Planning permission and listed building consent is sought for:

"Restoration of Grade II* listed building including; demolition of modern rear extension; demolition of kitchenette in rear courtyard area; creation of roof terrace on roof of 19th century extension; removal and replacement of staircases to the basement at front and rear lightwell of the building; addition of French doors in the west wall at basement level; retention and relaying of historic clay tiles to the outer slope area of the roof; removal of non-original partitions in vault area; demolition of non-original partition walls and finishes to first floor level; alterations to staircase balustrade at basement level; installation of underfloor heating system and channelling of cabling and switches within discrete chases behind architraves and dedicated compartments within new floor build up".

- 3.2 The proposed scheme would result in the complete demolition of the rear modern infill extension, restoration of the existing fabric of the listed building, creating a building fit for purpose in the 21st century.
- 3.3 The application proposals would:
 - Demolish the single storey modern infill extension to the rear of the listed building at ground floor level;
 - Remove the spiral staircase in the rear lightwell area at ground floor level;
 - Demolish the kitchenette unit located in the rear courtyard area;
 - Provide a terrace to the rear of the building for use by the offices;
 - Remove and replace the existing external staircase to the basement level within the front area;
 - Demolish non-original partition walls and features to create better, more original internal spaces;
 - Install new proposed service runs within the existing modern ceiling at basement level;
 - Redecorate and remove non-original partitions and finishes from rear vault;
 - Relocation of W/C fittings away from areas where historic panelling remains intact;
 - Retaining historic clay tiles to the inner slope area of the roof and relaying the outer slopes;
 - Installation of an underfloor heating system which will float over the top of existing floorboards, leaving the historic fabric intact. This will also contain cable runs and electrical sockets, removing interventions from the historic fabric:
 - Channelling of cabling and switches within discrete chases behind architraves;
 - · Renew, revitalise and invest; and
 - Improve the building.

4. PLANNING HISTORY

- 4.1 The electronic planning history records held by the London Borough of Camden have been inspected, as well as the records held by the Valuation Office Agency (VOA) in respect of council tax and business rates records.
- 4.2 There were no planning records on the electronic planning history register. This is confirmed in the pre-application advice letter received from Neil Collins at the London Borough of Camden.
- 4.3 The Council Tax and business rates records held by the VOA indicate that the residential units found on the second and third floor have been there since November 1995 and April 1993 respectively.
- 4.4 The VOA records also indicate that the offices found on ground and first floor have been there since at least April 2005.
- 4.5 As such, and based on the evidence, the lawful use of the building is office (Class B1a) and residential (Class C3).

5. PRE-APPLICATION CONSULTATION

- 5.1 The application proposals are the result of pre-application discussions held with planning officers at the London Borough of Camden.
- 5.2 A summary of the written response received from Neil Collins at the London Borough of Camden is outlined below.

Proposed Mix of Uses

Office (Class B1)

5.3 The London Borough of Camden had no objection in principle to the retention of the offices (Class B1a) on site.

Residential (Class C3)

5.4 The London Borough of Camden considered that the site was appropriate for residential development and that this was supported in principle.

Standard of Proposed Residential Accommodation

Outlook

- 5.5 The London Borough of Camden had concerns relating to the level of outlook that the proposed flat would offer its future occupants. They considered that this could be improved by providing better quality external areas.
- 5.6 The scheme now proposes to retain the flats on the second and third floors.

Light

- 5.7 The London Borough of Camden:
 - Had concerns with regard to the levels of natural daylight & sunlight that would penetrate into the basement;
 - Suggested that light levels in the basement be adequately tested in any future planning application.
- 5.8 The scheme now proposes to retain the basement for office (Class B1a) use.

Lifetime Homes

5.9 The London Borough of Camden considered that it would not be possible to alter the listed building to such a point to make it fully compliant with lifetime homes standards. However, the Council

suggested that any future application should fully explore non-invasive options for accessibility to residential floor space.

5.10 The flats have where possible been made compliant with lifetime homes standards.

Works to the Listed Building

Ground Floor

- 5.11 The London Borough of Camden:
 - Considered that the repairs and installation of new services were acceptable in principle;
 - Recommended the retention of the mid/late 19th Century single storey extension to the closet wing;
 - Had no objection to the installation of W/C facilities within the closet wing at all levels, subject to the fittings being away from any panelling;
 - Welcomed the removal of the infill extension at the rear and the spiral staircase which date from the early to mid-20th century.

