

No. 4–6 Bedford Place WC1B 5JD

**Heritage Statement: Fire Protection Works
For
Nebra Property 2022 Limited**

November 2023

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Executive summary

This Heritage Statement has been written by Spurstone Heritage Ltd to support a listed building consent application for fire protection works at No. 4–6 Bedford Place, London WC1B 5JD, a Grade II-listed building within the Bloomsbury Conservation Area in the London Borough of Camden.

The Site is three adjoining houses in the listed terrace Nos. 1–20 Bedford Place. They have been a single property in hotel use since 1978. This is the optimum viable use of the designated heritage asset, and the one that will best support its long term conservation.

The hotel is currently closed and the Site is vacant. Planning permission and listed building consent have been granted to extend, repair and refurbish the listed building as a fully accessible, four-star hotel with 43 bedrooms, Reception and Bar on the ground floor and communal use of the rear garden. Full internal refurbishment will bring the guest accommodation up to current standards.

In order to operate, the hotel must meet current fire safety standards. The existing floors cannot provide the required minimum of 60 minutes' fire resistance in all parts of the building; the present application is for fire protection works to meet those standards. This involves strengthening the floors at ground and first floor level in order to preserve existing proportions and detailing, whilst replacing existing suspended ceilings with more appropriate detailing at lower ground, second and third floor.

The significance of the parts of the Site affected by the proposals may be summarised as follows:

High significance	Front elevation, main stair and lanterns over
Moderate significance	Historic plan form where this survives; upper service stair in No. 4; historic interior joinery; decorative plasterwork
Low significance	Front lightwells and vaults
Neutral significance	Rear extensions and lightwells; upper service stairs in Nos. 5 and 6, rooflights
Detracts	Inserted partitions that disrupt the historic plan form; obtrusive and outdated services.

The proposed works have been carefully designed to improve fire safety without affecting the historic character of the significant interiors, and they have been refined in the light of detailed pre-application advice provided by the Council's planning and conservation officers.

The proposals for which listed building consent are sought are on the ground and first floors and will cause less than substantial harm to significance, through alterations to the historic floor structure and loss of a small amount of historic fabric. The less than substantial harm will be mitigated by careful recording of the existing floor structure. The works are necessary to strengthen the structure of the building to ensure suitable fire protection whilst retaining decorative fabric.

The proposals for the basement, second and third floors will enhance significance by removing intrusive modern cornices, fully revealing the sash windows, and restoring historic proportions. We understand that these works do not need Listed Building Consent because they are dealt with under a separate listed building consent application (ref: 2023/1398/L). However, for completeness an assessment of these works is completed in this heritage statement

The less than substantial harm will also be balanced by significant public benefits. The floor strengthening works, while causing less than substantial harm to significance, will improve the long-term integrity of the listed building. The works will restore the historic character and appearance of the significant ground- and first-floor interiors, and reinstate the historic hierarchy of decoration. They will make it possible to bring a vacant property back into use as a hotel providing inclusive access and accommodation of an appropriate standard for this part of Camden, with sensitive repair

and refurbishment of the fabric that will sustain, enhance and better reveal the significance of the designated heritage asset.

The works will not affect the exterior of the listed building; they will preserve the character and appearance of the Bloomsbury Conservation Area.

The proposals will support the efficient and sustainable operation of the hotel — the optimum viable use of the asset — and thus support its long-term conservation. They satisfy national and local policies for the protection of the historic environment. Approval of the application is therefore requested.

1. Introduction

Purpose of this Heritage Statement

- 1.1 This Heritage Statement has been written by Spurstone Heritage Ltd for Nebra Property 2022 Ltd, to support a listed building consent application for fire protection works at No. 4–6 Bedford Place, London WC1B 5JD. It should be read alongside the drawings and reports by the architect (Studio Moren) and structural engineers (Hydrock), the Planning Statement (Maddox Associates) and the supporting letter from the fire safety consultant (Studio Fahrenheit) submitted with this application.
- 1.2 Planning permission and listed building consent have recently been granted to extend, modernise and refurbish the hotel (Refs. 2023/1315/P and 2023/1398/L, approved 26 September 2023).
- 1.3 The present application is for fire protection works necessary to ensure compliance with Policy D12 Fire Safety of the London Plan 2021 and Parts B1–B5 of the Building Regulations 2010; this is essential to enable the hotel to operate.
- 1.4 The description of development for the present application is:

Floor strengthening works at ground and first floor.

Heritage planning context

- 1.5 The Site consists of three adjoining houses in the terrace Nos. 1–20 Bedford Place, a Grade II-listed building in the Bloomsbury Conservation Area, in the London Borough of Camden (LBC).
- 1.6 The listed terrace, neighbouring listed buildings and conservation area are designated heritage assets as defined in Annex 2 of the National Planning Policy Framework 2021 (the NPPF).
- 1.7 This Heritage Statement explains the impact of the proposed fire protection works on the significance of the heritage assets, and justifies them in relation to the NPPF and LBC's policies for the protection of the historic environment.

