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# <u>Design Statement: 15 Great James St, Holborn, London, WC1N 3DP</u> 26.07.2019

We are forwarding an application for the replacement of a two storey rear extension from lower ground to ground floors with a terrace at first floor level. Alterations and rebuilding of the rear façade and internal restoration and erection of roof terrace to the property at 15 Great James St. The original openings to No.14 within the stairwell at all floor levels and on the third floor are to be reopened in order to provide circulation between No.14 & No. 15, all associated with their current B1a use as offices.

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#### 1. Introduction

- **1.1** Owen Architects Ltd. has been instructed by 15 Great James Street Ltd to submit a planning application for the extension and refurbishment at 15 Great James St. This document is to support the planning application and listed building application.
- **1.2** The existing building, is located within the Holborn and Convent Garden Ward of Camden Council at the North end of Great James Street, near the junction with Northington Street. The property backs onto light industrial units accessed by Cockpit Yard. No. 15 is Grade II\* listed by Historic England and lies within Bloomsbury Conservation Area.
- 1.3 The property at No.15 is currently not occupied and is permitted (Class B1a) as offices. No. 14 is occupied as offices at present. The intention at No.15 is to demolish and rebuild the rear façade and to excavate and build an extension under the rear terrace to provide extra meeting room space at ground and lower ground level and also to refurbish the existing building, this includes reinstating original openings between No.14 and No.15 that have recently been closed. The office would include function and meeting room facilities, amenity space and storage space. Other than reinstating the openings within the stairwell, no works will be carried out at No.14 therefore this document will focus on only the works at No.15.
- **1.4** This statement will provide an overview of the design proposals taking into consideration the property's background and its setting. The proposals within this DAS support a sensitive, high quality design which responds to the character, setting, context, form and scale of the site and neighbouring buildings in particular its Grade II\* listing and location within the Bloomsbury Conservation area.

## 2. Relevant Planning Policy & Guidance

- LDF Core Strategy and Development Policies 2010
  - CS1 Distribution of growth
  - CS5 Managing the impact of growth and development
  - CS8 Promoting a successful and inclusive Camden economy
  - CS9 Achieving a successful Central London
  - o CS11 Promoting sustainable and efficient travel
  - o CS14 Promoting high quality places and conserving our heritage
  - DP13 Employment sites and premises
  - o DP17 Walking, cycling and public transport
  - DP18 Parking standards and limiting the availability of car parking
  - DP24 Securing high quality design
  - DP25 Conserving Camden's heritage
  - DP26 Managing the impact of development on occupiers and neighbours
- Camden Planning Guidance 2011
- Bloomsbury Conservation Area Appraisal and Management Strategy 2011
- NPPF 2012
- London Plan 2011

# 3. Planning History

# 15 Great James Street

2013/3117/P & 2013/3404/L Change of use of existing office building (Class B1a) to residential unit (class C3), with alterations to include the erection of a two-storey rear extension at lower ground and ground floor level with associated roof gardens and a balcony to the rear at first floor level.

#### 14 Great James Street

2015/3046/P & 2015/3185/L Erection of a two-storey rear extension at lower ground floor level with a terrace and meeting room at first floor level following demolition of the existing two storey extension, alterations to the rear façade including extension at 1<sup>st</sup> to 3<sup>rd</sup> floor level, associated internal restoration and erection of dormer and terrace at rear roof level, and installation of 3 roof lights.

#### 2013/3114/P & 2013/3403/L

Change of use of existing office building (Class B1a) to single family dwelling (Class C3), to include the erection of a two-storey rear extension at lower ground and ground floor level with terraces at ground and first floor level following demolition of existing two storey extension, alterations to rear façade, and erection of dormer and terrace at rear roof level.

