

Gideon Whittingham
Senior Planning Officer
Regeneration & Planning
Supporting Communities
London Borough of Camden.

6th June 2017

RE: 39 Great James St – Application 2016/5824/P and 2016/6155/L

Dear Gideon,

Following our submission of revised plans to Charles Rose on the 18th May (125 DOC B14), I am writing in response to your email dated 9th March, which requested additional information and clarification on a number of elements of the proposals. Each of your points is addressed individually below and in the revised plans, key sections and sketches enclosed.

Quality of Accommodation.

Following queries raised by Camden on the daylight levels and outlook from Room RB-3, this room has now been re-designated. Please see drawing 125 P 00 Rev B.

Room RB-2 is retained as a bedroom, on the grounds that the following buildings have obtained approval for bedrooms in the equivalent basement location:

- No. 15 Greta James Street (2013/3117/P)
- No. 14 Great James Street (2013/3114/P)
- No. 28 Great James Street (2014/2956/P)
- No 30 Great James Street (2014/4419/P)

Compliance with Policy DP13 – Employment premises and sites.

The proposals include an application for the change of use from mixed commercial (B1) space (on basement and lower ground level) and residential accommodation (of first, second and third floor) to a single family dwelling house.

Retaining the existing designation of commercial and mixed use is considered unsuitable on the following grounds:

- The building is vacant and has not been utilised as a commercial space for over two decades. The change of use will therefore have no impact on existing local employment.
- The present vacant condition of the building renders it unsuitable for letting as a commercial space. To raise the standard of accommodation in the basement and ground floor to such a level that would make it commercially viable will demand substantial financial investment in the order of £500,000-£1,000,000. Research conducted for a very similar building at No.19 John Street, indicated that a return on such an investment is not viable (please see marketing information enclosed).
- Should the current commercial use be retained at basement and ground level, it would be necessary to provide a separate and secure entrance to the commercial space. The existing ground floor includes internal wall panelling of high historic value. Therefore installing a secure and separate door/locking system would likely have a detrimental to the building's heritage value. A secure and separate entrance to the basement spaces is feasible, but would likely require the demolition of some internal partitions to connect the rooms.

- Should the current residential use be retained at first, second and third floor, it would be necessary to provide a secure entrance separating it from the commercial spaces at ground and basement level. Drawing 125 SK 004 looks at the feasibility of creating one apartment (over three floors) accessed from the first floor landing. Unfortunately it has found that the existing stair is of insufficient width to allow for the addition of a new separate and secure apartment entrance.
- The Equality Act 2010 legally protects people from discrimination in the workplace. This includes accommodating individuals with restricted mobility, through the provision of level access and accessible WC facilities. The changes in ground floor level at 39 Great James street restrict accessibility. Further, the door widths have an effective clearance less the minimum (750mm) stipulated in Part M of the building regulations. Adapting the building to comply with the Equality Act 2010, will have a detrimental impact on its heritage value.

Transport

Cycle storage has been added in the front vaults at basement level. Please see drawing 125 P 00 Rev B.

Section 106 – Car Free.

Towards the end of 2016, we accepted Camden's view that 39 Great James Street was still classified as part residential, part commercial. This was despite evidence of works associated with a granted application for a change of use having commenced. In the interest of progressing the application to enable the restoration of the building a new application was submitted that included a request for a change of use to a single dwelling house.

The existing use class still includes some residential use, which confers parking rights. In 2013, Camden decided it was 'unreasonable' to remove parking rights from No.31 Great James Street (2013/3492/P), which was also seeking at the time a change of use from mixed residential/commercial to single dwelling house. Given this, we would kindly ask that you reconsider the removal of parking rights, in line with precedent.

Section 106 – Construction Management Plan (including fee).

It has been requested by Camden that a CMP-Pro Forma be completed. Having reviewed this form, it appears to be tailored to large scale developments. Given the modest scale of the proposals we are unclear why a CMP-Pro Forma is being requested. Further, it does not appear to form part of other similar developments on the street.

The Pro-Forma includes 41 questions, divided into six sections. Our initial response to each section is as follows:

Timeframe	At planning stage, while it may be possible to provide general timeframes, you would appreciate that no contractor has been appointed and it would be misleading to give specific site activities and dates at this stage.
Contact	A contractor has not yet been appointed and we are therefore unable to provide contact details at present.
Site	Project start and end dates are yet to be determined, pending planning approval.
Community Liaison	The works will be isolated to a single building on a minor road with mixed residential and commercial use. The impact on the neighbouring properties (one of which is currently vacant, the other of which is a residence) is anticipated to be nominal. Camden's standard working hours for the site will be adhered to. Consultation with the local community and the formation of a construction working group would therefore be excessive, given the scale of the project.
Transport	A site transport plan cannot be fully determined at this stage. The proposals do not include any significant excavation nor crantage. The

works to the host building will be modest. Small structural members will be used for the rear extension, unloaded from small vehicles on the street.

Environment

Specific information on noisy and/or dusty work cannot be determined at this stage. Due to parking restrictions, site waste is likely to be removed through a load and wait.

Given the scale of the build and the stage of the project we are not quite clear on why the CMP-Pro Forma is required. We would be grateful if you could elucidate what information might be necessary at this stage to move the application forward.

Section 106 – Highway works (footway repaving adjacent to the site).

Currently, the scope and cost of these repairs is undetermined. We would therefore like to seek clarification before responding fully.

I hope the above is clear and helpful. We look forward to hearing from you.

Yours sincerely,

Robert Prewett