Methodology and structure of the report

- 1.8 The information contained in this report was acquired through desk-based research, a visit to LBC Archives, site visits (10 and 17 May 2022; 22 January 2023) discussion with the developer and architect, and pre-application consultation with LBC Planning and Design Officers (Ref 2023/4390/PRE), including a site visit (17 October 2023).
- 1.9 This Introduction is followed by a description of the Site (Section 2) and summary assessment of significance (Section 3). The significance assessment uses the definitions of significance in the NPPF and provides the basis for assessing the impact of the proposals (Section 4). Appendix A contains the relevant entries from the National Heritage List, and Appendix B summarises relevant policies. The full text of the pre-application advice from LBC's Conservation Officer (email 16 November 2023) is included at Appendix C.

Scope and limitations

- 1.10 For brevity, the detailed history of the Site in the Heritage Statements submitted with previous applications is not repeated here; the assessment of significance is summarised, and deals only with the parts of the Site affected by the present proposals.

2. The Site



Fig 1. Site location



Fig 2. Nos. 4-6 Bedford Place, front elevation

- 2.1 The Site is on the east side of Bedford Place towards the south end. The front boundary is the pavement of Bedford Place, the vaults at basement level extending as far as the roadway. The rear boundary is shared with an open green space, not accessible to the public. The property is bounded to the north by No. 7 Bedford Place and to the south by No. 3. The approximate centre of the Site is at Grid Reference TQ302817.
- 2.2 The property consists of three adjoining terraced houses of three main storeys with basement and attic (Fig 2). The front elevations are of rusticated stucco at basement and ground levels and stock brick above, well proportioned and with subtly refined architectural detail: the attic storey is set back above a stucco cill band, and the houses in the centre and at each end project slightly to suggest a palace front, mirrored on the opposite side of the street.

3. Significance

- 3.1 The significance of the Site is assessed in detail in the Heritage Statements submitted with the recent applications. This section therefore summarises the significance only of the parts of No. 4–6 Bedford Place affected by the proposed fire protection works.

Assessing significance

- 3.2 The assessment follows the advice on assessing significance contained in the NPPF. Significance underpins the definition of a ‘heritage asset’ in Annex 2 of the NPPF:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).

- 3.3 Annex 2 of the NPPF defines significance as:

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

Levels of significance

- 3.4 Different levels of significance may be defined as follows:

High significance: makes an important specific contribution to the special interest of the Site

Moderate significance: makes a specific contribution to the special interest of the Site

Low significance: makes a general contribution to the interest of the Site

Neutral: makes no contribution to special interest, but does not detract

Detracts: obscures or harms significance.

Statutory designation: listed building

- 3.5 The significance of No. 4–6 Bedford Place is officially recognised by its inclusion in the statutory list of buildings of special architectural or historic interest as part of the terrace Nos. 1–20 Bedford Place, at Grade II (NHL No. 1244591; Appendix A). This confirms that the terrace is considered to be a building of national importance, warranting every effort to preserve it.

Significance of No 4–6 Bedford Place






- 3.6 The terrace Nos. 1–20 Bedford Place has historic interest as part of a substantial phase of development of the Bedford Estate begun in 1800. It exemplifies a style of town planning and domestic architecture established in the eighteenth century. Its significance is derived from its architectural design and materials, plan form, evidential value as early nineteenth-century terraced houses, and its positive townscape contribution.
- 3.7 The historic plan form has been disrupted to some extent at all levels, to make lateral corridors through openings in the party walls and access to shared toilets at the rear of the building. Lesser disruption has been caused by the insertion of partitions to make en-suite bathrooms, showers and shared toilets. These changes **detract from significance**.
- 3.8 The historic plan form is preserved in the main circulation spaces (vestibules, staircase halls, stairs and landings) and in the ground-floor rooms of Nos. 5 and 6. This has **moderate significance**. The main stairs are architecturally interesting: side hung around an open well, top lit by the roof lanterns, with open strings and wreathed balustrades, they have **high significance**.

- 3.9 The basement stairs in all three houses and the upper service stair in No. 4 are plain designs suited to the low status of these spaces. They are well preserved, and have **moderate significance**. The upper service stairs in Nos. 5 and 6 are twentieth-century replacements with **neutral significance**.
- 3.10 The surviving elements of historic architectural decoration on the ground and first floors, including tall skirtings, large panelled doors and doorcases, ornamental plasterwork and chimneypieces, contribute to the high status of these interiors. Some fireplaces were given new grates or chimneypieces in the late nineteenth century, and have historic interest as evidence of technological change. The historic, architectural and artistic interest of these elements gives them **moderate significance**.
- 3.11 The modern suspended ceilings and elaborate cornices in the corridors and in the bedrooms on the basement, second and third floors are inappropriate in scale and design. Modern finishes in the entrance and hotel reception areas on the ground floor are unsympathetic in design, materials and finishes. Bathrooms, showers and handbasins introduced into the bedrooms are poorly arranged, disruptive to the historic plan form and visually obtrusive. These elements all **detract from significance**.
- 3.12 The significance of the parts of the Site that would be affected by the proposals may be summarised as follows:

High significance	Front elevation, main stair and lanterns over
Moderate significance	Historic plan form where this survives; upper service stair in No. 4; historic interior joinery; decorative plasterwork
Low significance	Front lightwells and vaults
Neutral significance	Rear extensions and lightwells; upper service stairs in Nos. 5 and 6, rooflights
Detracts	Inserted partitions that disrupt the historic plan form; obtrusive and outdated services.