External alterations to include rebuilding rear building elevation following demolition of existing rear extensions, dormer roof extension and associated internal alterations in association with the conversion of existing office (Class B1a) into single family dwelling (Class C3)

2006/2587/A & 2006/2588/L Installation of a bracket and pole for the display of a flag to the front elevation between ground and 1st floor levels of the office building (Class B1). Refused 14/08/2006

8703721 & 870535 Alterations and rear extension to accommodate new lift and toilets. Granted 05/05/1988

29432(R) Change of use of the ground floor from offices to use for educational purposes. Granted 14/12/1979

00229 Erection of extension of basement, ground and three floors over, for office use. Granted 12/07/1965

#### 11-12 Great James Street

2010/6705/P & 2010/6707/L Revision to planning permission (ref: 2008/1141/P) granted on 31/03/2009 for the change of use and works of conversion from office use (Class B1) to residential use (Class C3) to provide two single family dwelling houses, including new part single, part two storey rear extension and balcony at first floor level. Revision comprises the retention of and alterations to existing part single, part two storey rear extension; replacement of existing brick link with glazed link; replacement of existing glazed roof area and installation of 2 roof lights at number 11. Granted 28/04/2011

#### 31 Great James Street

2013/3492/P & 2013/3698/L Change of use from solicitor's office and (part) residential to a single Dwelling house (Class C3) including associated external alterations and replacement of single storey rear extension. Granted 16/09/2013

#### 16 John Street

2012/5456/P Change of use from office (Class B1) to single dwelling house (Class C3). Granted 12/02/2013

## 20 John Street

2013/1479/P & 2013/1397/L Change of use of office (Class B1) to residential (Class C3) to create 5 flats and 1 mews house, and alterations to include, enlargement of front light well, addition of light well and railings to Roger St. elevation, insertion of windows and entrance door to proposed mews house on Roger St. elevation, reinstatement of basement level to non-original extension including roof terrace at 20A John St, insertion of 3 windows at front lower ground level of 20 John St., minor alterations to front railings, and the installation of a new refuse lift from basement light well to street level. Recommended for approval subject to a Section 106 Agreement

## 27 John Street

2012/2735/P Change of use from publisher's office (Class B1) to dwelling house (Class C3). Granted 22/04/2013

### 25 Johns Mews

2012/4925/P & 2012/5150/L Change of use from office at ground floor (Class B1) and flat on first floor (Class C3) to a single dwelling house (Class C3), including creation of roof terrace with privacy screen on flat roof, installation of 2 roof lights and external alterations to fenestration. Granted 26/03/2013.

#### 4. Area

Bloomsbury Conservation area is located between the City of London and the City of Westminster on the Northern side of Soho and Covent Garden. To the South-East is Finsbury which flows into the financial district of the City, Clerkenwell sits to the East, with Kings Cross and Euston to the North. To the West is Fitzrovia which meets the boundary of Westminster City Council.

The property at St James Street also sits within the viewing corridor from Primrose Hill to St Pauls Cathedral.

#### 4.1 Bloomsbury Conservation Area & Local Legislation

Bloomsbury Conservation Area spans from Euston Rd in the North, High Holborn and Lincoln's Inn Fields in the South and from Tottenham Court Rd in the West to King's Cross Rd in the East. It is considered a notable example of town planning due to the retention of the vernacular architecture and its early listing as a conservation area. (1968)

Whilst a range of different typologies of building are seen across the conservation area the predominant style is the terraced townhouse.

The special characteristics of the area derive from the formal planning arrangement of streets and leafy squares, the contrast between open and closed spaces and classical styles of architecture.

- Grid pattern of streets running North-West to South-East and South-West to North-East.
- A hierarchy of street scale with differences between arterial routes crossing the Conservation Area, primary spacious streets, narrower secondary streets, mews and lanes.
- Main arterial routes have larger scale buildings.
- Rectilinear squares, in proportion with surrounding blocks.
- Townhouses arranged in terraces in Stuart, Georgian, Regency and early Victorian design.
- Larger scale courtyard style plans around the Inns of Court and large footprint buildings for institutional and educational use, including hospitals, colleges, universities and museums.

Bloomsbury Conservation Plan paragraph 5.183 states:

The townhouses in Great James Street are particularly well preserved; the only notable alteration is the loss of glazing bars from some sash windows. Grand, four-storey terraces survive on the south side of Great Ormond Street. The terraces in these streets are constructed from a brown-red brick with red brick dressings, typical of early Georgian building, Other details of their time include decorative iron boundary railings with lamp holders over entrance gates, intricately carved wooden doorcases with brackets supporting leaded hoods, and fanlights over entrance doors of varying designs, all of which are evident in Great James Street.

