



MARCH 2017

# Planning Statement

40 Great James Street, London, WC1N 3HB

Iceni Projects Limited on behalf of  
Ms Kay Georgiou

March 2017

ICENI PROJECTS LIMITED  
ON BEHALF OF MS KAY  
GEORGIOU

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**Planning Statement**  
40 GREAT JAMES STREET, LONDON, WC1N 3HB



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# 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 applications at 40 Great James Street, London, WC1N 3HB.
- 1.2 The overarching objective of the development proposals is to secure the long-term function of the building by delivering a high quality sustainable mixed use development which responds to and enhances the special interest of the building. The proposed development complies with the statutory tests, with regulations of listed building and conservation areas and is compliant with the relevant London Plan and Camden development plan policies.
- 1.3 Ms Georgiou is the applicant and freehold owner of the building and shall be the end user of both the residential and office accommodation. The applicant’s commitment to the building for the long-term has been key to the evolution of our proposal.
- 1.4 Planning permission and listed building consent is sought for the following descriptions of development:

## **Full Planning Permission:**

*‘Demolition of walls and bridge area to the rear and creation of a rear courtyard area, removal of slab floor at basement and lowering of floor level to accommodate ceiling height, creation of roof terrace at fourth floor level, relocation of all servicing and runs, locating of condenser units at roof level and amalgamation of second and third floor levels from two separate residential flats to one two bed residential flat.’*

## **Listed Building Consent:**

*‘Demolition of walls and bridge area to the rear and creation of a rear courtyard area, removal of slab floor at basement and lowering of floor level to accommodate ceiling height, insertion of servicing rooms in the front vaults, creation of roof terrace at first floor level, removal of ceiling joists in one bedroom at third floor level, creation of roof terrace at fourth floor level, relocation of all servicing and runs, locating of condenser units at roof level and amalgamation of second and third floor levels from two separate residential flats to one two bed residential flat.’*

- 1.5 The application is submitted to the London Borough of Camden (“LB Camden” the “Council”) in the context of recently granted planning permission and listed building applications (detailed below) which related to the refurbishment and restoration the Grade II\* listed building in a manner appropriate to its special interest and in order to secure the long term future of the building.

- 1.6 Planning permission and listed building consent were granted on 20 January 2016 for the following:

**Full Planning Permission (2015/3885/P):**

*Demolition of modern kitchenette in rear courtyard area; creation of roof terrace (with timber and metal staircase); replacement of staircases to the basement at front and rear lightwells; addition of French doors in the west wall at basement level; relaying of clay tiles to the outer slope area of the roof.*

**Listed Building Consent (2015/4560/L):**

*Demolition of modern kitchenette in rear courtyard area; creation of roof terrace (with timber and metal stair); replacement of staircases to the basement at front and rear lightwells; addition of French doors in the west wall at basement level; relaying of clay tiles to the outer slope area of roof and internal works including the 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.*

- 1.7 The approved applications 2015/4560/L and 2015/3885/P have been lawfully implemented and all pre-commencement conditions discharged. Since then, it was apparent that the approved scheme was not fully implementable and overall it was not considered to achieve the site's maximum potential in terms of both use and heritage benefits. The principal changes associated with applications 2015/3885/P and 2015/4560/L are as follows:

- Providing a one bedroom flat on the third floor with no kitchen area;
- Providing a disabled access toilet at ground floor which did not have sufficient access width for a wheelchair user;
- Failing to provide a solution to satisfy Building Regulations requirements with regard to fire proofing;
- Providing locations of servicing and runs in areas which would require substantial removal of original historic fabric; for example core drilling into the rear vaults from ground floor to lower ground floor level;
- Failing to provide a method of how the office (Class B1a) floorspace and residential (Class C3) floorspace would operate harmoniously; and
- Failing to provide locations of proposed free-standing radiators.

- 1.8 As such, following the approval of the first scheme, a new Architect was appointed with a view to having a look at where better opportunity lay to improve heritage benefits and where there was scope for further maximisation of the existing site and land uses in order to best secure the long term future of the significant heritage asset.

- 1.9 The proposed scheme would result in the following changes to granted schemes 2015/3885/P and 2015/4560/L:

#### **Basement Level**

- Removal of unoriginal stair from ground to basement level and replacement with a new stair.
- Insertion of servicing rooms within front vaults to house water tanks and boiler.
- Basement floor level (office Class B1a use) is proposed to be heated by underfloor heating, installed within new slab and new units for cooling and ventilation concealed behind new joinery.
- Creation of winter garden.

#### **Ground Floor Level**

- Relocation of all servicing and runs from external boxing on rear façade and to internally located behind new false panelling.
- Insertion of air source heat pump (ASHP) to heat/cool the building at ground floor level (office Class B1a use). Freestanding units with cover to be located under windows and visible to retain historic plan form layout. Gas fires inserted within existing fireplace openings to provide additional top-up heat.
- Full demolition of existing full width rear extension and erection of a new full width extension.

#### **First Floor Level**

- Relocation of all servicing and runs from external boxing on rear façade and to internally located behind new false panelling.
- Insertion of air source heat pump (ASHP) to heat/cool the building at first floor level (office Class B1a use). Freestanding units with cover to be located under windows and visible to retain historic plan form layout. Gas fires inserted within existing fireplace openings to provide additional top-up heat.
- Roof terrace at first floor level to be relocated and extended to full width.

#### **Second Floor Level**

- Relocation of all servicing and runs from external boxing on rear façade and to internally located behind new false panelling.
- Second floor level (residential flat Class C3) is proposed to be heated with the inclusion of a trench heater and gas fires inserted within existing fireplace openings to provide additional top-up heat. Within residential bathrooms, underfloor heating is proposed with a heated towel rail proposed to offset heat intensity.

- Amalgamation of two residential flats (Class C3) at second and third floor level to one residential flat (Class C3).
- Insertion of new partition wall and door at second floor level to comply with building regulations fire regulations.

#### **Third Floor Level**

- Relocation of all servicing and runs from external boxing on rear façade and to internally located behind new false panelling.
- Third floor level (residential flat Class C3) is proposed to be heated with the inclusion of a trench heater and gas fires inserted within existing fireplace openings to provide additional top-up heat. Within residential bathrooms, underfloor heating is proposed with a heated towel rail proposed to offset heat intensity.
- Removal of ceiling joists to front bedroom to improve ceiling height and space.

#### **Fourth Floor Level**

- Condenser units for air conditioning units are proposed to be located on the flat area of the M profile roof.
- Creation of roof terrace above existing flat roof.

1.10 Further detail of the proposed development are outlined in the accompanying Design and Access Statement, prepared by Emrys Architects.

1.11 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.

- 1.12 This Planning Statement forms one of the documents for this planning and listed building consent applications. A full schedule of which is set out in **Appendix A1**.



## 2. THE SITE AND SURROUNDING AREA

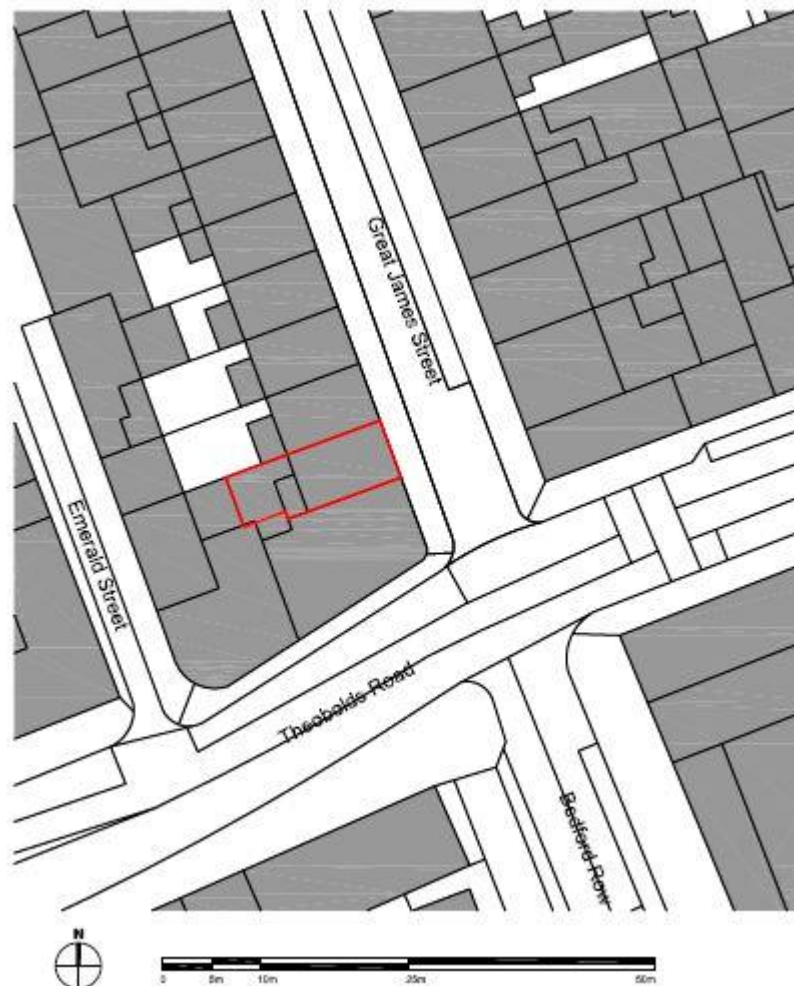
- 2.1 This section describes the application site, its policy designations/allocation and the surrounding area.

### The Application Site

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- 2.2 The application site is 40 Great James Street, London WC1N 3 HB and comprises a Grade II\* listed Georgian townhouse in the Bloomsbury Conservation Area. A red line site location plan is provided at **Figure 2.1**.

**Figure 2.1** Site Location Plan



*Source: Emrys, 2016*

- 2.3 The site presents a four storey (plus basement) frontage to Great James Street, with the basement windows having access to light from a lightwell at street level. 40 Great James Street is a mixed use

building comprising x 3 offices (Class B1a) at basement, ground and first floor level, and x 2 residential flats (Class C3) at second and third floor level.

- 2.4 The building at number 40 Great James Street forms part of a larger Grade II\* listing with number 26-37 and 39-40 (and their attached railings). The detail of this listing for number 40 (which includes numbers 27-38) notes the '*good wood architraved doorcase with enriched, carved brackets carrying hoods with panelled soffits, most with patterned fanlights and panelled doors*'.
- 2.5 On the building's eastern elevation, which fronts Great James Street, there are three sash windows at second, third and fourth floor levels respectively. At the ground and lower ground floor levels there are two sash boxes respectively.
- 2.6 The rear of the building is enclosed due to the proximity of the other immediately surrounding properties along Theobalds Road and Emerald Street.
- 2.7 The building dates from the 1720s and has recently been granted planning permission and listed building consent for the removal of modern additions to the rear, removal of unoriginal partitions, as well as the enhancement of the existing Grade II\* building with installation of new service runs, creation of a roof terrace to the rear, retention of historic clay tiles and channelling of caballing and switches within discrete chases behind architraves.
- 2.8 The site is approximately a 640m walk from Holborn Underground station and 640m walk from Chancery Lane Underground station. As such, the site is afforded a PTAL of 6b indicating excellent accessibility to public transport.