First, Second and Third Floors

- 5.12 The London Borough of Camden:
 - · Accepted in principle, the proposed repairs and installation of new services; and
 - Welcomed the removal of the later partition within the front room at first floor level;

Roof

- 5.13 The London Borough of Camden considered that the M shaped roof form was still evident. It was considered to be of high significance and should therefore be retained. The Council considered that the existing tiles to the inner slopes of the M roof were also considered to be of significance and should be reinstated if the external coverings of the roof were to be renewed.
- 5.14 The proposed scheme seeks to repair and restore the roof to its original standard. The original tiles are to be retained and relocated to the outer slopes to improve the appearance and character of the listed building. The inner slopes are to be re-laid with new tiles carefully sourced to match the existing.

General

- 5.15 The London Borough of Camden:
 - Considered the use of floor mounted service boxes and surface mounted conduits acceptable only where the panelled portioning does not allow for discrete installation or chasing in;
 - Considered that the use of areas of floating flooring may be considered acceptable where the floor dips significantly;

- Considered that replacements for windows should be single glazed multi-paned sliding sashes;
- Considered that installation of 6 over 6 pane sashes would likely be acceptable, depending on their detailed design, section sizes and installation within rebated reveals;

Impact upon Neighbouring Occupants

- 5.16 The London Borough of Camden considered that there was no identified impact upon the adjacent property comprising an upper floor flat. The Council also considered that the design of the proposed rear elevated terrace would need to ensure that the privacy of existing occupiers would be protected.
- 5.17 The proposed scheme seeks to screen the terrace from neighbouring properties.

Transport

- 5.18 The London Borough of Camden:
 - Recommended that the proposed development be car free;
 - Recommended 1 cycle space be provided per flat in any future planning application submission.

6. PLANNING POLICY FRAMEWORK

6.1 This section provides an overview of the Development Plan and guidance relevant to the consideration of the proposal.

Policy Framework

- 6.2 Planning policy operates at three levels.
- At the national level, Central Government produces guidance in the form of the National Planning Policy Framework (NPPF).
- At the regional level, the Mayor's London Plan (2011) and Further Alterations to the London Plan (FALP) 2015, is the Regional Spatial Strategy (RSS) for London.
- 6.5 Planning policy at the local level is contained within policies of the adopted London Borough of Camden Core Strategy (2010) and the adopted London Borough of Camden Development Management Policies (2010).

The Development Plan

- 6.6 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 6.7 The statutory Development Plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004) is the adopted London Borough of Camden Core Strategy (2010), the adopted London Borough of Camden Development Polices (2010) and the London Plan and associated alterations.

Emerging Policy

- 6.8 The London Borough of Camden are in the process of adopting a New Local Plan which will replace the Core Strategy and Development Management Polices Document. The New Local Plan is currently at Preferred Options stage, the last consultation closed on 17 April 2015. The New Local Plan is due to be adopted in 2016.
- 6.9 The NPPF states that due weight should be given to relevant policies in existing plans according to their degree of consistency with NPPF policies: the closer the policies in the plan to the policies in

the Framework, the greater the weight that may be given. The New Local Plan is at the earliest stages of preparation and has no material weight at this time.

Listed Building and Conservation Areas Act

6.10 Given the building is a Grade II* listed building and its location within the Bloomsbury Conservation Area, it is necessary to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area as required by Section 72 (1) of the Planning (Listed Building and Conservation Areas) Act 1990 and the architectural and special interest of the listed building as required by Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990.

Policy Review

6.11 Rather than list all strategic and local policies here, we have instead dealt with them all on a section /topic basis in the following sections of this Planning Statement alongside the analysis / consideration of the relevant planning issues.

7. PRINCIPAL PLANNING CONSIDERATIONS

Land Use

- 7.1 The existing building is currently vacant and in a very poor state of repair and as a result, the office and residential units cannot be occupied and used.
- 7.2 The building was in lawful residential (Class C3) use and office (Class B1a) use until late 2014. The basement, ground and first floors comprise office space and the second and third floors comprise two separate self-contained residential units.
- 7.3 Table 7.1 below shows the land use layout of the existing floor levels which are not proposed to be changed.