The Council states the importance of supporting growth in the Camden area in the Local Plan.

## Policy G1 Delivery and location of growth

The Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

# Delivery of growth

The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by:

- A. supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site:
- B. resisting development that makes inefficient use of Camden's limited land;
- C. expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and
- D. supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

Growth in Camden will be expected to help contribute towards achieving the strategic objectives of the Local Plan and help deliver the Council's priorities set out in supporting text below.

This Plan seeks to meet Camden's objectively assessed needs to 2031 for:

- 695,000sqm of office floor space (see Policy E1 Economic development)

The Camden Local Plan also notes the following:

#### Policy E1 Economic Development

5.9 Small businesses often seek premises that have flexible terms like shorter leases, layouts that can adapt as the business grows or changes and networking space to interact with other small business or to meet with clients. Therefore, as well as safeguarding existing employment sites, we will seek the provision of innovative new employment floorspace in developments that will provide a range of facilities including: flexible occupancy terms; flexible layouts; studios; workshops; and networking, socialising and meeting space that will meet the needs of a range of business types and sizes.

The intension of the refurbishment to No. 15 is to provide serviced offices in a manner that can be more flexible than surrounding properties which only provide long term leases and large square meterage. By adapting this property to provide smaller spaces that can be leased on a more flexible basis, an opportunity is presented to companies that may grow or change.

## Policy D1 Design & Heritage

The Council will seek to secure high quality design in development. The Council will require that development:

7.1 b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage:

## Policy D2 Design & Heritage

7.56 Historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival.

7.61 Where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. The Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution.

Paragraph 14 of the NPPF states that the local planning authorities should positively seek opportunities to meet development needs of their area which proactively encourages sustainable local growth.



Fig. 01: Showing Camden, Holborn & Covent Garden Ward. Source: https://mapit.mysociety.org/area/8593.html

# Policy A1 Managing the impact of development

The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. We will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;
- i. impacts of the construction phase, including the use of Construction Management Plans;
- j. noise and vibration levels;
- k. odour, fumes and dust;

## Policy A4 – Noise and Vibration

6.87 There is a proliferation of fixed machinery, such as air conditioning units in Camden's centres which cumulatively can have a harmful impact. The borough is also home to a large number and variety of food, drink and entertainment uses, often close to where people live, and as a result, conflicts can arise (see Policy TC4 Town centre uses). Such sources of noise and the character of noise can increase stress levels and cause significant disturbance. Other sources of noise such as those associated with construction are considered in Policy A1 Camden Local Plan | Protecting amenity 209 Managing the impact of development, whereby measures required to attenuate impacts.

Any proposed plant would be of a domestic scale thus would have a lower impact than noted in the above policy guidance. If external plant is required, a background noise survey will be carried out in order to inform any acceptable specification in conjunction with an acoustic consultant.

Our design will seek to protect occupants and adjoining properties by using a combination of acoustically rated façade construction and suitable attenuation of any external units. The use of mechanical ventilation units will obviate the need to open windows, so avoiding consequential noise ingress.

We believe that a requirement to assess background noise, and confirm in detail the counter measures, could be made Conditional on any Consent.

## CPG 6: Amenity

To support policy A1 Managing the impact of development, the Council expects Construction Management Plans (CMPs) to be submitted after planning permission is granted for proposals which could impact the local area. Circumstances where the Council will expect a Construction Management Plan are outlined in clause 5.5 of the Camden Planning Guidance on Amenity.

5.5 Typically, a CMP will be expected where the following developments are proposed:

- Basement developments;
- Where substantial work to listed buildings or adjacent to listed buildings is proposed; o where wildlife could be seriously affected;

As 15 Great James Street is a listed property, in a conservation area, with proposed basement development a Construction Management Plan would be required once planning permission is granted. A Basement Impact Assessment, in line with Camden's policy is provided with the application.

# 5. Design Statement

## 5.1 Site Appraisal

The site is located on the Eastern side of Great James St, one property from the corner of Northington St.



Fig.02: Existing building: 14 & 15 Great James St - No. 15 is the Northern of the two buildings.



Fig.03: Existing building: 14 & 15 Great James St, highlighting the two entrances.

