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**F.A.O Ms Sarah Freeman and Mr Jonathan McClue**

15<sup>th</sup> May 2017

Our Reference: 15/089  
VIA EMAIL

Dear Ms Freeman and Mr McClue,

**PLANNING AND HERITAGE RESPONSE – 2017/1704/P AND 2017/1789/L  
40 GREAT JAMES STREET, LONDON, WC1N 3HB**

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We write in response to comments received from the London Borough of Camden relating to application references. 2017/1704/P and 2017/1789/L for proposed works at 40 Great James Street London WC1N 3HB.

This letter is set out to respond directly to comments received from Mr Jonathan McClue via email on 28<sup>th</sup> April 2017 and includes additional drawings, plans and commentary to support our responses from a planning and heritage perspective. These are referenced throughout and can be viewed in the documents accompanying this letter via email.

**a. Response**

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Each point made in your email of 28<sup>th</sup> April is addressed in turn below:

**Staircase between Ground Floor and Basement**

This element of works is considered acceptable. Further detail is required, however it has been suggested that, due to the significance and priority of other areas of outstanding information in the wider application that this detail is best dealt with under condition.

**Fan Coil Units at Ground and First Floor Levels**

The proposed freestanding units at ground and first floor levels are considered acceptable. It is understood that further detail is required relating to the openings required within floorboards. However again, due to the priority of other outstanding details, it is considered that this detail is best dealt with under condition.

### Glazed Roof over the Existing Basement Lightwell

Whilst this element of works is considered acceptable, further detail has been requested relating to the rear elevation and how the proposed glass plate would sit within the rear façade. Further detail has been provided within accompanying drawing numbers 1618-0300-AP-004 and 1618-0400-AP-001 prepared by Emrys. Where detailed design is required, due to other priority details taking precedence, it is considered that any additional detail is best dealt with under condition.

### Fire Safety/Partitioning at Second Floor Level

Whilst the principle of the installation of the glazed partition/door at second floor level is accepted, further detail has been requested to demonstrate the exact installation details. Further detail relating to the location of the fire screen/door in relation to the existing staircase and doorway to the front room has been included on drawing number 1618-SK-015, prepared by Emrys. It is considered that any additional detail required is best dealt with under condition.

### Service Riser

Within the current submission, the proposal is to relocate the approved external service riser to internal and behind false panelling. Camden and Historic England consider this unacceptable and remain in favour of an externally located service riser. This is largely due to their conclusion on site that the rear elevation of the closet wing was extensively rebuilt. However, we must stress that there is no internal or external fabric or wider planning evidence to support this suggestion, and we instead find that the brickwork of the closet wing has simply been cleaned and repointed, which has resulted in the identified difference in appearance compared to the wider elevation. It is therefore our strong view that the alteration of the external elevation of the closet wing would still cause harm to the significance of the building and should be weighed accordingly by Camden and Historic England in considering this issue.

Further detail relating to the levels of historic fabric which would be lost via either the internal or external approach has been submitted within the accompanying updated design and access statement, prepared by Emrys. Photographs at section 3.4.3 provide a comparable of both approaches and indicate the levels of historic fabric which is considered required for removal within each approach.

In addition, drawing number 1619-SK-019 provides a clear indication as to the levels of intervention required for each approach to the location of the service riser. Overall, it is clear that the approach to locate the service riser internally is substantially less harmful than if the service riser were to be located externally; and, further, **it should be made clear here that there is no alternative agenda in proposing the internal service riser solution beyond the focus of the whole team on minimising the degree of harm to the fabric of the historic building from this element.**

It is clear from drawing number 1619-SK-019 in particular that locating the service riser internally results in less intervention to original historic fabric overall. Locating the service riser internally would result in the joists and wall plate remaining untouched. In comparison, locating the service riser externally would result in joists, wall edges and floorboards requiring cutting. Therefore on balance, it

is considered that locating the service riser internally, results in less harm overall than the approach for an external service riser.

### **Removal of Ceiling Joists**

Due to the impact upon the modest spatial characteristics of this area at third floor level as well as the hierarchy of spaces within the building, both Camden and Historic England consider this element of work unsupportable. This has been discussed further with our client and within the consultant team. It has been agreed that this proposal will no longer be pursued.

### **Trench Heaters**

This element of work is proposed only at second and third floor levels. Whilst it is accepted at third floor level that the installation of trench heaters would not involve the loss of any significant historic fabric, Camden and Historic England both feel that the intervention at second floor level would result in a significant loss of fabric.

In responding to this comment, it seems the main concerns from Camden and Historic England relate to the floorboards within the front room and in particular towards the building's front elevation, as the floorboards to the rear room of the second floor have been significantly damaged in the proposed trench heater location by historic water ingress.