Table 7.1 Existing and Proposed Land Uses by Floor

Floor	Land Use
Third	Residential (Class C3)
Second	Residential (Class C3)
First	Office (Class B1a)
Ground	Office (Class B1a)
Basement	Office (Class B1a)

- 7.4 The scheme proposes the demolition of the rear modern infill extension along with internal alterations to all floors of the building. As such, there is a marginal loss of gross office (Class B1a) floor area.
- 7.5 Table 7.2 below shows the existing vs proposed changes to the floor area by land use.

Table 7.2 Existing vs Proposed Land Use Change

Land Use	As Existing (GIA) Sq.m	As Proposed (GIA) Sq.m	Net Change (GIA) Sq.m
Residential (Class C3)	134	134	0
Office (Class B1a)	230.2	215.5	-14.7
TOTAL	364.2	349.5	-14.7

7.6 The current land uses above are confirmed by council tax records and business rates records held by the Valuation Office Agency (VOA). The Council Tax records date back to 1993 and the business

rates records to 2010. As such the VOA records confirm that the lawful land use of the building is as described in Table 7.1.

Offices

- 7.7 The existing office accommodation comprises x 2 offices and are located on the basement, ground and first floors. It is in a very poor state of repair including damage from water leaks and danger to health from asbestos.
- 7.8 The layout of the offices is also not conducive to the needs of a modern office (Class B1a) tenant. Their layout and practical utility are inefficient, for example the internal layout of the offices mean that it is difficult to create an optimum and efficient layout for desks. The layout of the office space also means that there are not enough power sockets for computers and phones. It is clear that the offices in their current state are sub-standard and do not meet the high standards expected for office space found within the CAZ.
- 7.9 Whilst there would be a marginal loss in gross office floor space, this would be outweighed by the improvements to be made to the listed building and the better quality office space that would result from the proposal.
- 7.10 The objectives in renovating the office space are:
 - Create a better and more usable space for modern office (Class B1a) occupiers;
 - Create a safe environment by removing the asbestos from the building;
 - Create offices with better daylight and sunlight levels; and
 - Ensure that the office meets the needs of the modern office (Class B1a) occupier by ensuring
 that the practical utility of the offices is as efficient as it possibly can be, allowing for enough
 power sockets for computers and phones as well as allowing for an efficient layout of desk space.
- 7.11 The resultant scheme would create offices which are fit for purpose in the 21st century and are at a standard expected by office (Class B1a) users of offices within the CAZ.

Residential

- 7.12 The x 2 residential flats are located on the second and third floor of the building. These flats are also in a poor state of repair with water damage and danger to health from asbestos. The flats currently have a poor internal layout and practical utility which means that members of the community with prohibitive physical disabilities would not be able to use them as well as an able bodied person.
- 7.13 The residential flats are also poorly insulated leading to poor thermal efficiency of the flats and thus high costs and use of energy to heat them during the winter.

- 7.14 Therefore the objectives in renovating the residential flats is to:
 - Create a better internal layout and practical utility that can be enjoyed by more members of the community and go some way to meeting lifetime home standards;
 - Create homes which have a better thermal efficiency and are therefore less intensive in their energy use; and
 - Maintain levels of daylight and sunlight.
- 7.15 The flats that would result as part of the scheme would have a better internal layout which would meet the guidance as set out in the Mayor's Housing SPG (2012) and would be suitable accommodation fit for the 21st Century.
- 7.16 Given the above, the proposed scheme is considered acceptable in accordance with the Development Plan.

Housing Mix

- 7.17 The NPPF considers that a key characteristic of a mixed community is a variety of housing, particularly in terms of tenure, price and a mix of different households.
- 7.18 The London Plan requires the London Borough of Camden and other boroughs to identify the full range of housing needs within their area.
- 7.19 Policy DP2 (Making Full Use of Camden's Capacity for Housing) states that the Council will seek to minimise the loss of housing in the borough and will seek to maximise the supply of additional homes in the borough.
- 7.20 Policy DP5 (Homes of Different Sizes) states that the Council expects developments to provide a mix of large and small homes in all residential developments and in considering the mix of dwelling sizes appropriate to the development, will have regard to the different dwelling sizes, priorities for social rented, intermediate affordable and market homes and will seek to ensure that all residential developments contribute to meeting the priorities set out in the Dwelling Size Priorities Table.
- 7.21 The proposed scheme would retain the residential units. The two 1-bed residential homes would be retained on the second, third and fourth floor levels. The dwelling mix for the property would therefore be maintained as existing. There would be no loss in the number of residential units on site.
- 7.22 Given the above, the proposed scheme would fully comply with Policies DP2 and DP5 of the Camden Development Management Policies as well as Policy CS6 (Providing Quality Homes) of the Camden Core Strategy and would also be compatible with the London Plan and Mayor's Housing SPG (2012).