The surrounding buildings along Great James St are London stock brick terraces with a mix of commercial and residential usage. The style is Georgian with faceted bay windows and pitched roofs. The streetscape is repetitive and regular. There are closet storey and additions to the rear of most of the buildings in the terrace connected to the property. To the rear of the site there are light industrial units, also with a repetitive and regular characteristic, although at a smaller scale.



Fig.04: Existing building: 15 Great James St, showing streetscape looking towards Theobalds Rd.

The property is accessible via the public foot path along Great James St near the end of Northington St. There is no rear access to the buildings as the light industrial units of Cockpit Yard close off this side.

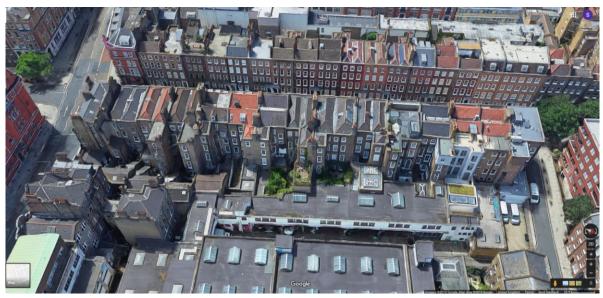


Fig.05: Existing building: 14 & 15 Great James St, highlighting the rear closet storeys

## 5.2 Existing Building

There is little relevant available planning history available for 15 Great James St other than the planning application in 2014 to alter the use class from office to living accommodation use, this has not been carried out.

During 1965 there has been a redevelopment of the rear of the building which resulted in the rear façade being rebuilt, this elevation is clearly of more recent construction.

The property is an 18<sup>th</sup> century terrace three storey building plus basement, set in a street of Georgian design. It is constructed of yellow brickwork with segmented red brick window arches and quoins, the roof finish is of clay tile.

The original frontage has slightly more ostentatious detail including red brick arches and quoins to ground floor casement windows and a parapet façade concealing the pitched roof with a stone capping to match the other stonework. The addition of more contemporary glazing units to the front of the terrace clearly try to replicate the original design without considering the detail of the earlier construction.

The previous 2014 planning application noted there is no historical value to the rear elevation and therefore this could be rebuilt. The building also does not appear to have suitable thermal or acoustic integrity for its current use or any other. The building is currently unoccupied which leaves it prone to vandalism and further deterioration, however the owners are monitoring the building regularly.

## 5.3 Proposed Works

## **5.3.1** Scale & Massing of the proposal

The design of a building should respond to the surrounding context, in addition to the restoration, we propose the demolition and re-building of the rear façade with a stepped return to match No14, the current rear façade being of a later construction and being noted as having no contribution to the listing in the report of the previous application.

The stepped rear elevation is a common addition to the terraces with the potential to mirror the recent construction to No. 14 to provide symmetry and a more thermally efficient rear fabric thus reducing the heating and cooling requirement for the interiors.

Overall, the simplicity of the proposed extension with its solid and robust construction provides a sympathetic addition to historic architecture of Cockpit Yard and provides a sense of mass and permanence whilst matching the approval and built elevation of its neighbour at No.14.

## 5.3.2 Frontage

The residential vernacular of the street frontage along Great James St has provided no gardens or landscaping previously, we propose to keep the current frontage as is in order to preserve the nature of the streetscape. Minor repair work will be carried out to the brick façade and stone elements, original features will be retained and restored.

It is our intension to replace the one over one single pane windows with traditional six over six units with a view to improve the outward appearance of the property and helping to revert back to its original elevation.

#### **5.3.3** Access

The building as existing is not accessible with level changes throughout and narrow spaces. The new proposal would accommodate the ambulant disabled and with wheelchair access will be managed by 24hour office management to overcome the front steps. Once over the threshold a lift will give access to all floors.

### 5.3.4 Parking & Transport

## Camden Local Plan 10. Transport

10.8 To promote sustainable transport choices, development should prioritise the needs of pedestrians and cyclists and ensure that sustainable transport will be the primary means of travel to and from the site.