Significance plans

- 3.13 The plans on the following pages show the initial assessment of significance, and may be revised in the light of future site investigations. The different level of significance are coloured as follows:

	High significance
	Moderate significance
	Low significance
	Neutral significance
	Detracts from significance

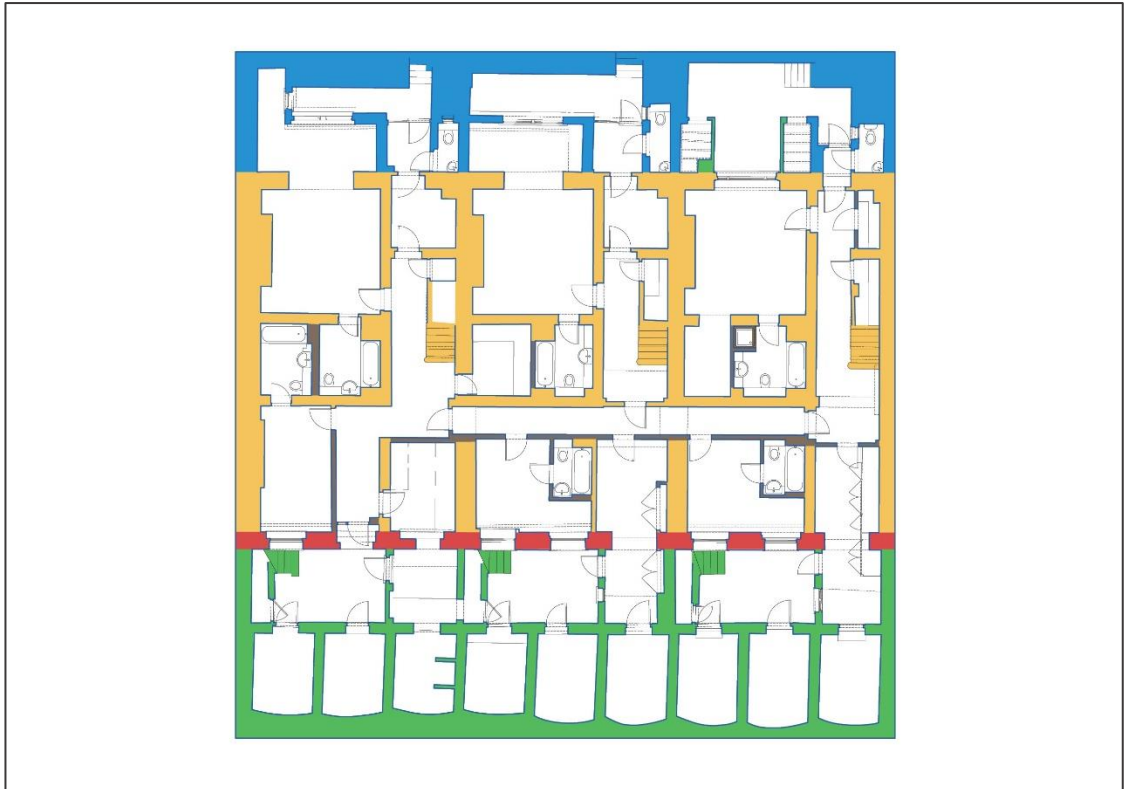


Fig 3. Basement: significance



Fig 4. Ground floor significance

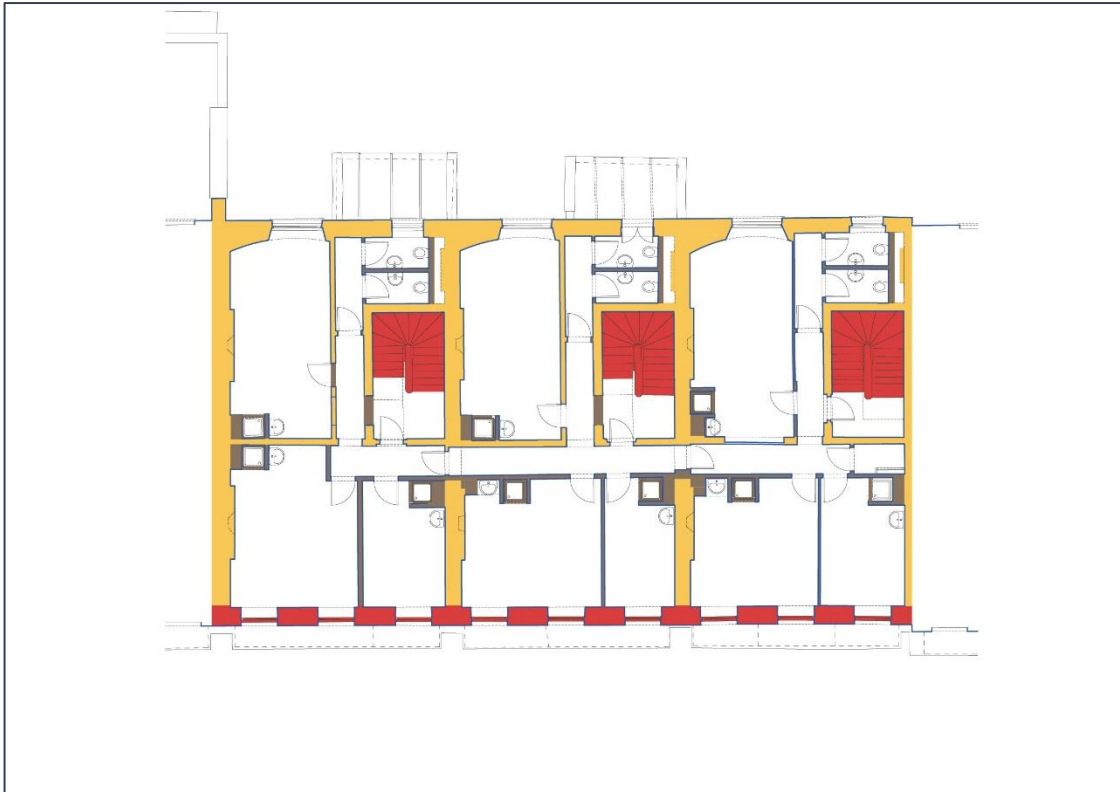


Fig 5. First floor significance

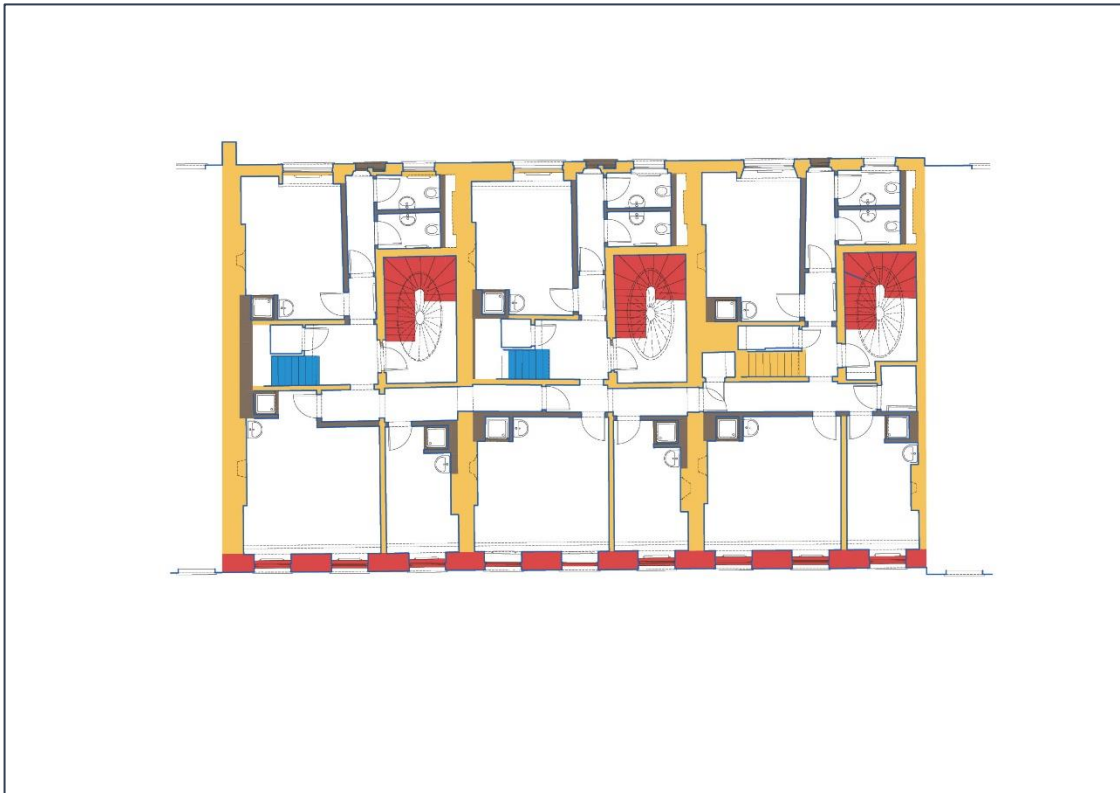


Fig 6. Second floor significance

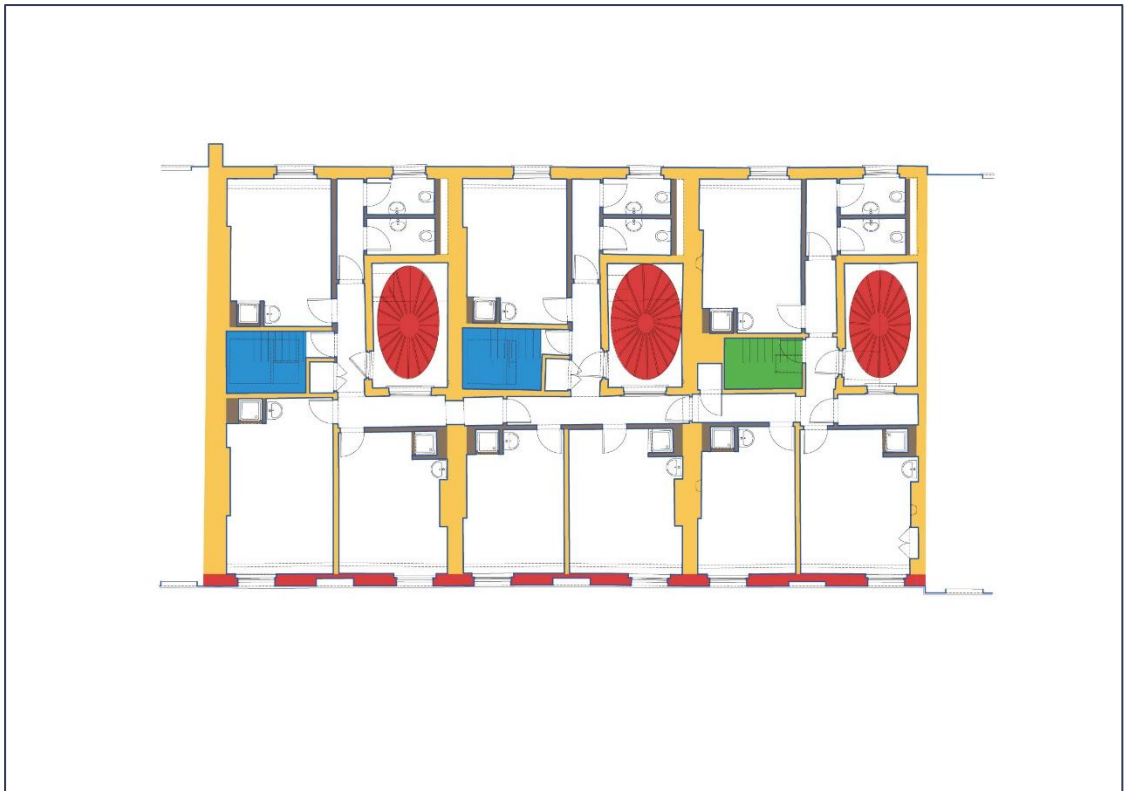


Fig 7. Third floor significance

4. The proposals and their impact

Background to the proposals

- 4.1 In order to operate the hotel must meet current fire safety standards.
- 4.2 Following the approval of listed building consent Ref 2023/1398/L, minor opening-up work revealed that the historic floor structure above the ground and first floors has unusually wide spans between secondary beams. The beams are