Neighbouring Amenity

- 7.23 Policy DP26 (Managing the Impact of Development on Occupiers and Neighbours) states that the Council will only grant permission for development that does not cause harm to amenity. In taking that decision the Council will consider visual privacy, overlooking, overshadowing and outlook.
- 7.24 The changes that are proposed to the building would not result in overlooking or overshadowing of neighbouring properties or of the existing residential units as there are no extensions. New windows are proposed to be placed in the rear of the building, however these would be in locations where windows would have originally been placed.
- 7.25 Considering the above, the proposed scheme would not cause harm to residential amenity and as such would comply with Policy DP26 of the Camden Development Management Policies Document.

Quality and Space Standards

- 7.26 Both of the proposed residential units would meet or exceed the floorspace standards as set out in the Mayor's Housing SPG (2012) published by the Mayor of London.
- 7.27 Given the constrained nature of the site and the special interest of the listed building, no external residential amenity space has been proposed for the residential units. This maintains the situation currently found on site.
- 7.28 Daylight and sunlight levels to the flats will remain as existing.
- 7.29 Given the above, the proposed scheme complies with Policy DP26 of the Camden Development Management Policies Document (2010).

Design & Access

- 7.30 Policy DP24 (Securing High Quality Design) requires that all developments including alteration and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:
 - Character, setting, context and the form and scale of the neighbouring buildings;
 - The character and proportions of the existing building, where alterations and extensions are proposed;
 - The quality of materials to be used;
 - The provision of appropriate amenity space; and

- Accessibility.
- 7.31 The proposed scheme would not add any bulk or scale to the listed building. The proposed changes seek to restore and refurbish the listed building, enhancing its character, setting and context. The proposed scheme would result in a Grade II* listed building being enhanced by having key architectural features such as original room sizes and plan forms restored as well as external alternations to the rear which would result in the original architectural design of the building being restored, enhanced and emphasised.
- 7.32 No height is proposed to be added to the building and as such, the scheme would not have any impact on the strategic viewing corridor (5A.2 Greenwich Park Wolfe statue to Tower Bridge Right Lateral Assessment Area).
- 7.33 Accessibility would also be improved as part of the proposed scheme. Whilst there are limitations due to the age and design of the building and its listing, all possible efforts have been made to improve the accessibility of the offices and residential flats. To this end (where possible), the layouts of all the floors have been opened up to improve the accessibility of the offices and flats for people with physical disabilities. This has been done by removing non-original partition walls as well as carful design of room layouts. Where possible, the design has tried to meet lifetime homes standards.
- 7.34 The proposed changes would enhance the character, context and setting of the listed building and surrounding conservation area. The design changes would result in the internal layout of the building becoming more open and accessible to more members of the community. As such, it is considered that the proposed design changes comply with Policy DP24 (Securing High Quality Design).

Conservation & Heritage

- 7.35 The character, special interest and design of the building as well as the overall design character of the Bloomsbury Conservation Area has been carefully considered in the development of the proposed scheme.
- 7.36 A comprehensive Heritage Statement and Impact Assessment, prepared by Purcell, which assesses the heritage impacts of the proposed scheme and accompanies this planning application.

Conservation Area

- 7.37 Section 72(1) of the 1990 Act requires that developments within should preserve or enhance the character and appearance of the conservation area.
- 7.38 The Bloomsbury Conservation Area Appraisal (2011) describes Bloomsbury as an internationally significant example of town planning, explaining that the original street layouts, which employed the

concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area.