### **The Surrounding Area**

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- 2.9 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.
- 2.10 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.

### **Policy Designations/Allocations**

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- 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 6 of this statement.

### 3. PLANNING HISTORY

3.1 This section summarises the site's planning history and relevant planning decisions.

3.2 The electronic planning history records held by London Borough of Camden were inspected and there are only two consents that are relevant to this planning application:

3.3 On 20 January 2016 planning permission (ref. 2015/3885/P) was granted for:

Demolition of modern kitchenette in rear courtyard area; creation of roof terrace (with timber and metal staircase); replacement of staircases to the basement at front and rear lightwells; addition of French doors in the west wall at basement level; relaying of clay tiles to the outer slope area of the roof.

3.4 On 20 January 2016 listed building consent (ref. 2015/4560/L) was granted for:

Demolition of modern kitchenette in rear courtyard area; creation of roof terrace (with timber and metal stair); replacement of staircases to the basement level; relaying of clay tiles to the outer slope area of the roof and internal works including the 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.

3.5 All pre-commencement conditions have been discharged and these permissions have been implemented.

3.6 A schedule of planning history is enclosed at **Appendix A3**.

## 4. PRE-APPLICATION CONSULTATION

- 4.1 The application proposals are the result of pre-application discussions held with planning officers at the London Borough of Camden. A site visit was undertaken on 15 December 2016. The formal written response received from Jonathan McClue and Sarah Freeman is enclosed at **Appendix A4**.
- 4.2 Further pre-application advice was sought from Alasdair Young at Historic England with a site visit being undertaken on 11 January 2017. The formal written response is enclosed at **Appendix A5**.
- 4.3 A summary of the written responses and the proposed responding amendments are enclosed at **Appendix A6**.

### Response to consultation

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- 4.4 In response to the pre-application consultation, the design team have made the following amendments to the scheme:

#### Basement Level

- Provision of 1 cycle parking space located in the front vault at basement level.
- It is proposed to utilise the north vault (B/01) to house servicing units. In addition, given the limitations to space it is proposed to utilise the south vault (B/02) to house water tank. Water tank is external grade and can sit on top of the existing floor finish. Plant inserted within B/02 is of external grade. Full detailed justification of this is set out in the accompanying heritage statement.

#### Ground Floor Level

- Stair from ground floor to basement has been reintroduced to retain plan form.
- Full justification regarding the relocation of services outlined in this statement with detailed heritage justification outlined within the accompanying heritage statement.
- Detailed justification regarding demolition of rear bridge area included as part of this application.
- Proposed ASHP units redesigned to be free-standing in order to retain historic plan form.
- Full justification regarding the need for ASHP is outlined within this statement and accompanying heritage statement. Locations of units and trench heaters are shown in accompanying drawings, prepared by Emrys Architects.

#### First Floor Level

- Glazed roof enclosure to terrace access has been reduced in size and off set from boundary.

- Full justification regarding the relocation of services outlined in this statement with detailed heritage justification outlined within the accompanying heritage statement.

#### **Second Floor Level**

- Existing non original partition retained adjacent to kitchen.
- Proposed fire proof screen and new door at landing level glazed in order to maintain recognition of plan form as well as retaining light flows through the staircase.
- Further detail regarding trench heater included as part of this application.

#### **Third Floor Level**

- Further detail regarding trench heater included as part of this application.
- Detailed justification for the removal of ceiling joists included as part of this application.

## 5. THE PROPOSED DEVELOPMENT

### 5.1 Planning permission is sought for:

#### **Full Planning Permission:**

*'Demolition of walls and bridge area to the rear and creation of a rear courtyard area, removal of slab floor at basement and lowering of floor level to accommodate ceiling height, creation of roof terrace at fourth floor level, relocation of all servicing and runs, locating of condenser units at roof level and amalgamation of second and third floor levels from two separate residential flats to one two bed residential flat.'*

#### **Listed Building Consent:**

*'Demolition of walls and bridge area to the rear and creation of a rear courtyard area, removal of slab floor at basement and lowering of floor level to accommodate ceiling height, insertion of servicing rooms in the front vaults, creation of roof terrace at first floor level, creation of roof terrace at fourth floor level, relocation of all servicing and runs, locating of condenser units at roof level and amalgamation of second and third floor levels from two separate residential flats to one two bed residential flat.'*

5.2 The scheme proposes amalgamation of second and third floor levels from two separate residential (Class C3) flats to one two bed residential (Class C3) flat. Alongside this, there are internal and external changes proposed namely to make the most of opportunities for making improvements and enhancements and ensure the longevity of the Grade II\* listed building for the end user.

5.3 The proposal seeks to achieve:

#### **Basement Level**

- Removal of unoriginal stair from ground to basement level and replacement with a new stair.
- Insertion of servicing rooms within front vaults to house water tanks and boiler.
- Basement floor level (office Class B1a use) is proposed to be heated by underfloor heating, installed within new slab and new units for cooling and ventilation concealed behind new joinery.
- Creation of winter garden.

#### **Ground Floor Level**

- Relocation of all servicing and runs from external boxing on rear façade and to internally located behind new false panelling.

- Insertion of air source heat pump (ASHP) to heat/cool the building at ground floor level (office Class B1a use). Freestanding units with cover to be located under windows and visible to retain historic plan form layout. Gas fires inserted within existing fireplace openings to provide additional top-up heat.
- Full demolition of existing full width rear extension and erection of a new full width extension.

#### **First Floor Level**

- Relocation of all servicing and runs from external boxing on rear façade and to internally located behind new false panelling.
- Insertion of air source heat pump (ASHP) to heat/cool the building at first floor level (office Class B1a use). Freestanding units with cover to be located under windows and visible to retain historic plan form layout. Gas fires inserted within existing fireplace openings to provide additional top-up heat.
- Roof terrace at first floor level to be relocated and extended to full width.

#### **Second Floor Level**

- Relocation of all servicing and runs from external boxing on rear façade and to internally located behind new false panelling.
- Second floor level (residential flat Class C3) is proposed to be heated with the inclusion of a trench heater. Gas fires proposed to be inserted within existing fireplace openings to provide additional top-up heat. Within residential bathrooms, underfloor heating is proposed with a heated towel rail proposed to offset heat intensity.
- Amalgamation of two residential flats (Class C3) at second and third floor level to one residential flat (Class C3).
- Insertion of new partition wall and door at second floor level to comply with building regulations fire regulations.

#### **Third Floor Level**

- Relocation of all servicing and runs from external boxing on rear façade and to internally located behind new false panelling.
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- Removal of ceiling joists to front bedroom to improve ceiling height and space.



#### **Fourth Floor Level**

- Condenser units for air conditioning units are proposed to be located on the flat area of the M profile roof.
- Creation of roof terrace above existing flat roof.

5.4 Further detail of the proposed development are outlined in the accompanying Design and Access Statement, prepared by Emrys Architects.

5.5 The proposed scheme proposes further improvement to the Grade II\* listed building and would achieve further heritage benefits. Further detail and assessment is set out in the accompanying heritage statement, prepared by Iceni Projects Heritage.

## 6. POLICY FRAMEWORK

- 6.1 This section provides an overview of the Development Plan and guidance relevant to the consideration of these proposals.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan (DP), unless material considerations indicate otherwise.

### **Policy Framework**

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- 6.3 Planning policy operates at three levels.
- 6.4 At the national level, Central Government produces guidance in the form of the National Planning Policy Framework (NPPF).
- 6.5 At the regional level, the Mayor's London Plan (2015) and Minor Alterations to the London Plan (2016).
- 6.6 Planning policy at the local level is contained within policies set out in the London Borough of Camden adopted Core Strategy (2010) and the adopted Camden Development Policies (2010).
- 6.7 The London Borough of Camden is in the process of preparing a new Local Plan to supersede the Core Strategy and Development Policies. The draft Local Plan has been submitted for Examination with Public Hearings completed in October 2016. Whilst the Local Plan has not yet been adopted, given its position in preparation, weight is given to the emerging policies.

### **Listed Building and Conservation Areas Act**

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- 6.8 Given the building is a Grade II\* listed building and located in the Bloomsbury Conservation Area, it is necessary to pay special attention to the architectural and special interest of the listed building as required by Section 6 of the Planning (Listed Building and Conservation Area) Act 1990 as well as the desirability of preserving or enhancing the character or appearance of the listed building as required by Section 72(1) of the Planning (Listed Building and Conservation Area) Act 1990.
- 6.9 An assessment is contained within the following chapter. A full detailed assessment is contained within the accompanying Heritage Statement prepared by Icen Projects Heritage and submitted in support of the application proposals.

## **National Policy**

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- 6.10 The National Planning Policy Framework (NPPF), published in March 2012, sets out the Government's planning policies for England and how these are expected to be applied.
- 6.11 The key theme throughout the NPPF is the presumption in favour of sustainable development. Paragraph 14 of the NPPF states the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking. In terms of decision taking, this means approving development proposals that accord with the Development Plan (DP) without delay and granting planning permission where the DP is absent, silent or relevant policies are out of date, unless adverse impacts would significantly and demonstrably outweigh the benefits of the proposals.
- 6.12 The presumption in favour of sustainable development is supported by 12 core planning principles which guide both plan-making and decision-taking, including that the overarching role of planning which should be to:
- Secure high quality design and a good standard of amenity;
  - Conserve heritage assets in a manner appropriate to their significance; and
  - Contribute to conserving and enhancing the natural environment and reducing pollution.
- 6.13 Guidance to LPAs is to approach decision-taking in a positive way (Paragraph 186) and in doing so, decision takers at every level should look for solutions rather than problems (Paragraph 187).
- 6.14 The NPPF is supported by the National Planning Policy Guidance (NPPG).