sufficient to support the existing structure but would fail in the event of a fire; the existing floors cannot provide the required minimum of 60 minutes' fire resistance in all parts of the building.

Pre-application consultation

- 4.3 Pre-application advice was sought from LBC. Four options that would upgrade fire resistance to the required level were presented at a site visit with the Council's Planning and Conservation Officers, and written pre-application advice was received on 16 November 2023. (Ref 2023/4390/PRE; Appendix C) The Conservation Officer advised that the preferred solution would be a hybrid approach: strengthening the floor structure above the ground and first floors, and replacing existing ceilings with new, fire-rated ceilings in the basement and on the second and third floors.

The proposals

Ground and first floors

- 4.4 The ground and first-floor rooms contain historic joinery and decorative plaster cornices which give these interiors moderate significance. It is therefore proposed to retain and restore the architectural interior decoration in these rooms, and protect them by strengthening the structure to increase its resistance to fire from the underside.
- 4.5 The existing ceilings will be repaired with materials to match the existing, whether lath-and-plaster or plasterboard. They will then be carefully propped, and the floorboards and joists above will be temporarily removed to permit the installation of additional secondary beams at 390mm centres, or centrally between existing beams. Fire-resistant Corofil PFC slabs will be fitted between the secondary beams before the joists and floorboards are replaced. For full details of the proposed sequence of works, please refer to the drawings and Design and Access Statement.

Basement and upper floors

- 4.6 A different approach is taken in the basement and on the second and third floors. Here, the existing ceilings and cornices will be removed and replaced with fire-rated ceilings. A simpler, straight-run plaster cornice will be installed in the second-floor rooms. The basement and third floor will have no cornice.