Discussions were had with Historic England and Camden on Site on 20<sup>th</sup> April regarding the possibility of locating the front room trench heaters elsewhere. There it was highlighted that locating the front room trench heaters to other wall locations would be problematic in restricting the use of the area of wall to which they were sited; this is particularly so in the light of there being only two walls that are usable in the light of there being a fireplace to the south wall and two windows to the east wall. It was also suggested during this meeting that, due to significant damage to floorboards to the west side of the front room, floorboards could be moved back from the east end of the room to prevent the need to cut these boards to accommodate the trench heaters; discussions with the wider project team including the foreman have confirmed that this will be achievable without further damage to the boards.

Since the receipt of Camden's email of 28<sup>th</sup> April, further project team discussions have also confirmed that the east side of the room is the only viable option for the trench heater location. In mechanical terms, heaters are best located beneath windows as this provides the air flow requisite for their function, which therefore suggests that the west side of the room is an impractical location in mechanical terms. The north side of the room is also not suitable as it would involve the trimming of joists to site the trench heaters. The south side is unsuitable because of the fireplace against most of this wall.

We therefore consider that this additional consideration provides further justification of the proposed trench heater locations to the east side of the second floor front room; and we would also particularly like to emphasise that this further analysis has identified a way to avoid any degree of fabric loss through the moving back of boards that have been damaged at their western ends, and which

otherwise have been moved and altered during successive phases of change over the Site's history. It is therefore concluded that there will be minimal if any harm arising from this proposal following this final amendment, and as such the concerns raised by Camden and Historic England on this point are considered to be addressed in a clear and robust way.

#### **Demolition of Rear Bridged Area/Section of Rear Vaults**

Taking the wider scheme into account and with a view to the degree of change experienced in this location, the principle of the demolition of this area has been established to be acceptable during pre-application discussions with Camden and Historic England. However, in assessing the full application the extent of demolition was considered by Camden to be unacceptable, although the broader principle was again accepted. Camden have requested that the external wall between the larger rear vault and the lightwell be retained. This has been discussed with our client and within the consultant team and it has been agreed that this wall shall be retained.

Supporting information has been submitted within the accompanying drawings, reference numbers 1618-0200-AP-001, 1618-0300-APA-001, 1618-0300-AP-003 and 1618-0170-AP-001.

#### **Windows to the Rear Elevation**

Information has been submitted to show the amended window design and to illustrate where the proposed glazed rooflight will sit within the rear façade. Please refer to accompanying drawing numbers 1618-0400-AP-001 and 1618-0300-AP-004, prepared by Emrys for further detail.

It is of preliminary note that, although the Purcell report states that the approved scheme will be returning this elevation to its primary appearance, there is no fabric or documentary evidence to confirm this view; and it is therefore considered that the form of the approved scheme is a reasonable and educated assumption rather an academic reinstatement of the lost form here.

Beyond this, following Camden's comments on the reinstated fenestration to the rear elevation, there has been a review of the proposed design for this element and some minor amendments have been made to bring the proposed sill and lintel heights and forms into line with the previously consented scheme.

The sole area where there is some variation from the approved scheme is the slight curtailment of the staircase window between ground and first floor, where the sill and window heights and forms have been retained, but a small part of the top of this aperture is required to be infilled with brickwork to receive the lead flashing for the new rooflight.

As this will be to an area of existing modern intervention, it is judged that this will result in negligible harm to the heritage significance of the building, and that any small degree of harm arising from this otherwise will be mitigated by the articulation of the sill and lintel heights as a 'memory' of what may have been the primary window form.

Flashing for the remaining part of the rooflight will also result in minimal fabric impact, being concentrated to an area of pointing and requiring minimal alterations to the wider brickwork for its installation. It is therefore considered that this element too will result in negligible heritage impact in fabric terms overall.

## **b. Conclusion**

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To conclude, it is considered that the additional documentation and minor scheme amendments submitted herein are considered to address robustly and clearly the objections raised by Camden and Historic England in their initial comments, and to justify, address, or eliminate each concern raised.

Further, as previously stated, when taking the scheme as a whole, it is evident that the cumulative improvements resulting from the proposed development would result in significant enhancements to this Grade II\*-listed building and the wider Conservation Area, as well as securing its optimum viable use for the longer term.

We trust that the above and the attached information are sufficient in resolving any outstanding objections which may result from the proposed scheme, but we would also like to arrange a Site visit for all parties to ensure that justifications – especially regarding the services option – have been understood fully. As stated above, in common with Camden and Historic England, we as a client and project team want to implement a scheme that minimises harm to the building and delivers significant heritage benefits, and we feel very strongly that this scheme will do just that.

Should there be any further queries relating to the application proposals, please do not hesitate to contact us, and we will be in touch separately to arrange a further Site visit.

Kind regards,

ICENI PROJECTS LTD