## **The Development Plan**

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- 6.15 The statutory Development Plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act (2004) is the London Plan, Core Strategy (2010) and the adopted Camden Development Policies (2010).
- 6.16 Policies relevant to the determination of this application are listed below:

### **Camden Core Strategy (2010)**

- CS5 (Managing the impact of growth and development)
- CS6 (Providing quality homes)
- CS8 (Promoting a successful and inclusive Camden economy)

- CS11 (Promoting sustainable and efficient travel)
- CS13 (Tackling climate change through promoting higher environmental standards)
- CS14 (Promoting high quality places and conserving our heritage)
- CS19 (Delivering and monitoring the Core Strategy)

#### **Camden Development Policies (2010)**

- DP2 (Making full use of Camden's capacity for housing)
- DP5 (Homes of different sizes)
- DP6 (Lifetime homes and wheelchair homes)
- DP13 Employment sites and premises
- 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)
- DP27 Basements and lightwells
- DP28 (Noise and vibration)

#### **Other relevant Planning Policy**

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##### **Local**

- 6.17 The following guidance documents produced by the London Borough of Camden are relevant to this application:

- Camden's Planning Guidance (CPG)1 Design (2015);
- CPG 2 Housing (2016);
- CPG3 (Sustainability) 2015;
- CPG4 (Basements and lightwells) 2015;
- CPG 6 Amenity;
- CPG7 (Transport) 2011;
- CPG8 (Planning obligations) 2015; and
- Also of relevance is the Bloomsbury Conservation Area Appraisal and Management Strategy (2011).

#### **Draft Local Plan Emerging Policies**

6.18 The submission draft Local Plan is also a material consideration. As such, the following emerging policies are also of relevance in the determination of this application:

- H3 (Protecting existing homes)
- H6 (Housing choice and mix)
- H7 (Large and small homes)
- E1 (Promoting a successful and inclusive Camden economy)
- E2 (Employment premises and sites)
- A1 (Managing the impact of development)
- A4 (Noise and vibration)
- D1 (Design)
- D2 (Heritage)
- CC1 (Climate change mitigation)
- T1 (Prioritising walking, cycling and public transport)
- T2 (Car-free development and limiting the availability of parking)
- T4 (Promoting the sustainable movement of goods and materials)

- DM1 (Delivery and monitoring)

6.19 Rather than assess each policy individually, these have been assessed in the following section of this Planning Statement alongside the analysis / consideration of the relevant planning issues.

## 7. PRINCIPAL PLANNING CONSIDERATIONS

7.1 This section assesses the key planning considerations relevant to the determination of this application including:

- Land Use;
- Amenity;
- Conservation and Heritage;
- Archaeology;
- Waste and Recycling; and
- Transport.

7.2 As discussed in terms below.

### Land Use

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7.3 The previous approved application established that the building was within its lawful residential (Class C3) use and office (Class B1a) use until late 2014. Currently, the basement, ground and first floors comprise office (Class B1a) space and the second and third floors comprise two separate self-contained residential (Class C3) flats.

### Office Land Use

7.4 There are no changes proposed to the office (Class B1a) floorspace. Basement, ground and second floor levels would remain as office (Class B1a) use.

7.5 Improvement to the layouts of the meeting room areas and circulation space results in an overall increase in office (Class B1a) floorspace of 15.3sq m. This is outlined in **Table 7.1** below.

**Table 7.1**

	Existing (m <sup>2</sup> )	Proposed (m <sup>2</sup> )	Net GIA (m <sup>2</sup> )
Office (Class B1a) floorspace	230.2	245.5	+15.3

7.6 Furthermore, the benefit of the creation of a winter garden area in addition to the retention and improvements to the office floorspace is in line with planning policy as the office (Class B1a)

floorspace is protected overall. Policy CS 8 of the Core Strategy seeks to ensure the Borough retains a strong economy. As such, the retention of office (Class B1a) floorspace is considered acceptable in policy terms.

### Residential Land Use

- 7.7 As discussed earlier in this Statement, the site benefits from a recent grant of planning and listed building consent application which included the retention of both self-contained residential (Class C3) flats at second and third floor level.
- 7.8 Upon implementation of the recently granted scheme (, it was discovered that proposals relating to the residential (Class C3) floorspace at second and third floor levels were not fully implementable and impracticable. The flat at second floor level did not include a kitchen and as such was not considered practicable to deliver. Furthermore, following approval of the recently granted scheme, it was discovered that there was no arrangement in place for the granted scheme to meet Building Regulations requirements relating to fire safety. The arrangement for this scheme to meet Building Regulations requirements is discussed in a later paragraph of this Statement.
- 7.9 **Table 7.2** below shows the land use layout of the existing floor levels which are not proposed to be changed.

**Table 7.2 Land Use Mix**

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

- 7.10 The scheme proposes the amalgamation of both residential (Class C3) flats. There is no loss of any residential (Class C3) floorspace and only one planning unit would be lost. This is outlined in **Table 7.3** below:

**Table 7.3**

Floor	Existing Land Use	Proposed Land Use
Third	1 x 1 bedroom self-contained residential (Class C3) flat	1 x 2 bedroom residential (Class C3) flat
Second	1 x 1 bedroom self-contained residential (Class C3) flat	



## Housing Mix

- 7.11 Notwithstanding the individual self-contained flats failing to meet Building Regulations requirements, Camden's Strategic Housing Market Assessment (SHMA) 2016-31 (updated February 106) identifies that there is a greater need for 2 bedroom (19, 500) housing mix compared to 1 bedrooms (18, 200). As such, the amalgamation of the second and third floor residential (Class C3) flats is considered acceptable in terms of housing needs within the Borough. Policy H7 of the draft Local Plan supports this, in that there is an identified greater demand for 2 bedroom dwellings rather than 1 bedroom. Extract from chapter 3 of the draft Local Plan at **Figure 7.2** below demonstrates the need.

**Figure 7.2 Camden Housing Need: Dwelling Size Priorities**

	<b>1-bedroom</b>	<b>2-bedroom</b>	<b>3-bedroom</b>	<b>4-bedroom (or more)</b>
<b>Social-affordable rented</b>	medium	medium	high	medium
<b>Intermediate affordable</b>	high	lower	lower	lower
<b>Market</b>	lower	medium	high	medium

*Source: Camden Draft Local Plan, 2016*

- 7.12 Policy CS 6 of the Core Strategy seeks to ensure an increase in additional homes to the Borough from 2007-2017 including 4, 370 additional self-contained homes. The amalgamation of both one bedroom residential (Class C3) flats into a larger two bedroom residential (Class C3) flat is considered to meet the requirements of this policy.
- 7.13 Policy DP 2 of the Development Policies relates to maximisation in the supply of housing which Camden can achieve. The loss of housing in the Borough will be mitigated through the protection of residential uses. Camden will resist developments where there is a loss of residential floorspace. As the proposal seeks to amalgamate two residential planning units with no loss of residential floorspace it is considered in line with this policy. Furthermore Policy H3 (Protecting existing homes) of the Draft Local Plan supports this as losses in residential floorspace would be resisted.

## Quality of Living Accommodation

- 7.14 The recently granted scheme also included both flats having two separate entrances off the main staircase, which in addition to reduced quality of living, highlighted concerns with the privacy and separation between office (Class B1a) floorspace and residential (Class C3) floorspace. In addition to the proposed solution to meeting Building Regulation requirements, the scheme proposes the insertion of a secondary door within the landing at second floor level. This element will improve the quality of living accommodation by providing a separate entrance from office (Class B1a) to residential (Class C3) floorspace. Thus mitigating potential noise impacts and improving privacy.

7.15 Camden's Planning Guidance 2 document (Housing) states that the general principle of residential developments in the Borough are required to create high quality homes with each self-contained accommodation having *'its own kitchen, bathroom and toilet for the sole use of occupants behind a separate front door'*.

7.16 As such, given the above assessment of the current quality of available accommodation is considered substandard, not meeting fire requirements and layout arrangement falling below the needs of the Borough, it is considered that the amalgamation of the second and third floor flat is acceptable in policy terms.

### **Amenity**

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7.17 Policy DP 26 (Managing the Impact of Development on Occupiers and Neighbours) states that the Council will only grant permission for developments that do not cause any harm to amenity. In taking that decision the Council will consider visual privacy, overlooking, overshadowing and outlook.

### **Overlooking and Overshadowing**

7.18 The changes proposed to the building would not result in overlooking or overshadowing of neighbouring properties or of the existing residential units.

7.19 During pre-application discussion with Camden officers it was considered that the access to the roof terrace at first floor level, which included a staircase within an enclosed glazed box was considered to cause an impact on the amenity to neighbouring properties along Theobalds Road. Following further discussion with the design team, this element has been redesigned to incorporate a more sensitive design which reduces the massing and size of the glazed box. Furthermore, the location of access stair has been repositioned away from the boundary wall, thus further mitigating any potential for overlooking.

7.20 Additionally, the fourth floor roof terrace includes measures for mitigation of any potential for overlooking through the inclusion of plants and screening.

### **Outlook**

7.21 The alterations to the rear of the property including the creation of an enclosed winter garden area are an improvement to the existing rear outlook. Therefore providing a better quality external area improves outlook for future occupiers as well as neighbouring occupiers. As such, there are no impacts from this scheme upon outlook.

7.22 Given the above assessment of impact on amenity, overlooking, overshadowing and outlook on neighbouring properties, the proposal is considered acceptable in policy terms.

## **Noise**

- 7.23 Condenser units for air conditioning units are proposed to be located on the flat area of the M profile roof.
- 7.24 The condenser units would be discreetly located in the flat area between both roof pitches and as such would not negatively impact views from the surrounding conservation area. It was noted during pre-application that a Noise Impact Assessment would be required as part of this submission. This has been submitted as a standalone document in support of the application proposals.
- 7.25 The results found that with the inclusion of proposed condenser units located on the roof, the predicted noise level achieves Camden Council requirements.
- 7.26 Given the above assessment of noise impacts on neighbouring properties, the proposal is considered acceptable in policy terms.

## **Conservation and Heritage**

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- 7.27 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.
- 7.28 A comprehensive Heritage Statement and Impact Assessment, prepared by Icen Projects Heritage, which assesses the heritage impacts of the proposed scheme accompanies this planning application and should be read alongside this Statement.

## **Conservation Area**

- 7.29 Section 72(1) of the 1990 Act requires that developments within should preserve or enhance the character and appearance of the conservation area.
- 7.30 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.
- 7.31 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.

- 7.32 The exterior changes of the proposed scheme are focused to the rear of the property. The most significant proposal is to demolish the bridge link area above the rear vaults, enclose the area with a glazed roof to create a winter garden area.
- 7.33 The alterations 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 enhance the appearance of the significant heritage asset.
- 7.34 Given the above, the proposed scheme would make a positive contribution to the Bloomsbury Conservation area and as such complies with Policy DP 25 (Conserving Camden's Heritage) as well as the statutory provisions of the Act.

#### **Listed Building**

- 7.35 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.
- 7.36 Policy DP 25 (Conserving Camden's Heritage) of Camden's 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.
- 7.37 The scheme proposes a number of internal and external changes to the building.