Impact on significance

Ground and first floors

- 4.7 The proposals for the ground and first floors require some intrusive work to the historic floor structure, primarily from cutting secondary beams in order to allow PFCs to be attached to the primary beam— with consequent loss of a small amount of historic fabric — and introducing new timber beams at 390 centres. This would cause less than substantial harm to significance.
- 4.8 The less than substantial harm is at the low end of that scale of harm. The Council's advice is that this approach will cause the least harm to the significance of the heritage asset compared to other approaches that were considered at pre-application. The full text of the Conservation Officer's advice is given in Appendix 4, but it is worth highlighting the reasoning behind the advice by selective quotation:

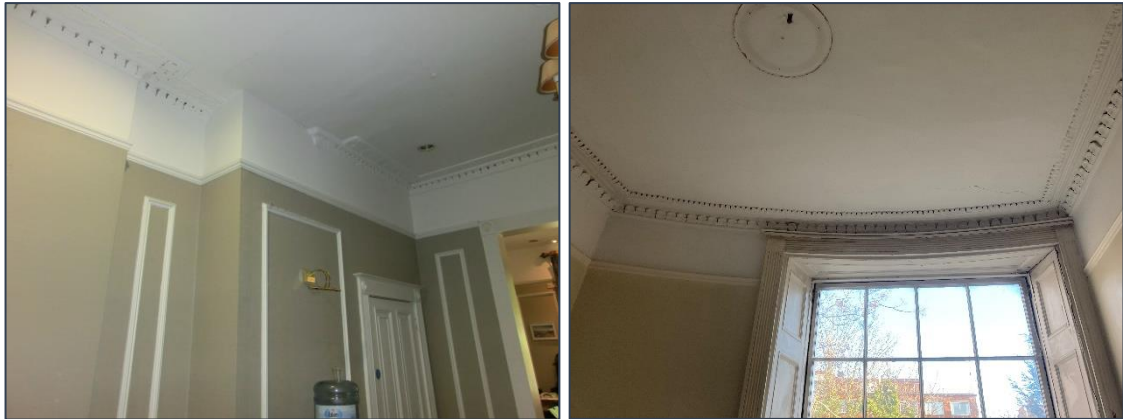


Fig 8 (left). Ground floor front room. Fig 9 (right). Second-floor rear bedroom

These works directly address the cause of the issue (the lack of strength in the existing floor) and therefore the harm is directly related to the need for the harm. While the fabric of the building is certainly of significance, the fabric within the floor structure is concealed from view and the harm to significance (as far as general public experience of the building goes) would be lesser than the creation of a suspended ceiling.

The rooms of the building are generally quite light on decorative detail, as is typical of terraced houses of this period. The majority of decorative detail is found on the skirting, window and door architraves and the cornice, i.e. it chiefly accentuates the proportions of the rooms [which are] one of the key elements of the significance of the listed building Bearing in mind that the bedrooms also have consent for ensuite bathrooms, it is all the more important that the historic ceiling level remains in order for the original proportions of the room to provide breathing space around modern interventions.

The works of floor strengthening and associated floor void works are therefore considered to be the option which causes the least harm to the significance of the listed building. There will be harm to historic fabric but there would be less harm to architectural and historic character (as experienced on a daily basis) than under the suspended ceiling works.

- 4.9 Each of the rooms affected by the proposal has a historic decorative plaster cornice. The decorative detail is clogged with layers of paint. Some lengths of cornice are severely damaged or missing, and in some places the cornice is interrupted by inserted partitions (Figs 8 and 9). The surviving cornices will be cleaned of paint layers to reveal the decorative detail, and used to make moulds for replica cornices to repair or reinstate the cornice and complete the decorative scheme in each room.
- 4.10 Thus the minimal harm caused by the proposals will be balanced by the restoration, using the compelling evidence of surviving architectural features, of the most significant rooms in the listed building.
- 4.11 In addition, strengthening the structure, whilst causing less than substantial harm to significance, will improve the long-term integrity of the building as a whole, which itself is a benefit in terms of long term viability and up keep of the listed building and its most significant parts (its façades and interior decoration).



Fig 10 (left). Typical basement bedroom. Fig 11 (right). Typical third-floor bedroom

Basement and upper floors

- 4.12 At second and third floor levels suspended ceilings have already been installed (under consent; Ref. LS9704365, approved 20 June 1997). The existing cornices are modern, made of GRP or similar material. They are overscaled and over-elaborate for the relatively low status of these rooms, and travel across the window heads to form pelmets in a manner that is historically incorrect, and harms the proportions of the room and the appearance of the windows (Figs 10 and 11).
- 4.13 All the existing suspended ceilings and modern cornices will be removed and new British Gypsum (or similar) fire rated ceilings will be suspended directly from the joists on the secondary beams to isolate the historic floor structure and protect its underside (i.e. the same fire protection as existing). This would preserve the historic relationship of the ceilings, and any cornices, to window surrounds and other mouldings.
- 4.14 Council's advice confirms that any lath-and-plaster ceilings that survive at these levels can also be replaced, as this would be the least intrusive method of achieving the required fire rating within these less significant parts of the listed building, and the impact on significance is neutral.
- 4.15 The installation of the modern cornices removed evidence of any historic cornices. It is proposed to install a straight-run plaster cornices in the second floor rooms, which were designed as family bedrooms of lower status than the reception rooms on the ground and first floor. The basement and third-floor rooms will have no cornice, to reflect their low status as former service spaces and servants' quarters, and to suit their low-ceilinged proportions; this will improve room proportions and help restore the historic hierarchy of decoration throughout the listed building.
- 4.16 The works at these levels will enhance the significance of the listed building. The removal of the ugly cornice bulkheads over the windows will improve the proportions of the rooms and fully reveal the sash windows. The restoration of the decorative hierarchy will also be an enhancement overall.