- 7.39 Policy DP25 (Conserving Camden's Heritage) of the Camden Development Management Policies states that in order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management plans and only permit development within conservation areas that preserve or enhance the character and appearance of the conservation area.
- 7.40 The exterior changes of the proposed scheme are focused to the rear of the property. The most significant proposal is to demolish the modern 20th century rear extension and to create a terrace in its place.
- 7.41 The alterations proposed to the rear of the building would not be visible from any public view within the conservation area and in any case would be considered an improvement as it would restore the listed building.
- 7.42 Given the above, the proposed scheme would make a positive contribution to the Bloomsbury Conservation area and as such complies with Policy DP25 (Conserving Camden's Heritage) as well as the statutory provisions of the Act.

Listed Building

- 7.43 Section 16 of the Act which states that in the granting of listed building consent, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses and ensure the benefit of the building and of all persons for the time being interested in it.
- 7.44 Policy DP25 (Conserving Camden's Heritage) of the Camden Development Management Policies states that to preserve or enhance the borough's listed buildings, the Council will prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown to outweigh the case for retention.
- 7.45 The scheme proposes a number of internal and external changes to the building.

Internal Changes

- 7.46 The internal changes proposed to the building include:
 - Alterations to the modern handrail and balustrade of the current staircase to the basement;
 - Creation of a large filing room within the basement by demolishing three modern inserted walls and unlocking an existing opening within the vaulted rooms;

- Creation of a kitchenette and accessible W/C at ground floor level;
- Removal of non-original partition walls at first floor level;
- Removal of non-original cupboards either side of the fire place at second floor level;
- Insertion of new partition wall at second floor level to create a small W/C; and
- Refurbishment of staircase to attic.
- 7.47 The current staircase to the basement is a modern addition and therefore has no heritage value. As such, the alterations to the staircase would therefore not have a negative impact upon the historic value of the house. The alterations to the staircase that would be installed would be sensitively designed to take account of the design features and forms which make the listed building significant. The alterations to the staircase would also be a considerable improvement in terms of quality and safety. The internal basement floor plan would be retained.
- 7.48 A large filing room would be created within the vaults by demolishing three modern inserted walls and unlocking an existing opening in the vaulted rooms of the basement. These alterations would have the benefit of reinstating a historic passage through the vaults.
- 7.49 The scheme proposes the creation of a kitchenette and accessible W/C at ground floor level. These works would involve the rehanging of the door and inserting of new partitions along with new sanitary ware. Whilst these alterations would affect the planform of the room, it is considered that the room is not part of the original building and therefore is of lower significance. In any case, the proposed changes would be easily reversible.
- 7.50 At first floor level, it is proposed to remove the partition that currently sub-divides the principal room of the house. The partition is a non-original addition and its removal will result in the restoration of the space back to its original configuration which would be beneficial to the character of the room.
- 7.51 The non-original partition that sub-divides rooms 1/02 and 1/03 is considered to be of low significance and would be removed and replaced with a new partition which would be placed further west, in line with the window on the north facing wall. This revised room layout is to accommodate a W/C. The revised layout would allow the original proportions of the room to be recognised through the inclusion of glazing at the head to maintain sight lines of the cornice. It would also be reversible.
- 7.52 The scheme proposes the removal of the cupboards either side if the fireplace in room 2/01. These cupboards are 19th century additions, and whilst part of the historic development of the building, their presence is considered to impact on the historic character of the room which takes primary importance, and their removal would return the space back to its original form and restore the character of the building.

- 7.53 The scheme proposes a partition wall to be introduced into room 2/03 in order to create a small W/C next to the kitchenette. Although this room would be subdivided, the new partition wall would be reversible and would replace an intrusive modern bathtub and sink that currently occupy the space.
- 7.54 The existing stair to the attic would be refurbished. The current stair is modern and refurbishment would not result in the loss of historic fabric or character.