#### **Internal Changes**

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- 7.38 The internal changes proposed to the building include:

##### **Basement Level**

- Lowering of floor within basement.
- Insertion of servicing rooms in the front vaults to house boiler and water tanks.
- Underfloor heating proposed at basement level.
- Removal of internal unoriginal stair from ground to basement level and replacement with a new stair.

### **Ground Floor Level**

- Relocation of all servicing and runs from external boxing on the rear façade and located internally behind new false panelling.
- Insertion of air source heat pump (ASHP) to heat/cool the building at ground floor level. Gas fires inserted within existing fireplace openings to provide additional top-up heat.

### **First Floor Level**

- Relocation of all servicing and runs from external boxing on the rear façade and located internally behind new false panelling.
- Insertion of air source heat pump (ASHP) to heat/cool the building at first floor level. Gas fires inserted within existing fireplace openings to provide additional top-up heat.

### **Second Floor Level**

- Trench heaters proposed at second floor level. Gas fires inserted within existing fireplace openings to provide additional top-up heat.
- Insertion of a new door at second floor level landing with glazed fire screen.

### **Third Floor Level**

- Trench heater proposed at third floor level. Gas fires inserted within existing fireplace openings to provide additional top-up heat.
- Underfloor electric mat proposed to heat bathroom.

### **External Service Risers**

- 7.39 The recently approved scheme made provision for external service risers at the rear of the building, though it was not clarified how the services would puncture the external elevation or how this 'box' would appear. It is proposed, following further investigation, to locate a service riser throughout the building in an area to the south-west within the rear rooms. This area to all floors except the basement, third and fourth floor levels are currently panelled. However, the panelling has been altered in this location as it is forward of the line of the surrounding panelling, with a slim return that appears to be of a modern timber at its side. The current proposal is to place a service riser in front of this area of panelling, behind new false panelling and providing a new and matching return in place of the modern timber return.

### **Lowering of Basement Floor**

- 7.40 It is proposed to lower the floor within the basement area to firstly create a more useable space through increasing ceiling height and secondly to accommodate the insertion of servicing runs, a proposed drainage system (Newton system) and underfloor heating. Given the minor scale of excavation, it is noted that a Basement Impact Assessment is not required.

#### **Insertion of servicing rooms in the front vaults to house boiler and water tanks**

- 7.41 The previously approved scheme identified the north vault to the front of the building, B/01 has been modernised. With this regard, it is proposed to use this vault to house servicing boxes. It has also previously been noted within the Heritage Statement prepared by Purcell to support the proposals approved under 2015/3885/P and 2016/4650/L, that the south vault B/02 remained untouched. However, in order to accommodate both servicing boxes and cycle parking within B/01, it is proposed to house the water tank within B/02. The water tank is a standalone tank, which would be insulated for protection and as such would not cause any harm to the existing original historic fabric in this area.

#### **Insertion of Air Source Heat Pump (ASHP)**

- 7.42 The insertion of ASHP at lower ground, ground and first floor levels is considered necessary for two reasons. Firstly, upon completion of the final development, the Applicant will occupy the office (Class B1a) floorspace (lower ground, ground and first floor levels only) for operation by her business. It is important to highlight that the Applicant and end user is a Solicitor whom specialises in highly confidential divorce and mediation work. As such, the space has been designed to enable the occupancy of the Applicant and end user. Due to the nature of work which shall occur in the office floorspace, this shall generate significant heat gains which may exceed comfort levels expected from an office of this type during the summer season. Furthermore, the business will require security to maintain the confidentiality of the information with which it operates. Therefore, opening of windows to provide cooling is unacceptable as the Applicant and end user must legally abide by regulations to ensure upmost confidentiality in the operation of business. As such, were the windows to be opened to provide cooling, the risk of confidential conversations being leaked is high which would result in our Applicant breaching legal regulations which would incur serious implications for the operation of business. For these reasons, it is proposed to provide reverse cycle air conditioning which will provide heating during the winter and cooling during the summer.
- 7.43 Secondly, it was considered more practical to propose one single unit to provide both heating and cooling rather than propose multiple units to separately provide heating and cooling. Singular units occupy less space and therefore reduce impact upon the historic plan form of rooms. Furthermore, the overall efficiency, in terms of carbon consumption for a well-designed Air Source Heat Pump is marginally better than a gas fired boiler system, when using the current carbon factors published by the UK Government GHG working group, dated 2016.
- 7.44 It is also important to note that the strategy for heating to the upper floors (Second and third floor levels) is by Gas fired boilers where there is no significant demand for cooling and openable windows are acceptable.

### **Insertion of a New Door and Fire Screen**

- 7.45 As discussed earlier in this Statement, the insertion of a door at second floor level is necessary in order to improve the standard of living accommodation for the residential (Class C3) flats. The insertion of a glazed partition is necessary in order to achieve building regulation requirements regarding fire protection. Furthermore, the office (Class B1a) floorspace requires full separation from residential (Class C3) floorspace for confidentiality reasons. In addition, given the history of uses within the building are not proposed to change, the proposals maintain the historic use and character.

### **Removal and Replacement of Stair**

- 7.46 The internal staircase from ground to basement is identified as being a modern replacement. As such, the removal and replacement with a new stair is considered acceptable as this maintains reference to the original historic plan form.

### **External Changes**

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- 7.47 The external changes proposed to the building are:

#### **Basement Level**

- Demolition of 19 century walls forming bridge link.

#### **Ground Floor Level**

- Demolition of rear bridge link to create a winter garden.

#### **First Floor Level**

- Insertion of glazed infill roof to rear courtyard area creating an enclosed winter garden area.
- Repositioning of approved first floor roof terrace.
- Access stair to roof terrace proposed to be enclosed within a glazed box structure.

#### **Second Floor Level**

- There are no external changes at this level.

#### **Third Floor Level**

- There are no external changes at this level.

#### **Roof Level**

- Condenser units for air conditioning units proposed to be located on the flat area of the M profile roof.

### **Reconfiguration of rear areas**

- 7.48 The current rear courtyard is undersized and limited in space. As such, the current area is not considered a useable space. The bridged area prevents sunlight flow into the courtyard and limits

the usability of the space. Following inspection during site visits, it was established that the bridge link area has historically undergone significant alterations. As such, the case for the demolition of this altered fabric and brickwork is fully outlined and justified in the accompanying Heritage Statement. Policy CS 14 (promoting high quality places and conserving our heritage) outlines that the Council will ensure that developments are of the highest standard design that respects local context and character. As such, the creation of a rear winter garden area is considered acceptable in policy terms.

#### **Insertion of glazed infill roof to rear courtyard area creating an enclosed winter garden area**

- 7.49 The winter garden area is proposed to be enclosed by a glazed infill roof. The glazed roof would enable light flows to enter the rear garden area whilst respecting the materiality of the historic building. The transparency will also allow views of the rear elevations from within the courtyard, retaining legibility of the elevation and of the sense of an external space between the principal building and its utilitarian rear areas.

#### **Repositioning of approved first floor roof terrace**

- 7.50 The approved scheme granted permission for a roof terrace at first floor level. The proposed scheme seeks to marginally change the position of this roof terrace with a new access proposed within an enclosed glazed structure. The glazed structure is proposed step away from the boundary with the roof sloped towards the boundary to reduce impacts upon neighbouring properties along Theobalds Road. Additionally, this would be a lightweight transparent structure which would retain legibility of the elevation to the rear.

#### **Condenser units for air conditioning units proposed to be located on the flat area of the M profile roof**

- 7.51 The flat area of the M profile roof is not visible from street level nor is it overlooked from neighbouring properties. The condenser units would be discreetly located in the flat area between both roof pitches and as such would not negatively impact views from the surrounding conservation area. It was noted during pre-application that a Noise Impact Assessment would be required as part of this submission. This has been submitted as a standalone document in support of the application proposals.
- 7.52 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 DP 25 of the Camden Development Management Policies Document and legislation found within the 1990 Act.



## **Archaeology**

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- 7.53 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.
- 7.54 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.

## **Waste and Recycling**

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- 7.55 Waste and recycling would be stored in the kitchen area of the residential (Class C3) flat located within the development and would then be placed on the street up to 1 hour before waste and recycling would be collected.
- 7.56 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.
- 7.57 Confidential waste relating to the office (Class B1a) units would be collected via a specialist company.
- 7.58 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**

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### **Car Parking**

- 7.59 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.
- 7.60 The current arrangement of residential (Class C3) floorspace i.e. 2 x 1 bedroom self-contained residential (Class C3) flats, have the ability to each apply for parking permits. As such, there is a possibility to apply for 2 parking permits currently.
- 7.61 The proposed scheme seeks to amalgamate both residential (Class C3) flats into 1 x 2 bedroom residential (Class C3) flat and reducing the number of parking permits which could be applied for

from 2 to 1. As the applicant would also be the end occupier of the residential flat, 1 parking permit would be applied for.

- 7.62 The site has a PTAL of 6b which indicates excellent accessibility to public transport.

#### **Cycle Parking**

- 7.63 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.
- 7.64 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.
- 7.65 As such 1 bicycle storage space for the residential unit is provided as part of the development and none have been proposed for the offices (Class B1a) as they fall below the 500 sq.m threshold.
- 7.66 Given the above, the scheme complies with Policy DP 18 of the Development Management Policies Document.

## **8. CONCLUSION**

- 8.1 This planning application has been sensitively designed in the context of the implemented permissions in order to further enhance the historic interest of the Grade II\* listed building, improving the external layout and improving and enhancing both residential (Class C3) and office (Class B1a) floorspace areas.
- 8.2 The proposals seek to achieve a resolution to outstanding problems with regard the recently approved and implemented scheme and, as such enabling the completion of a well-designed and sensitive development ensuring the longevity of the significant heritage asset.
- 8.3 The proposed loss of historic fabric with the new proposals is considered an improvement on the consented scheme which sought greater losses overall.
- 8.4 As highlighted within this statement, the proposals have responded appropriately to the advice given both from Ms Sarah Freeman and Mr Jonathan McClue of the London Borough of Camden and furthermore from Mr Alasdair Young of Historic England which identified an acceptable way forward for further renewal and enhancement of the significant heritage asset.
- 8.5 On balance, it is considered that the proposals are acceptable and planning permission and listed building consent should be granted.

## **A1. SUPPORTING DOCUMENTATION**

A1.1 This application is accompanied by:

- Application forms duly signed and dated, CIL form, prepared by Icen Projects Ltd;
- Planning Statement, prepared by Icen Projects Ltd;
- Heritage Statement and Impact Assessment, prepared by Icen Projects Ltd;
- Noise Impact Assessment, prepared by Auricl;
- Design and Access Statement, prepared by Emrys Architects; and
- Planning drawings, prepared by Emrys Architects.