Conclusion

- 4.17 The proposed works are necessary to make the building fire safe and mitigate the serious risk to life should a fire occur.
- 4.18 This is the first comprehensive refurbishment of the listed building since the 1980s. In order to operate as a hotel, it must satisfy modern fire safety regulations, which require 60-minutes' fire resistance in all parts of the building. The proposed works will ensure the continuing optimum viable use of the building, as the fire protection is needed for the existing hotel use to resume safely.

- 4.19 The project team have carried out extensive research into the history and construction of the existing building. A detailed understanding of the fabric, and this assessment of the Site's heritage significance, have informed the design of proposals that will as far as possible preserve, enhance and better reveal the significance of the designated heritage asset.
- 4.20 All feasible options for achieving the required fire rating were explored in the pre-application consultation with LBC. The design of the proposals now brought forward were refined through several iterations, and with the benefit of detailed and well-reasoned advice from the Council's Conservation Officer (Appendix C).
- 4.21 The fire safety works now proposed will help deliver the numerous benefits secured by the recent listed building consent, including bringing the listed building back into its optimum viable use as a hotel, thereby securing the long-term investment necessary for its upkeep and conservation.
- 4.22 The less than substantial harm caused by the proposed fire safety works should be weighed against the many public benefits they provide, which include: sensitive and scholarly repair and restoration of significant interiors; the reinstatement of the hierarchy of decoration throughout the listed building; and bringing a vacant property back into use as a hotel providing inclusive access and accommodation of an appropriate standard for this part of Camden.
- 4.23 The proposed works will sustain, enhance and better reveal the significance of the listed building. The overall impact of the proposals is positive.
- 4.24 The scheme supports the efficient and sustainable management of the hotel, which is the optimum viable use of the heritage asset. The proposals meet the requirements of the NPPF and Camden's Local Plan policies for the protection of the historic environment (Appendix B). Accordingly, it is requested that the application be approved.

Appendix A. Statutory List entry

Numbers 1–20 and attached railings, 1–20 Bedford Place

Overview

Heritage Category: Listed Building

Grade: II

List Entry Number: 1244591

Date first listed: 28-Feb-1969

Date of most recent amendment: 11-Jan-1999

Statutory Address 1: NUMBERS 1-20 AND ATTACHED RAILINGS, 1-20, BEDFORD PLACE

Location

Statutory Address: NUMBERS 1-20 AND ATTACHED RAILINGS, 1-20, BEDFORD PLACE

The building or site itself may lie within the boundary of more than one authority.

County: Greater London Authority

District: Camden (London Borough)

Parish: Non Civil Parish

National Grid Reference: TQ 30249 81820

Details

CAMDEN

TQ3081NW BEDFORD PLACE 798-1/100/63 (East side) 28/02/69 Nos.1-20 (Consecutive) and attached railings (Formerly Listed as: BEDFORD PLACE Nos.1-20 AND 21-40 (Consecutive))

GV II

Symmetrical terrace of 20 houses forming the east side of Bedford Place. c1815. By James Burton. Multi-coloured stock brick with rusticated stucco ground floors. Stucco 3rd floor sill band. 4 storeys and basements. 3 windows each. Slightly projecting end bays (Nos 1-3 and 18-20) and central bays (Nos 8-12). Wide segmental-arched doorways with some patterned fanlights, sidelights and double half-glazed doors. Gauged brick flat arches (painted red) to recessed sash windows, some with original glazing bars. Continuous cast-iron balconies at 1st floor level, No.11 with arched trellis balcony with tented canopy. Parapets. INTERIORS not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas, some houses with area overthrows.

Listing NGR: TQ3024981820

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: 476645

Legacy System: LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official list entry

Appendix B. Summary of relevant planning policy

- B.1 As No. 4–6 Bedford Place is Grade II-listed, works that affect its significance require listed building consent and will be assessed against Government guidance contained in the NPPF and the online NPPG, which gives useful guidance on public benefits. Historic England has produced relevant guidance on *Easy Access to Historic Buildings* (HE, 2015). In regional policy, the London Plan (GLA, 2021) contains policies for the historic environment. Local policies in the Camden Local Plan (LBC, 2017) are also relevant.