The property at Great James St is within a 10min walk of three central tube stations, multiple supermarkets and has bus stop 0.2 miles away with regular buses to Old St and through Holborn to Waterloo, Victoria, Oxford Circus and Battersea. Therefore PTAL for the property already has excellent provision.

There are a number of on street car parking areas close by however with Camden Local Plan Policy T2 – car free developments we would expect an allowance of 0 car parked allocated to the property. With the style of flexible working space, so many options for transport amenities and the proximity of public transport we expect a reduced requirement for parking than average for office use. However there may be a requirement for spaces designated for disabled parking

There will be provision for 8 staff cycle storage spaces on site in the vaulted arches under the street in accordance with Chapter 6 of the London Plan. In addition, we would propose to introduce visitor cycle parking loops to the wider public pedestrian extension of Great James St in front of the Rugby Tavern where there is space to accommodate, the London Plan parking standards notes we would need to accommodate 2 visitor cycle parking spaces. These parking spaces would have the natural observation of the surrounding buildings and Rugby Tavern.

# Policy T1 Prioritising walking, cycling and public transport - Cycling

In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:

h. provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within our supplementary planning Camden Local Plan | Transport 301 document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development; i. makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;

#### Camden Planning Guidance document for Transport

8.6 As stated in the Local Plan Policy T1, the Council will expect developments to provide, as a minimum, the number of cycle parking spaces as set out in the London Plan. The Council will also seek an additional 20% of spaces over and above the London Plan standard to support the expected future growth of cycling for those that live and work in Camden.

8.21 For developments that require long stay cycle parking for staff, the Council will expect supporting facilities such as lockers, changing facilities, a drying room and showers to be provided. These should be located in such a way that is convenient and within close proximity to the cycle parking facilities.

8.23 The use of existing on-street facilities, such as 'Sheffield' stands on the public highway, will not be considered as these do not provide adequate security for long stay parking and this would reduce capacity for short stay parking.

8.26 Parking for visitors should be clearly visible or clearly signed from the public highway. The cycle parking should be sited within 15 metres of a building entrance, or within 25 metres for larger mix-use developments where frequent surveillance is possible. In some circumstances it may also be appropriate to install CCTV, for example where the level of natural surveillance is inadequate.

Central London Cycle parking requirements - The London Plan (LP) (p277)					
Class	Long stay	Short stay			
B1 - Business Offices	inner/ central London: 1 space per 90 sqm outer London: 1 space per 150 sqm	first 5,000 sqm: 1 space per 500 sqm thereafter: 1 space per 5,000 sqm			

Fig. 06 Central London Cycle parking Requirements

Proposed Total Gross	London Plan (LP) standard requirement		Camden council (CC) requirement (+20%)**		
external area (sqm)	Long stay	Short stay*	Long stay	Short stay*	Total
665	7	2	8	2	10

Notes			
* A minimum of 2 short-stay and 2 long-stay spaces must be provided - The			
London Plan (page 278)			
** Camden Council seeks +20% cycling spaces based on the London Plan - CPG:			
Transport (page 53)			

Fig. 07 Proposed Cycle Parking Calculations

The proposed development at 15 Great James Street will generate increased demand for people to cycle, as such it is important to provide sufficient cycling provisions. Using the requirements set by both the London plan and the Camden Planning Guidance Transport document, the proposal will need 8 Long stay spaces, 2 Short stay spaces and sufficient amenities such as showers, lockers and changing facilities (for calculations see fig .06). Short stay spaces will be located on the street within close proximity to the entrance, using the CPG recommended 'CaMden M' stands. Long stay spaces will be in the demise of the property to ensure security.

## 5.3.5 Employment

The building is currently unoccupied. By the redevelopment of the site into a serviced office there is potential for new employment in the area thus expanding local employment growth. This would include management, domestic staff and servicing companies.

#### 5.3.6 Servicing

#### Camden Local Plan Sustainability and Climate Change

8.97 To make sure that residents and businesses can properly store and sort their waste and to make household recycling as easy as possible, the Council will require developments to provide adequate facilities for recycling and the storage and disposal of waste.