## **A2. DRAWING SCHEDULE**



TITLE	SCALE	DRG NO.
<b>0100 EXISTING DRAWINGS</b>		
SITE PLAN	1/500@A3	1618-0100-AP-001
BASEMENT PLAN	1/50@A3	1618-0100-AP-002
GROUND FLOOR PLAN	1/50@A3	1618-0100-AP-003
FIRST FLOOR PLAN	1/50@A3	1618-0100-AP-004
SECOND FLOOR PLAN	1/50@A3	1618-0100-AP-005
THIRD FLOOR PLAN	1/50@A3	1618-0100-AP-006
FOURTH FLOOR PLAN	1/50@A3	1618-0100-AP-007
SECTION A	1/50@A3	1618-0100-AP-008
SECTION B	1/50@A3	1618-0100-AP-009
ELEVATION 1 AND 2	1/50@A3	1618-0100-AP-010
<b>0170 DEMOLITION SCOPE</b>		
BASEMENT PLAN	1/50@A3	1618-0170-AP-001
GROUND FLOOR PLAN	1/50@A3	1618-0170-AP-002
FIRST FLOOR PLAN	1/50@A3	1618-0170-AP-003
SECOND FLOOR PLAN	1/50@A3	1618-0170-AP-004
THIRD FLOOR PLAN	1/50@A3	1618-0170-AP-005
FOURTH FLOOR PLAN	1/50@A3	1618-0170-AP-006
SECTION B	1/50@A3	1618-0170-AP-007
<b>0200 PROPOSED PLANS</b>		
BASEMENT PLAN	1/50@A3	1618-0200-AP-001
GROUND FLOOR PLAN	1/50@A3	1618-0200-AP-002
FIRST FLOOR PLAN	1/50@A3	1618-0200-AP-003
SECOND FLOOR PLAN	1/50@A3	1618-0200-AP-004
THIRD FLOOR PLAN	1/50@A3	1618-0200-AP-005
FOURTH FLOOR PLAN	1/50@A3	1618-0200-AP-006
<b>0300 PROPOSED SECTIONS</b>		
SECTION A	1/100@A3	1618-0300-AP-001
SECTION B	1/100@A3	1618-0300-AP-002
SECTION C	1/100@A3	1618-0300-AP-003
DETAIL SECTIONS	1/50@A3	1618-0300-AP-004
<b>0400 PROPOSED ELEVATIONS</b>		
ELEVATION 1	1/100@A3	1618-0400-AP-001
ELEVATION 2	1/100@A3	1618-0400-AP-002
<b>SKETCHES</b>		
MODEL VIEW S - REAR	NTS	1618-SK-013
MODEL VIEW S - REAR	NTS	1618-SK-014
MODEL VIEW S - STAIR PARTITION	NTS	1618-SK-015
MEP DETAILS - FCU AND TRENCH HEATER	NTS	1618-SK-017
MEP DETAILS - RISER LOCATION	NTS	1618-SK-018
MEP DETAILS - SERVICES ROUTE, APPROVED AND PROPOSED	NTS	1618-SK-019
STAIR GLAZED PARTITION DETAILS	NTS	1618-SK-020

CLIENT: KAY GEORGIOU
PLANNING CONSULTANT: ICENI - KEIRON HODGSON / EMMA CONWELL
BUILDING CONTROL: BCA - IAIN THOMSON
MEP ENGINEER: MILIEU - CARL CARRINGTON
STRUCTURAL ENGINEER: MORTON PARTNERSHIP - MARY

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### A3. PLANNING HISTORY

Application Number	Development Description	Status	Date Registered
2015/3885/P	Demolition of modern kitchenette in rear courtyard area; creation of roof terrace (with timber and metal staircase); replacement of staircases to the basement at front and rear lightwells; addition of French doors in the west wall at basement level; relaying of clay tiles to the outer slope area of the roof.	Approved	10/08/2015
2015/4560/L	Demolition of modern kitchenette in rear courtyard area; creation of roof terrace (with timber and metal stair); replacement of staircases to the basement at front and rear lightwells; addition of French doors in the west wall at basement level; relaying of clay tiles to the outer slope area of the roof and internal works including the 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.	Approved	10/08/2015

#### **A4. LONDON BOROUGH OF CAMDEN PRE-APPLICATION WRITTEN RESPONSE**



Date: 12/01/17

Our ref: 2016/6556/PRE  
Contact: Jonathan McClue  
Direct line: 020 7974 4908  
Email: [Jonathan.McClue@camden.gov.uk](mailto:Jonathan.McClue@camden.gov.uk)

Kieron Hodgson/Emma Conwell  
Iceni Projects  
114-116 Charing Cross Rd  
London  
WC2H 0JR

**Development Management  
Planning Solutions Team**  
Culture & Environment Directorate  
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[planning@camden.gov.uk](mailto:planning@camden.gov.uk)  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Dear Mr Hodgson/Ms Conwell,

**40 Great James Street, London, WC1N 3HB**

I refer to your request for pre-application advice at the above address for:

*Demolition of walls and bridge area to the rear and creation of a rear courtyard area, removal of slab floor at basement and lowering of floor level to accommodate ceiling height, insertion of servicing rooms in the front vaults, creation of roof terrace at first floor level, removal of unoriginal partition wall at second floor level, creation of roof terrace at fourth floor level, relocation of all servicing and runs, locating of condenser units at roof level and amalgamation of second and third floor levels from two separate residential flats to one two bed residential flat.*

The comments below are based on the pre-application advice request received on 30/11/2016. A site visit was undertaken on 15/12/2016.

**Planning Policy**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that developments must be determined in accordance with the development plan unless material considerations indicate otherwise.

The documents which make up the development plan are the London Plan and the London Borough of Camden's Local Development Framework (LDF). There are a number of documents making up the LDF, but those primarily of concern in this instance are the Core Strategy (2010), and the Development Policies (2010). Other documents which are of relevance include the Proposals Map, and the Camden Planning Guidance (CPG).

It should be noted that the Camden Local Plan will replace the Core Strategy and Development Policies in 2017. The submission draft has now been approved by Cabinet and Full Council after a period of public consultation. The Local Plan and associated documents were formally submitted to the Secretary of State for public examination along with copies of all representations received on 24 June. In accordance with Section 20 of the Planning & Compulsory Purchase Act 2004, Inspector Katie Child, was appointed to conduct an examination to determine whether the Plan is sound. The public hearings for the Examination were held at the Camden Town Hall during October 2016.

The submission draft is a material consideration in planning decisions. At this stage the Plan has weight in decision making and is a statement of the Council's emerging thinking. Emerging policy is therefore a relevant consideration to this pre-application advice. If this scheme becomes a formal planning application then the level of weight given to the emerging plan will depend on its status at the time of submission.

The London Plan 2016 and National Planning Policy Framework (NPPF) are also important considerations.

A list of relevant policies is provided below.

### **Relevant Policies**

#### Camden Core Strategy 2010-2015:

- CS5 (Managing the impact of growth and development)
- CS6 (Providing quality homes)
- CS8 (Promoting a successful and inclusive Camden economy)
- CS11 (Promoting sustainable and efficient travel)
- CS13 (Tackling climate change through promoting higher environmental standards)
- CS14 (Promoting high quality places and conserving our heritage)
- CS19 (Delivering and monitoring the Core Strategy)

#### Camden Development Policies (Adopted 2010):

- DP2 (Making full use of Camden's capacity for housing)
- DP5 (Homes of different sizes)
- DP6 (Lifetime homes and wheelchair homes)
- DP13 Employment sites and premises
- 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)
- DP27 Basements and lightwells
- DP28 (Noise and vibration)

#### Camden Planning Guidance (Sections and paragraphs are quoted within the report where appropriate):

- CPG1 (Design) 2015
- CPG2 (Housing) 2015
- CPG3 (Sustainability) 2015
- CPG4 (Basements and lightwells) 2015
- CPG6 (Amenity) 2011
- CPG7 (Transport) 2011
- CPG8 (Planning obligations) 2015

Draft Local Plan 2015 (Emerging policies - weight given would be subject to status of plan at time of determination)

H3 (Protecting existing homes)  
H6 (Housing choice and mix)  
H7 (Large and small homes)  
E1 (Promoting a successful and inclusive Camden economy)  
E2 (Employment premises and sites)  
A1 (Managing the impact of development)  
A4 (Noise and vibration)  
D1 (Design)  
D2 (Heritage)  
CC1 (Climate change mitigation)  
T1 (Prioritising walking, cycling and public transport)  
T2 (Car-free development and limiting the availability of parking)  
T4 (Promoting the sustainable movement of goods and materials)  
DM1 (Delivery and monitoring)

Bloomsbury Conservation Area Appraisal and Management Strategy April 2011

**Site Constraints**

Archaeological Priority Area  
Grade II\* listed building  
Archaeological Priority Area – London Suburbs  
Bloomsbury Conservation Area  
Central London Area  
Underground development constraints – slope stability  
Underground development constraints – subterranean (groundwater) flow

**Relevant Planning History**

Previous to the recent permissions below there was no significant planning history for this property which suggests that the building has not been the subject of formal planning permission or listed building consent in relation to its use, or to any works that have been undertaken to the building. Notwithstanding the lack of recorded planning history, the use of the building has changed since its original single residence and a number of [insubstantial] associated works have been made both internally and externally.

**2014/6191/PRE:** A formal pre-application advice letter was issued on 20/03/2015. The advice sought was for the internal rearrangement of uses along with associated internal and external works. The changes of use were resisted in addition to a number of the alterations to the building.

**2015/3885/P and 2015/4560/L:** Planning permission and listed building consent were granted on 20/01/2016 for the demolition of the modern kitchenette in the rear courtyard; creation of a roof terrace; replacement of staircases to the basement at front and rear lightwells; addition of French doors in the west wall at basement level; relaying of clay tiles to the outer slope area of the roof and internal works including the 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.

Comment: Works to this highly significant grade II\* listed building were extensively discussed with Camden Council and Historic England (HE) under pre-application ref: 2014/6191/PRE and subsequent planning and listed building consent applications 2015/3885/P and 2016/4650/L. Some of the proposed works submitted for assessment as part of this pre-application have been subject to discussion previously. It is understood that the reason some issues are being revisited is due to the fact that the new architects have been *'appointed with the view to having a fresh look at the consented scheme, looking at where better opportunity lies to improve heritage benefits and where there is scope for further maximisation of the existing site and land uses'* (Pre-Application Planning Statement).

### **Site and Surroundings**

40 Great James Street has a very high level of significance, listed as grade II\*. It is a four storey terraced townhouse dating to the 1720s with 19<sup>th</sup> and 20<sup>th</sup> century extensions to the rear. The significance of the building is assessed in detail within the Heritage Statement prepared by Purcell (dated June 2015) to support applications 2015/3885/P and 2016/4650/L.