External Changes

- 7.55 The external changes proposed to the building are:
 - Demolition of existing modern single storey rear extension;
 - Creation of a terrace on top of the one storey 19th century section of building;
 - Removal of cast iron spiral staircase in the light well at the rear of the building;
 - Improving access to the rear light-well by removing non-original fabric (the cill to the existing window is concrete with modern brickwork below) by dropping the cill of the window that is in the west wall of room B/04 and inserting new French doors;
 - Removal of existing steel staircase to basement at the front of the building and replacement with a new steel stair that would take up the full width of the area;
 - Demolition of two W/Cs that extend out from the west elevation and reinstatement of windows at these levels;
 - Installation of new metal gate at street level to replace the existing modern example that is unsympathetic to the historic character of the railings.
 - Careful repairs to the roof to match its existing appearance; and
 - Replacement of modern existing windows with new that are more historically appropriate.
- 7.56 The rear modern extension of the building was added in the 20th century. It is considered that this extension detracts from the architectural significance and special interest of the listed building and as such its removal has been welcomed by the Council in their pre-application advice letter. In its place a terrace would be created. This would have a feature stair in the north west corner of the site to the first floor terrace.
- 7.57 The modern extension is intrusive and of no heritage significance. Its removal and the creation of the terrace would be beneficial to the aesthetic value of the rear of the site.
- 7.58 A further terrace would be created on top of the 19th century section of the building and would be enclosed with a timber screen. The 19th century section of the building does not form part of the original building and as such the proposal would not have an adverse impact on the fabric or aesthetic value. The terrace would have a minimal impact on the setting and combined with improvements to the rear of the site would not have an adverse effect.

- 7.59 The removal of the cast iron staircase in the rear lightwell would not result in the loss of any historic fabric as the staircase was a later addition.
- 7.60 Access to the rear basement area is proposed to be improved by dropping the cill of the window in the west wall of room B/04 and inserting new French doors. Whilst the dropping of the cill will have an impact on the historic fabric and affect the pattern of the elevation, studies on site have revealed that the window cill is concreate and that the panel of brickwork below is modern, indicating that there may have been a door opening in this location. In any case, the window is at basement level and to the rear of the building and as such is less visible and does not contribute to the character and appearance of the conservation area.
- 7.61 A new steel staircase is proposed to be installed at the front of the building, providing access to the basement. The new staircase would take up the full width of the area and replace a modern steel staircase which is of no historic value. The replacement staircase would be of high quality and as such would not have an adverse impact on the aesthetic value of the building.
- 7.62 Two W/Cs that extend from the west elevation at the rear of the property are to be demolished and the windows at the landings to the main staircase are to be reinstated. These closets are later additions that detract from the façade at the rear of the building. Their removal and the reinstatement of windows will return the elevation to its original pattern and be beneficial to the aesthetic value of the internal spaces.
- 7.63 A new metal gate is proposed, which would provide access from the street to the new steel stair in the area. The railings and gate play an important part in the historical and aesthetic significance of No. 40 Great James Street. The proposed new metal gate would be a significant improvement on the existing gate which is an unsympathetic modern intervention.
- 7.64 The roof would be carefully repaired to match its existing appearance. The roof structure would be repaired where required to match the existing fabric and a new membrane is proposed to be laid under the battens. The existing tiles would be retained and re-laid with any replacements to be carefully sourced to match the original in terms of materials, texture and colour.
- 7.65 New stone copings would replace existing concrete along the front of the roofline, with new lead gutter linings introduced and new pointing applied to the soldier course along the rear roofline.
- 7.66 These repairs would be sympathetic to the historic fabric of the building, make good the roof and in the case of replacing concreate, be beneficial to the roof area.
- 7.67 Existing modern windows throughout are to be replaced with new ones that are to be more historically appropriate, with the correct configuration of panes and glazing bars to the correct size and cross-

section. This would restore the original appearance of the individual buildings and also the wider streetscape.

7.68 The proposed scheme would enhance the architectural and special interest of the listed building as well as enhance the character and appearance of the Bloomsbury Conservation Area. The scheme would therefore comply with Policy D25 of the Camden Development Management Policies Document and legislation found within the 1990 Act.

Sustainability & Energy

- 7.69 The Mayor's vision in the London Plan is to ensure London becomes an exemplary, sustainable world city whilst allowing London to grow in a responsible and considered socio-economic manner.
- 7.70 The Mayor's SPG on Sustainable Design and Construction provides the context for all developments and provides a mechanism for addressing climate change impacts through new developments. The SPG provides guidance on the way that the seven measures identified in Policy 4B.6 can be implemented to meet the London Plan objectives.
- 7.71 Policy DP22 (Promoting Sustainable Design and Construction) requires development to incorporate sustainable design and construction measures. The policy further states that the Council will expect developments 500 sq.m to achieve "very good" in BREEAM assessments.
- 7.72 The proposed scheme seeks to improve the thermal and energy efficiency of the building by improving the insulation of the building among other measures. However, given the age of the building, the fact that it is listed and the materials and building methods used to construct the building mean that there is limited scope to improving the sustainable credentials of the building. All possible measures have been taken to improve the thermal and energy efficiency of the building.
- 7.73 Mindful of the above, the proposed scheme complies with the criteria set out in Policy DP22 of the Development Management Policies Document.

