



Historic England

LONDON OFFICE

Mr Jonathan McClue
London Borough of Camden
Town Hall
Argyle Street
London
WC1H 8ND

Direct Dial: 020 7973 3763

Our ref: L00565853

25 April 2017

Dear Mr McClue

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015
40 GREAT JAMES STREET , LONDON WC1N 3HB
Application No 2017/1789/L (Listed Building Consent)
2017/1704/P (Planning Permission)**

Thank you for your letter of 29 March 2017 notifying Historic England of the applications for listed building consent and planning permission relating to the above site.

In our pre-application advice to the Agent (attached for your information), we raised various concerns about the proposed redevelopment of the Grade II* listed 40 Great James Street. We are pleased to see that some of these issues have been addressed in the submission, in particular the retention of the approved staircase to basement level, and the replacement of the proposed built in joinery to accommodate the fan coil units with freestanding furniture. However, we have a number of outstanding concerns and I outline these below.

Opening up of the Roof Void

It is proposed to improve the floor to ceiling height within the southerly front room at third floor level by removing the ceiling and joists and exposing the roof timbers. We are pleased to see that further information on the significance and condition of the timbers, and examples of similar proposals, have been provided as we requested at pre-application stage. It has been concluded that a high percentage of the timbers to be removed are original, and there was clear evidence of original carpentry joints to many of the joists at our site visit on the 24 April.

The examples that have been provided, namely the joist removal to the Grade II listed Arts and Crafts building on Drury Lane, and to an unlisted building in Brent, although helpful are not, in our opinion, comparable to the removal of 1720s timbers to a Grade II* listed terraced house. Therefore due to the high significance of the existing timbers, and the absence of clear and convincing justification for their removal, Historic England is unable to support this element of the scheme.



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Service Riser

We acknowledge that the closet wing has unusual proportions, and offers a recess to neatly accommodate an internal service riser. Nonetheless, on the basis of the submitted information and recent site visit, we remain concerned about the proposed localised removal of historic floorboards, lath and plaster, and in particular the concealing of original panelling in order to accommodate the service void.

As set out in our pre-application response, clear and convincing justification (as per Paragraph 132 of the NPPF) should be provided if this option is to be explored further. The submitted justification concludes that an internal service riser would have less impact on historic fabric and less visual impact compared to the approved external service route (Heritage Justification and Impact Assessment, Paragraph 3.7). However, it was clear from our site visit that the rear elevation of the closet wing has been extensively rebuilt. Additionally, we understand that the services for an external stack could be distributed to the rear beneath floor levels thereby avoiding physical impact to significant fabric. We therefore consider, on balance, that an external stack would be less harmful, in heritage terms, than an internal service riser as proposed, and there is precedent along the Grade II* listed terrace for such an approach.

Trench Heaters

The application includes the installation of trench heaters to the residential floors. Whilst we continue to recognise the benefits in concealing the heaters below floor level, the alterations to the floorboards remains a sensitive issue. Further information on their significance has been provided as we recommended. On the basis of the submitted information and our recent site visit, it appears that most of the boards to be altered are original.

However, as set out in the supporting information, the boards at third floor level have already been subject to alteration, shortening, and lifting. We therefore have no significant concerns with the proposed alterations at third floor level. Conversely, the boards at second floor are relatively intact, although some alteration is apparent at the far end (west end) of the room. We suggest that options are explored to accommodate the trench heaters in this location which would reduce the harm to the historic fabric.

Partitioning to the Staircase

Historic England maintains that some harm would result from the installation of glazed partitioning along the staircase to second floor level. However, we understand that the work would be reversible and sensitive to the historic fabric, and we recognise the clear benefits from a fire mitigation perspective. We therefore consider that a case could be made for this intervention, subject to further discussions regarding the detailed design with your Council's Conservation Officer and Building Control Officer.





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Recommendation

Historic England is encouraged by some of the positive changes that have been made since our pre-application involvement, and we welcome the heritage benefits of the scheme such as the external improvements and restoration of the highly significant joinery throughout. We consider that such benefits can help to mitigate some of the more harmful aspects of this scheme, as is required under Paragraph 134 of the NPPF. However, we feel that certain harmful elements, in particular the removal of original joists at third floor level, and the internal service riser, have not been fully supported by clear and convincing justification, which is a requirement under Paragraph 132 of the NPPF.

We are therefore currently unable to support this application. However, should these key issues be addressed, we would be minded to direct as to the granting of listed building consent. Please consult us again if any additional information or amendments are submitted.

Please note that this response related to historic building matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3735).

Yours sincerely

Alasdair Young

Inspector of Historic Buildings and Areas

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cc Sarah Freeman, London Borough of Camden



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