The building forms part of a larger terrace of 14 buildings on the western side of Great James Street. The site is located within the Bloomsbury Conservation Area and the accompanying Management Strategy states that the building, as well as the wider terrace, makes a positive contribution to the area.

The last known use of the building was offices (B1a) from basement to second floors, with residential flats (C3) occupying the third and fourth floors. It is not known exactly how the office space operated and the degree of self-containment of the residential units, given that each operation had shared use of the hallway and stairs. The existing presumed layout has permission to be retained under applications 2015/3885/P and 2016/4650/L. This existing layout of uses is therefore considered to be lawful.

### **Proposal**

The proposal is seeking to further modify the approvals granted recently under 2015/3885/P and 2016/4650/L. A number of external and internal works to the listed building are proposed along with the creation of a first floor level rear terrace and the amalgamation of two flats into a single unit. In summary the proposals include:

- Relocation of services and runs
- Amalgamation of the upper floor flats into a single unit
- Removal of an unoriginal stair within the basement
- Removal of basement slab and lowering of floor level
- Insertion of servicing rooms in the front vaults to house boiler and water tanks
- Demolition of wall at ground floor level above rear vaulted area and erection of a full width extension and winter garden area
- Demolition of bridged area to the rear at ground floor level, creation of terrace at first floor level
- Removal of unoriginal partition wall at second floor level
- Insertion of new door at second floor level for fire separation
- Formalisation of roof terrace at fourth floor level

- Insertion of air source heat pump (ASHP), underfloor heating to basement and trench heaters

The main issues of consideration covered by this response are:

- Land Use
- Design, Conservation and Heritage Impacts
- Amenity
- Transportation Considerations
- CIL

## **Land Use**

### Retention of office use

The proposal seeks to rationalise the space for the existing office (B1a) uses from basement to second floor. The principle of protecting and enhancing this space is generally accepted and in keeping with policy CS8 of the Council's adopted Local Development Framework (LDF) which seeks to ensure that the Borough retains a strong economy. Policy DP13 seeks to implement the priorities outlined in CS8 and states that the Council will retain land and buildings that are suitable for continued business use.

### Amalgamation of residential units

The existing building contains a 1 bed flat on the second floor and a 1 bed flat on the third floor. This lawful arrangement was formalised by permission references 2015/3885/P and 2016/4650/L and there was no objection to their retention. The current proposal is seeking to amalgamate the units into a 2 bed unit. The supporting planning letter states that the flat on the second floor was not developable or viable as it failed to have a designated kitchen.

Policy DP2 part (d) states that the Council will protect development that involves a net loss of residential floorspace and part (f) advises that developments involving the net loss of two or more homes will be resisted. The proposal would not involve the loss of any residential floorspace and only one unit would be lost. It would therefore comply with policy DP2. Furthermore, the resulting unit is considered to be of better quality given the second floor unit lacks comprehensive kitchen facilities. The proposal would be more in line with the Council's dwelling size priorities table under policy DP5 which gives 1 bed units a lower priority and 2 bed units a very high priority.

Overall, the proposed unit comfortably exceeds the floorspace requirements within the nationally described space standards and would provide a very generous sized triple aspect unit with large room sizes, a good layout and provision of sunlight/daylight/outlook along with a fourth floor level roof terrace to the rear.

## **Design Considerations and Impact on the Designated Heritage Assets**

The analysis on the impact of the listed building has been sent under different cover. This section has been broken up to address each proposal individually.

### Relocation of all servicing and runs from external boxing on rear façade and located internally behind adjusted existing joinery

The previously approved proposals included an external timber clad service riser at the rear of the closet wing. The demolition plans submitted with the current pre-application proposals indicate that at first to third floor levels, 3 large apertures were previously consented through the external wall. This is misleading as the approved plans do not indicate the size or location of new apertures at these levels, only at basement and ground floor plans. Details of all new service apertures was required by condition 9e), which has not yet been discharged.

The current proposals are to create an internal riser within the rear closet wing. This is problematic as it requires intervention to historic fabric through opening up sections of floors and ceilings, and alterations to the historic panelling at ground, first and second floor levels. It also changes the plan form within the closet wing. As a result this proposal is not supported due to the unacceptable and unjustified harm caused to the special interest of the grade II\* listed building.

The external accommodation of services, either through a clearly expressed modern service riser or through more traditional cast iron downpipes/SVPs is strongly preferable as it involves significantly less intervention to historic fabric as it only requires small openings within the rear wall and may be able to take advantage of existing service routes.

### Insertion of air source heat pump (ASHP), underfloor heating at basement level, boxed units under windows at ground and first floor levels, and trench heaters below windows at second and third floor levels

The need for the installation of an ASHP is questioned and insufficient justification has been provided as to why this system is the best solution for the building in sustainability and heritage terms. With limited improvements being made elsewhere to the building's air tightness and insulation (not possible due to the sensitivity of building fabric) ASHP may not function as efficiently as a gas boiler or other alternative heating systems and fan coil heating systems can be fairly inefficient compared to wet heating system. It is not clear why mechanical cooling is required to this building, and why adequate ventilation couldn't be provided through manual opening and closing of windows. The Council's Sustainability Officer may be able to provide further comments on sustainability issues.

The proposed installation of underfloor heating and underfloor serving at basement level, subject to confirmation of the existing flooring finishes throughout, is considered to be acceptable and not considered to harm the special interest of the building.

It has previously been advised that a traditional wet heating system with free-standing radiators would be the preferred solution for the main building in heritage terms as it negates the need for modern interventions such as the proposed boxed fan coil units at ground and first floor levels. No details have been provided of the proposed trench heating

at second and third floor levels other than that these will be located '*below the front windows and within the floor*'. As this heating system generally requires the installation of floor grilles it is not likely to be supported unless it can be demonstrated that there will be no impacts on historic floor structure or finishes.

Further details of the proposed electric mat heating located on top of existing floor boards and new heated towel rail within residential bathrooms would need to be provided as part of any formal application, including detailed section drawings at a minimum scale of 1:5.

#### Insertion of servicing rooms in the front vaults to house boiler and water tanks

Access to the front vaults has not been possible during site visits to the property due to a rat infestation. The Heritage Statement prepared by Purcell to support the proposals approved under 2015/3885/P and 2016/4650/L identifies that the north vault (B/01) has been modernised with a concrete floor and render to the walls, but that the south vault (B/02) remains untouched.

It is recommended that any changes to the existing vaults required to install boilers/water tanks or other services should be focussed on B/01, with B/02 left intact to reflect its historic character.

#### Lowering of floor within the basement

The proposed minor excavation at basement level, to provide an even floor level and increase the floor-ceiling height towards the rear of the property, is supported in principle as no historic wall finishes (skirting/architraves etc) would be affected. However, confirmation of the existing flooring finishes throughout the basement would be required to demonstrate that this proposal would not involve the loss of any historic fabric.

It is noted that due to the nature of these works that a Basement Impact Assessment would not be required as part of a formal planning application.

#### Amalgamation of two residential flats (Class C3) at second and third floor level to one residential flat (Class C3) and associated insertion of a new door at second floor level

The issue of achieving an acceptable level of fire and noise separation between the residential units and the communal stair to meet Building Regulations requirements was not discussed as part of the previously approved application.

The existing arrangement with separate units at second and third floor levels results in access to the two units being provided directly off the communal staircase. The current proposal for the second and third floors to be combined into a 2 bed unit requires the use of the staircase between the levels, as the installation of an additional staircase would cause an unacceptable level of harm to the historic building fabric.

It will be important to balance the need to satisfy Building Regulations requirements with any resultant impacts on the special interest of the grade II\* listed building, to ensure that the least harmful solution is reached. Only one option has been put forward as part of this pre-application to install a plasterboard fire-resistant partition with an additional fire-resistant door to the second floor landing and blocking off the existing door to the principle front room from the landing. This option is potentially reversible if the building were to be converted back to a single use in the future; however, the existing plan form and circulation would be negatively affected as part of the historic staircase would be covered

and fixings would be likely to be required to historic wall finishes within the stairwell. As a result some harm would be caused to the building's special interest. It will be necessary for all harm to be clearly and convincingly justified as part of any future application. The consideration of alternative ways of achieving an acceptable level of fireproofing is recommended. This includes the use of internal glazing, the use of fire curtains, sprinkler or mister systems. It is acknowledged that the Planning and Heritage Statement (p.8) indicates alternative options have been considered, but no details have been provided.

Complete demolition of bridged area to the rear at basement level and opening up into a winter garden area, and full demolition of existing full width rear extension and erection of new full width extension with roof terrace at first floor level extended to full width

The Heritage Statement prepared by Purcell (dated June 2015) identifies the entire basement footprint, including the rear vaults, as original fabric dating from the 1720s (p.18 & 26). Stone lintels within the small WC to the rear (B/10) and to one of the rear vaults (B/10) indicate that these rooms used to be a passage through to the rear vaults. The previously approved proposals retained the vaults to the front and rear of the property, with the removal of small areas of non-original blockwork partitioning. The current proposals include further demolition of the existing WC and small store (B/09 & B/10) to provide a larger courtyard at basement level with sliding glazed doors to the rear vaults.

The Planning and Heritage Statement Covering Letter (p.6-7) identifies the fabric proposed for removal at basement level as being of '*medium significance*' in line with the Purcell Heritage Statement. The justification provided to support the removal of this historic fabric is that it would enable '*the provision of a larger courtyard and a naturally lit rear room with a wide glazed aperture at basement and ground floors*' and that '*the walls in this area have been significantly altered and infilled over time and their appearance does not make a great contribution to the overall significance of the asset*'. This is not considered to be sufficient justification to support the proposed demolition.

External space is proposed through an increased first floor terrace. The removal of the later infilled areas and partition walls, as per the previously approved proposals, would restore the passage to its original function. No evidence has been provided to demonstrate that the walls have been significantly altered and such the proposed removal of this historic fabric is not supported as the harm caused is not considered to be outweighed by any heritage benefits.

The proposed glazed infill roof would be a lightweight modern addition and would internalise the existing courtyard at basement and ground floor levels as a winter garden, creating additional useable floorspace. Notwithstanding the above objection to the proposed demolition at basement level, the principle of the installation of a glazed roof over the rear basement/ground floor lightwell is generally considered to be acceptable.

The existing external amenity space at basement and ground floor levels is of poor quality. The justification provided within the Planning and Heritage Statement Covering Letter (p.7) that it would have a minimal impact on the fabric of the rear elevation (subject to further details) and its transparency would allow views of the rear elevations from within the courtyard is generally accepted.