We would propose servicing vehicles access the front of the building through the lower ground entrance, the vaults under the road would provide bike storage, storage and refuse therefore reducing the need to alter the existing fabric in upper floor rooms. The type of service vehicle would be generally small vans, providing services outside heavy traffic hours. Within the property services would utilise existing routes through the building where possible to minimise unnecessary alterations

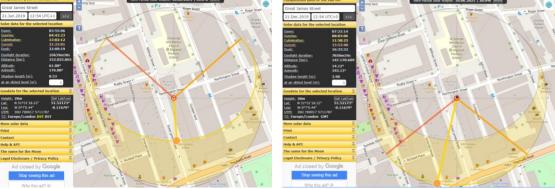
#### **5.3.7** Site Contamination

We are unaware of any history of this or adjacent sites used for industrial purposes. We are progressing with site investigation in order to confirm if action needs to be taken to mitigate potential hazards.

#### 5.3.8 Flood Risk assessment

Not required. The site is not in a flood risk zone as confirmed by the Environment Agency Flood Risk for Planning Map.

5.3.9 Sun studies & sustainability



Summer Sun Winter Sun

The bulk of the building would benefit from passive solar gain and natural day lighting due to the footprint orientation. The first floor level is overshadowed by the flanking extension to No.14 and the height of Cockpit yard buildings therefore we would propose to match its height and massing with a similar extension.

Natural ventilation would be utilised in order to prevent unsustainable energy measures. New rear external wall construction would minimise the requirement for heating and cooling therefore mitigating unnecessary energy use.

Suitable planting species would be proposed to the rear terrace and roof terrace order to enhance the biodiversity of the surrounding area and improve air quality. A BREEAM pre-assessment is provided with the application submission to clarify targeted rating.

# 5.3.10 Interior

We propose to rebuild the rear using new construction methods and suitable materials as approved at No.14 using, double glazing to the rear with thermally and acoustic walls, floors and roofs. The extension into the full footprint of the plot will provide suitable amenity space without compromising above ground. Due to work by the previous owners between 1960s and 1980s, the

original decorative features have been largely removed, these will be restored and reinstated where possible, a schedule of condition including restoration proposals is issued with the planning application.

# 6. <u>Drawing References</u>

Drawing / Document	Scale	Drawing Number
Location Plan	1:1250 @ A3	406-1000-B
Existing Site Plan	1:50 @ A1	406-1001-B
Proposed Site Plan	1:50 @ A1	406-1101-B
Existing Basement Plan	1:50 @ A1	406-1999-B
Existing Ground Floor Plan	1:50 @ A1	406-2000-B
Existing First Floor Plan	1:50 @ A1	406-2001-B
Existing Second Floor Plan	1:50 @ A1	406-2002-B
Existing Third Floor Plan	1:50 @ A1	406-2003-B
Existing Roof Plan	1:50 @ A1	406-2004-B
Proposed Basement Floor Plan	1:50 @ A1	406-2099-C
Proposed Ground Floor Plan	1:50 @ A1	406-2100-C
Proposed First Floor Plan	1:50 @ A1	406-2101-B
Proposed Second Floor Plan	1:50 @ A1	406-2102-C
Proposed Third Floor Plan	1:50 @ A1	406-2103-C
Proposed Roof Plan	1:50 @ A1	406-2104-B
Existing Front Elevations	1:50 @ A1	406-3000-B
Existing Rear Elevations	1:50 @ A1	406-3001-B
Proposed Front Elevations	1:50 @ A1	406-3100-B
Proposed Rear Elevations	1:50 @ A1	406-3101-B
Existing Sectional Elevation AA	1:50 @ A1	406-4000-A
Existing Sectional Elevation BB	1:50 @ A1	406-4001-A
Existing Sectional Elevation CC	1:50 @ A1	406-4002-B
Existing Sectional Elevation DD	1:50 @ A1	406-4003-B
Existing Sectional Elevation EE	1:50 @ A1	406-4004-B
Proposed Sectional Elevation CC	1:50 @ A1	406-4102-B
Proposed Sectional Elevation DD	1:50 @ A1	406-4103-B
Proposed Sectional Elevation EE	1:50 @ A1	406-4104-B
Schedule of Condition	N/A	406-SC-0660-20190726
Design Statement	N/A	406-DS-0001-20190726
Historical Context	N/A	DAS Appendix 1
Basement Impact Assessment	N/A	