Archaeology

- 7.74 Policy DP25 (Conserving Camden's Heritage) requires the Council to protect remains of archaeological importance by ensuring that acceptable measures are taken to preserve them and their setting, including physical preservation where appropriate.
- 7.75 The site is located within an Archaeological Priority Area. The basement and vaults located under No.40 Great James Street make it unlikely that any archaeological remains of activity on the site before the construction of the building would remain, considering the level of disturbance of the ground. In any case, future proposed works would not involve excavation works.

7.76 Given the above, the scheme complies with Policy DP25 in relation to archaeological preservation.

Waste & Recycling

- 7.77 Each of the residential (Class C3) units would have designated areas to accommodate waste and recycling. These areas are within the kitchen area of each unit.
- 7.78 Waste and recycling would be stored in the kitchen area of each unit located within the development and would then be placed on the street up to 1 hour before waste and recycling would be collected.
- 7.79 Residential waste is collected from Great James Street six times per week on Monday, Tuesday Wednesday, Friday, Saturday and Sunday. Recycling is collected from the site once a week on a Tuesday.
- 7.80 The proposed waste and recycling arrangements are considered to be in compliance with Development Management Policy DP26 (Managing the Impact of Development on Occupiers and Neighbours).

Transport

Car Parking

- 7.81 Policy DP18 (Parking Standards and Limiting the Availability of Car Parking) expects development to be car free in the Central London Area and other areas that have good accessibility to public transport.
- 7.82 The site has a PTAL of 6b which indicates excellent accessibility to public transport. As such, it is proposed to make the development a car free scheme. This will be ensured by a Unilateral Undertaking that our client will enter into with the London Borough of Camden.
- 7.83 Given the above, the proposed parking situation of the scheme fully complies with Policy DP18 of the Development Management Policies Document.

Cycle Parking

- 7.84 Policy DP18 (Parking Standards and Limiting the Availability of Car Parking) states that development should comply with the Parking Standards set out in Appendix 2 of the Development Management Policies Document.
- 7.85 The cycle parking standards require that 1 bicycle storage space be provided per residential unit and 1 bicycle storage space per 250 sq.m of B1 Office space from a threshold of 500 sq.m.

7.86	As such, 1 bicycle storage space per residential unit has been provided as part of the development
	and none have been proposed for the offices as they fall below the 500 Sq.m threshold.

7.87	Given the above, the scheme complies with Policy DP18 of the Development Management Policies
	Document.

8. CONCLUSIONS

- 8.1 The proposed scheme would refurbish and restore a Grade II* listed building that is in a poor state of repair. The removal of the modern rear extension would enhance the special interest of the listed building by restoring the architectural significance of the building.
- 8.2 The proposed works would prevent the building from being entered onto the listed buildings at risk register.
- 8.3 The proposed scheme would restore the listed building and undertaking important restoration and repair works that are vital to its future sustainability and long term future. The works to building would include the removal of asbestos and repairs to the fabric of the building following water leak damage.
- 8.4 The internal layout of the building would be much restored to its original form and character, such as the opening up of the vaults in the basement area and the removal of non-original partition walls on all floors.
- The daylight and sunlight levels of the flats would be maintained as a result of the proposed internal changes.
- 8.6 The residential units and offices that would result from the scheme would have a much better internal layout and practical utility that would better meet the needs of modern business and residential occupiers.

A1. APPLICATION SUBMISSION DOCUMENTS

- Application forms and certificates duly signed and dated, and CIL Form, prepared by Iceni Projects Ltd;
- CIL Additional Information Form, prepared by Iceni Projects Ltd on behalf of the Applicant;
- Planning and Construction drawings, prepared by Purcell Ltd;
- Document Issue Sheet, prepared by Purcell Ltd;
- Design & Access Statement, prepared by Purcell Ltd;
- Heritage Statement & Impact Assessment, prepared by Purcell Ltd; and
- Planning Statement, prepared by Iceni Projects Ltd;