The previously approved design of windows to the rear elevation is altered within the revised proposals to accommodate the connection of the mono-pitched glazed roof above the lintel of the window on the landing between ground and first floor levels and below the sill of the rear window at first floor levels. The Purcell Heritage Statement claims that the window designs subsequently approved were returning the rear elevation to its 'original pattern'. No commentary on this issue has been provided with the current pre-application proposal; however, it should be ensured that historically accurate proportions of apertures and glazing bars are accommodated within the restored rear elevation.

The proposals would demolish 19<sup>th</sup> century extensions at ground floor level (removing rooms G/04, G/05 & G/06). While this would affect mid-late 19<sup>th</sup> century historic fabric, it is considered that its loss could, on balance, be justified within a subsequent application for listed building consent subject to heritage benefits being achieved elsewhere. The revised proposal for a larger meeting room to the rear of the building, extending the full width the site, would increase the amount of usable floorspace. Despite this, the revised proposals would result in less natural light being provided to the courtyard at basement level when compared with the previously approved plans.

The proposed timber boundary fence to the terrace is not considered to be acceptable, and a more sensitive boundary treatment/means of achieving privacy should be considered through the use of planters or railings.

It is also considered that access to the proposed rear terrace could be provided in a more sensitive way. The proposals show a glazed stairwell projecting from the proposed extension directly abutting the rear elevation of the closet wing. It would be preferable for access to be provided through a hatch system, or similar, so that the proposed additional massing does not significantly project above ground floor level.

#### Removal of internal unoriginal stair from ground to basement level

The basement floor has been considerably altered from the original plan form through the removal of partitioning. The existing staircase is a modern replacement, although it is positioned in its historic location.

The conclusion on p.7 of the Planning & Heritage Statement submitted to support the pre-application proposals that the removal of the internal stair from basement to ground floor '*will constitute a heritage benefit*' as it will improve '*space and flow*' is not accepted. The previously approved layout involved the reinstatement of partition walls around a replacement staircase, reinstating some of the lost plan form and division of space, therefore constituting a heritage benefit. The current proposals to remove the staircase completely are unacceptable due to the harm caused to the plan form and it is strongly advised that this issue is revisited. It is recommended that the previously proposed partition walls around the staircase should be retained within the current proposals and that further opportunities to reference the original plan form be considered.

#### Insertion and relocation of a new rear spiral staircase

There is no objection to the proposed replacement of the existing spiral staircase, subject to further details.

#### Removal of unoriginal partition wall in rear room at second floor level

The Heritage Statement prepared by Purcell (dated June 2015) does not identify the partition wall between 2/02 and 2/03 as a non-original partition wall. No further assessment has been provided within the Planning and Heritage Statement Covering Letter. Further justification is required to demonstrate that this is a non-original partition wall.

#### Removal of ceiling joists and finish at third floor level

The proposed removal of ceiling joists and finishes at third floor level to heighten the space in this area is not supported due to the impact on the modest spatial characteristics of this space. While the spaces are not principal rooms within the building, their lower floor to ceiling height and restrained and simple treatment and finishes reflects the spatial hierarchy of the building and contributes towards the building's special interest.

#### **Amenity**

The impact on the amenity of surrounding residential occupiers will need to be duly considered if a formal planning application is submitted. The host building is surrounded by a number of residential flats on all sides including buildings fronting Great James Street, Emerald Street and Theobolds Road. Any planning submission would need to include detailed analysis and commentary as to whether any habitable living or amenity spaces are impacted by the development.

#### Outlook/sunlight/daylight

The proposals at lower ground and ground floor are not materially larger than the existing level of development to the rear. The structure most likely to cause impact on amenity is the first floor level 'glazed box' element due to its proximity to habitable windows of residential units on Theobolds Road. The significance of this impact should be explored with any eventual formal planning submission. At present Officers are concerned with this element's proximity to habitable windows, demonstrated in the images below:



**Figure 1 (above):** Habitable window of residential unit on Theobolds Road (in red circle) looking towards the location of the first floor rear glazed element.



**Figure 2 (above):** Habitable windows of residential units on Theobolds Road (in red circle) looking towards the location of the first floor rear glazed element.

#### Overlooking/privacy

A fourth floor terrace would be retained to be used by the amalgamated residential unit. Given that this terrace is established historically and formalised via planning application 2015/3885/P, there is no objection to it remaining. Efforts should be made through any formal submission to reduce opportunities for overlooking through the use of soft landscaping (for example planters near the rear parapet).

A first floor level terrace is proposed and this is substantially extended beyond that approved under 2015/3885/P. As part of any formal planning submission details and

commentary would need to be submitted to assess whether there would be any overlooking impacts. Details of any screening would be expected. Subject to the terrace being acceptable a condition would be required in the event of a planning approval to restrict its use to commercial tenants (B1a) within the building only.

#### Noise/general disturbance

ASHP has been proposed. The acceptability and need for mechanical ventilation is going to be difficult to justify in conservation and sustainability terms (see comments above). Notwithstanding this, any submission would need to be supported by a Noise Impact Assessment by a qualified Acoustic Engineer using the criteria within policy DP28.

### **Transportation Considerations**

#### Cycle parking

No cycle parking details have been submitted as part of the scheme. Although the application does not involve a significant uplift in floorspace and the residential units are being amalgamated, the inclusion of cycle parking is highly encouraged. These will need to be designed in accordance with CPG7 (Transport), downloaded [here](#), which provides details on the design and layout that Camden expects for cycle parking.

#### Construction Management Plan (CMP)

Given the nature of the development and that the extant permission - which is of a similar scale and character – did not include a CMP, it is not considered that a CMP would be required for the level of development proposed.

#### Highways contribution

The summary page of policy DP21 states that ‘The Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development’. The works are largely internal with modest external alterations to the rear. As per the extant permission a highways contribution is unlikely to be sought.

#### Car-free housing

The site has a Public Transport Accessibility Level of Level 6A (Excellent) and is located within a Controlled Parking Zone (CPZ). It is noted that the site has two existing residences that could apply for parking permits and that the proposal would reduce the number of units to one. CPG7 (Transport) states, in para 5.19, that existing parking rights can normally be retained on development sites where it can be demonstrated that existing occupiers are to return to the address when it is completed. Para 5.20 goes on to state that if a development is to have new occupiers, existing parking rights will not apply, and the Council will apply its car-free/car-capped policies as set out in Development Policies DP18 and DP19. Any proposal would have to demonstrate that the existing occupier will occupy the development once completed, otherwise a section 106 legal agreement would be required to secure car-free housing.

### **CIL**

The proposal by its size and land use type might be liable for the London Borough of Camden’s Community Infrastructure Levy (CIL) introduced on the 1<sup>st</sup> April 2015 to help pay for local infrastructure and the Mayoral CIL which helps fund Crossrail introduced on 1st April 2012. Further details on CIL and how it is charged can be found on our website:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/community-infrastructure-levy/>

### **Planning application process and supporting information**

In the event of submitting a full planning application, please ensure that you submit all the required information in accordance with the validation checklist, details of which can be obtained from the council's website:

<http://camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application>.

In order to ensure your application is valid, the following information will be required to support the planning application:

- Completed and signed planning application forms for Full Planning Permission and Listed Building Consent
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red;
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Design and Access Statement
- Heritage Statement
- Planning Statement;
- Noise Impact Assessment
- The appropriate fee – (dependant on level of floorspace proposed)

### **Conclusion**

As outlined above, the Council has a number of significant concerns with the proposal and how it would impact on the grade II\* listed building. In addition, there are amenity concerns which should be explored.

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision.

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me by telephone on 020 7974 4908.

Yours sincerely,

Jonathan McClue  
Principal Planning Officer  
Planning Solutions Team

## **A5. HISTORIC ENGLAND PRE-APPLICATION WRITTEN RESPONSE**





Historic England

LONDON OFFICE

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London  
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Direct Dial: 020 7973 3763

Our ref: PA00464955

17 January 2017

Dear Ms Shelley

### **Pre-application Advice**

#### **40 GREAT JAMES STREET, CAMDEN, LONDON, WC1N 3HB**

Thank you for contacting Historic England last month regarding pre-application proposals for the Grade II\* listed 40 Great James Street in Bloomsbury. It was a pleasure meeting you and the development team at our site visit last Wednesday.

As you know, both my colleague Claire Brady and I have had been involved in discussions regarding proposals for this highly significant and largely intact London terrace house, and these current plans seek various changes to the approved scheme. I set out below our key areas of interest and recommendations which I hope you will find helpful.

#### Service Runs

As part of these proposals, it is proposed to accommodate the service runs within the closet wing. This would involve relocating sections of joinery, and boxing in the serving which would result in a change to the room proportions throughout. The new openings to create the service void would also require the removal of historic fabric at each floor level, although it is understood that no floor joists would be disturbed.

The historic floor plan is unusual, particularly the positioning of the rear chimney stack, and the projecting nib in the closet wing which appears to relate to the neighbouring external wall. We would therefore conclude that the small projection into the closet wing space to accommodate the service runs would not significantly impact on the room proportions. However, the removal of historic fabric throughout to accommodate the service void, and the relocating of historic panelling and cornicing would, in our view, cause some harm to the historic and aesthetic values of the listed building.

The rear elevation has undergone various changes over the years, and is hidden from public views due to the large scale of the buildings along Emerald Street. We



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therefore consider that a service stack, as approved, would be a more sensitive solution for this particular listed building. If the internal servicing is pursued further, 'clear and convincing justification' should be provided with the application for this change to the approved scheme, in accordance with Paragraph 132 of the National Planning Policy Framework (NPPF).

Air Conditioning / Heating Systems

An air sourced heating system is proposed as an alternative to a conventional central heating system. Within the office space, ASHP units are to be located below the windows and boxed in with panelling to match the existing. A trench heating system is proposed for the front rooms of the residential accommodation, involving the removal of sections of floor boards below the windows.

Whilst we have no in principle objection to the installation of an ASHP system in this building, we consider that the concealing of the ASHP units and blending with new joinery would compromise the authenticity of the historic panelling and impact negatively on the proportions of the highly significant front rooms at ground and first floor. We would strongly advise that any proposed concealing of the units should not attempt to blend in with the historic joinery. Perhaps the units could be disguised as freestanding pieces of furniture.

Regarding the heating system for the residential flat, the desire to minimise the appearance of the heating units is welcomed. However, the removal of historic fabric required is undesirable. As part of your justification, it would be helpful to understand whether alternative discrete floor mounted units are available, as well as the extent of fabric required to accommodate the trench system.

Rear Alterations and Extension

As previously mentioned, the incremental alterations and extensions to the rear elevation, and large-scale developments along Emerald Street have compromised the integrity and setting of the rear parts of 40 Great James Street. We therefore have no significant concerns with the proposed glazing over of the rear lightwell to create a winter garden.

This intervention would involve the demolition of two vaults to the rear and the bridge link above. On the basis of our site inspection, it would appear that these vaults have been unsympathetically altered. With this in mind, and on the understanding that the remaining vaults to the rear will be retained and revealed, we consider a case could be made for the proposed demolition. Prior to any approved demolition, we would recommend that a photographic record is undertaken.

Basement Alterations



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Although the basement has been much altered, its contribution to the overall plan form of the building remains legible due to the presence of the modern staircase, which is located in the position of the original. Therefore, whilst we have no objection to the proposed demolition of the staircase, we recommend that some connectivity to the ground floor remains in this location, potentially by installing a retractable staircase.

### Partitioning to the Staircase

The scheme involves the installation of a new door and glazed screen within the stairwell at second floor level to comply with fire regulations. This intervention would be harmful to the plan form of the building and to the aesthetic value of the original staircase in our opinion. In accordance with Paragraph 132 of the NPPF, clear and convincing justification for this intervention is required. This should include a precedent for this intervention in other Grade II\* listed terraced houses. We also recommend that you engage in discussions with the Local Authority's Building Control Officer. If the principle of the screen is accepted, the harm will need to be weighed against the public benefits of the scheme in accordance with Paragraph 134 of the NPPF. We would also recommend that samples of the proposed materials are provided at an early stage. It would also be helpful to understand the full fire strategy for the building, including any changes to doors and other joinery.

### Opening up of Roof Void

It is also proposed to improve the floor to ceiling height within the front room at third floor level. This would involve removing the timbers between the third floor and roof void to create a lofty double-height space. Whilst we acknowledge the restricted head height, this intervention would impact on the considered hierarchical proportions of the terrace house. Again, it would be helpful if comparative examples could be provided to support this element of the proposals. We also recommend that a timber survey of the joists to be removed is provided to determine what original fabric remains. If it can be demonstrated that the work would result in minimal disruption to the original roof timbers, we would be open to further discussions regarding this element of the scheme.

### **Next Steps**

I hope this advice is helpful, and I would be happy to provide further pre-application advice once the issues set out in this letter have been addressed. In the meantime, please do contact me if you require clarification on any of the points raised.

Yours sincerely



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## **A6. PRE-APPLICATION RESPONSE SCHEDULE**

LB Camden	Historic England	Our response
Land Use		
<p><b>Office (Class B1)</b></p> <ul style="list-style-type: none"> <li>The principle of protecting and enhancing the office space is accepted.</li> </ul> <p><b>Residential (Class C3)</b></p> <ul style="list-style-type: none"> <li>Amalgamation of both 1 bedroom flats at second and third floor level respectively is considered acceptable. The proposal would not involve the loss of any residential floorspace and only one unit would be lost. The proposal is considered to be more in line with the Council's dwelling size priorities table under policy DP5 giving 2 bedroom flats a very high priority.</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>Full Justification regarding amalgamation of both residential flats is outlined within section 7 of this statement.</li> </ul>
Relocation of all servicing and runs from external boxing on rear façade and located internally behind adjusted existing joinery		
<ul style="list-style-type: none"> <li>Creation of an internal riser within the rear closet wing is considered problematic as it requires intervention to historic fabric through opening up sections of floors and ceilings and changes the plan form within the closet wing. External accommodation of services, either through a clearly expressed modern service riser or through more traditional cast iron downpipes is strongly preferable.</li> </ul>	<ul style="list-style-type: none"> <li>If the internal servicing is pursued further, '<i>clear and convincing justification</i>' should be provided with the application for this change to the approved scheme, in accordance with Paragraph 132 of the National Planning Policy Framework (NPPF).</li> </ul>	<ul style="list-style-type: none"> <li>Full justification regarding the relocation of services outlined in this statement with detailed heritage justification outlined within the accompanying heritage statement.</li> <li>It is proposed to locate servicing in front of existing panelling and behind new false panelling.</li> </ul>

LB Camden	Historic England	Our response
<b>Insertion of servicing rooms in the front vaults to house boiler and water tanks</b>		
<ul style="list-style-type: none"> <li>It is recommended that any changes to the existing vaults required to install boilers/water tanks or other services should be focused on B/01, with B/02 left intact to reflect its historic character.</li> <li>Under recent planning consent, B/01 was demonstrated to have undergone modern intervention.</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>It is proposed to utilise the north vault (B/01) to house servicing units.</li> <li>In addition, given the limitations to space it is proposed to utilise the south vault (B/02) to house water tank. York floor slab will be inserted where the water tank will sit. Plant inserted within B/02 is of external grade. Full detailed justification of this is set out in the accompanying heritage statement.</li> </ul>
<b>Insertion of air source heat pump (ASHP), underfloor heating at basement level, boxed units under windows at ground and first floor levels, and trench heaters below windows at second and third floor levels</b>		
<ul style="list-style-type: none"> <li>The need for the installation of ASHP is questioned and insufficient justification has been provided as to why this system is the best solution for the building in sustainability and heritage terms.</li> <li>The proposed installation of underfloor heating and underfloor servicing at basement level is considered acceptable.</li> <li>No details have been provided of the proposed trench heating at second and third floor levels. As the heating system requires the installation of floor grilles it is not likely to be supported unless it can be demonstrated that there will be no impacts on historic floor structure or finishes.</li> </ul>	<ul style="list-style-type: none"> <li>There is no principle objection to the installation of an ASHP system. It is strongly advised that the units should not be concealed and should not attempt to blend in with the historic joinery.</li> <li>Regarding the heating system for the residential flat, the desire to minimise the appearance of the heating units is welcomed. However, the removal of historic fabric required is undesirable.</li> </ul>	<ul style="list-style-type: none"> <li>Full justification regarding the need for ASHP is outlined within this statement and accompanying heritage statement. Locations of units and trench heaters are shown in accompanying drawings, prepared by Emrys.</li> </ul>

LB Camden	Historic England	Our response
<b>Amalgamation of two residential flats (Class C3) at second and third floor level to one residential flat (Class C3) and associated insertion of a new door at second floor level</b>		
<ul style="list-style-type: none"> <li>• Amalgamation of both residential flats considered acceptable in earlier land use table above.</li> <li>• Only one option has been put forward as part of this pre-application to install a plasterboard fire-resistant partition with an additional fire-resistant door to the second floor landing and blocking off the existing door to the principle front room from the landing. The option is potentially reversible if the building were to be converted back to a single use in the future; however, the existing plan form and circulation would be negatively affected as part of the historic staircase would be covered.</li> <li>• The consideration of alternative ways of achieving an acceptable level of fire proofing is recommended. This includes the use of internal glazing, the use of fire curtains, sprinkler or mister systems.</li> </ul>	<ul style="list-style-type: none"> <li>• No comment regarding amalgamation of two residential flats.</li> <li>• The scheme involves the installation of a new door and glazed screen within the stairwell at second floor level to comply with fire regulations. This intervention would be harmful to the plan form of the building and to the aesthetic value of the original staircase in our opinion.</li> </ul>	<ul style="list-style-type: none"> <li>• Fire screen is proposed to be glazed in order to maintain light flows as well as maintaining plan form legibility. Full detail and justification regarding the insertion of a new door at second floor level landing is outlined in this statement and accompanying heritage statement.</li> <li>• In addition to the fire screen, an imist system is proposed as part of this application. This enabling the building complies fully with Building Regulations requirements.</li> </ul>
<b>Complete demolition of bridged area to the rear at basement level and opening up into a winter garden area, and full demolition of existing full width rear extension and erection of new full width extension with roof terrace at first floor level extended to full width</b>		
<ul style="list-style-type: none"> <li>• There is not considered enough justification to support the proposed demolition of the fabric at basement level. No evidence has been provided to demonstrate that the walls have been significantly altered and such the proposed removal of this historic fabric is not supported as the harm caused is not considered to be outweighed by nay heritage benefits.</li> <li>• The principle of the installation of a glazed roof over the rear basement/ground floor lightwell is generally considered to be acceptable. It is also considered that access to the proposed rear terrace could be provided in a more sensitive way</li> </ul>	<ul style="list-style-type: none"> <li>• There are no significant concerns with the proposed glazing over of the rear lightwell to create a winter garden.</li> <li>• The proposed intervention would involve the demolition of two vaults to the rear and bridge link above. It is considered from site inspection that the vaults have been unsympathetically altered. Subject to the retention and revealing of the remaining vaults it is considered that a case could be made for the proposed demolition.</li> </ul>	<ul style="list-style-type: none"> <li>• It has been noted that much of the original historic fabric in this location has been significantly altered. As such, full and detailed justification for the demolition is outlined within this statement and accompanying heritage statement.</li> </ul>

LB Camden	Historic England	Our response
<b>Removal of internal unoriginal stair from ground to basement level</b>		
<ul style="list-style-type: none"> <li>The current proposals to remove the staircase completely are unacceptable due to the harm caused to the plan form. It is recommended that the previously proposed partition walls around the staircase should be retained within the current proposals and that further opportunities to reference the original plan form be considered.</li> </ul>	<ul style="list-style-type: none"> <li>The removal of the staircase is considered acceptable and it is recommended that some connectivity to the ground floor remains in its location, potentially by installing a retractable staircase.</li> </ul>	<ul style="list-style-type: none"> <li>The application proposals seek to remove and replace the stair.</li> </ul>
<b>Amenity</b>		
<ul style="list-style-type: none"> <li>Any planning submission would need to include detailed analysis and commentary as to whether any habitable living or amenity spaces are impacted by the development.</li> <li>The structure most likely to cause impact on amenity is the first floor level 'glazed box' due to its proximity to habitable windows of residential units on Theobalds Road.</li> <li>Details and commentary would be required to assess whether there would be any overlooking impacts from the extended first floor roof terrace. Subject to the terrace being acceptable a condition would be required in the event of a planning approval to restrict its use to commercial tenants (B1a) within the building only.</li> <li>ASHP has been proposed. A Noise Impact Assessment would be required to assess any impacts from noise emission.</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>In order to respond to comments regarding size and massing, the glazed box enclosing proposed stair to rear terrace has been redesigned to reduce the size and massing and include a sloped roof rather than a full box shape. Furthermore, the enclosed stair and glazed box have been relocated away from the boundary wall to mitigate any potential impacts on amenity.</li> <li>A noise impact assessment is submitted in support of this application.</li> </ul>

LB Camden	Historic England	Our response
Transport		
<ul style="list-style-type: none"> <li>• The inclusion of cycle parking is highly encouraged.</li> <li>• It is noted that the site has two existing residences that could apply for parking permits and that the proposal would reduce the number of units to one. In order to apply for a parking permit, any proposal would have to demonstrate that the existing occupier will occupy the development once completed.</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	<ul style="list-style-type: none"> <li>• The scheme includes provision of cycle parking storage in line with Camden's planning policy.</li> </ul>