National: Planning (Listed Buildings and Conservation Areas) Act 1990

- B.2 Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 require local planning authorities, in considering whether to grant listed building consent, to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.
- B.3 Section 72 of the Act requires local planning authorities, in considering whether to grant planning permission with respect to any buildings or other land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

National: NPPF 2021

- B.4 The NPPF sets out the Government's planning policies for England. Section 16 *Conserving and Enhancing the Historic Environment* contains guidance on how local planning authorities should assess proposals to alter listed buildings. Paragraphs 197, 199, 200 and 202 are relevant to the present application.

Paragraph 197. In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. [...].

Paragraph 200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification [...]

Paragraph 202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.

National: Planning Practice Guidance

- B.5 Additional guidance for local planning authorities determining planning and listed building consent applications is available online. It contains the following advice on 'Decision-Taking: Historic Environment':

[...] sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. (Paragraph: 015)

The guidance discusses the term ‘public benefits’ as follows:

Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Public benefits may include heritage benefits, such as:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation. (Paragraph: 020)

Regional: The London Plan 2021

B.7 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20–25 years and the Mayor’s vision for Good Growth.

B.8 Chapter 7 of the London Plan, *Heritage and Culture*, contains policies for the protection of the historic environment. Policy HC1 Heritage conservation and growth states:

[...] (C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. [...]

Local: Camden Local Plan

B.9 The Local Plan was adopted on 3 July 2017 and is the basis for planning decisions and future development in the borough. Chapter 7 *Design and Heritage* contains the following policies that are relevant to the proposals.

Policy D1 Design: The Council will seek to secure high quality design in development. The Council will require that development:

- a) respects local context and character;
- b) preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c) is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d) is of sustainable and durable construction and adaptable to different activities and land uses;
- e) comprises details and materials that are of high quality and complement the local character; [...]
- g) is inclusive and accessible for all;
- h) promotes health; [...]
- n) for housing, provides a high standard of accommodation; and
- o) carefully integrates building services equipment.

Policy D2 Heritage states that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

The Council’s policy on designated heritage assets repeats the NPPF guidance on proposals that would harm significance.

Appendix C. LB Camden pre-application advice

Received by email 16 November 2023.

4-6 Bedford Place

2023/4390/PRE

Pre-application advice in respect of internal works (GII) comprising internal alterations to listed building, in relation to fire safety.

Site and Significance

The site comprises 3 early C19th terraced houses all listed at GII and laterally connected in the C20th for hotel/boarded house use. The site is within the Bloomsbury Conservation Area. The significance of the site includes its architectural design and materials, planform, evidential value as early C19th terraced houses and its positive townscape contribution.

The ground and first floors (and circulation spaces) retain their historic proportions. At second and third floor levels suspended ceilings have already been created (under consent) in 1978.

Pre-app options

The pre-application submission contains a number of options which all relate to the proposal to create better fire-separation between floors in the listed buildings. One of the main causes of the current fire-risk issue is understood to be the surprisingly few number of historic timbers supporting the floors above ground level.

Option 1 relates to works of reinforcement to the floor in conjunction with Option 2 which is a Corofil slab between joists. The advantage of this approach is that the works are chiefly contained within the floor void and result in a minimal impact on the historic proportions of the rooms and spaces affected. The disadvantages are the alteration of existing historic timbers within the floor voids.

Options 3 and 4 relate to the creation of a fire-rated suspended ceiling (and various designs and options within that general approach). The Council is confident that all feasible options for suspended ceilings have been explored, but that even the least harmful option still results in an alteration to the proportions of the rooms and spaces affected (and the concealing of the historic cornice).

Advice on preferred option

While it is appreciated that all of the options have taken into account the need to minimise harm the option which is least likely to cause the most harm, in the Council's view, is Option 1 in conjunction with Option 2, i.e. the strengthening of the floors and associated fire-rating works within the floor voids.

These works directly address the cause of the issue (the lack of strength in the existing floor) and therefore the harm is directly related to the need for the harm. While the fabric of the building is certainly of significance, the fabric within the floor structure is concealed from view and the harm to significance (as far as general public experience of the building goes) would be lesser than the creation of a suspended ceiling.

The rooms of the building are generally quite light on decorative detail, as is typical of terraced houses of this period. The majority of decorative detail is found on the skirting, window and door architraves and the cornice, i.e. it chiefly accentuates the proportions of the rooms. Altering the proportions of the rooms, and the resultant need to replicate the historic detail of the cornice in the

“wrong” location dilutes one of the key elements of the significance of the listed building in terms of its fine interior proportions. Bearing in mind that the bedrooms also have consent for ensuite bathrooms, it is all the more important that the historic ceiling level remains in order for the original proportions of the room to provide breathing space around modern interventions.

The works of floor strengthening and associated floor void works are therefore considered to be the option which causes the least harm to the significance of the listed building. There will be harm to historic fabric but there would be less harm to architectural and historic character (as experienced on a daily basis) than under the suspended ceiling works.

There are parts of the building (at second and third floor) where suspended ceilings already exist. They were installed in 1978 with listed building consent. The replacement of existing suspended ceilings with fire-rated suspended ceilings would be acceptable in these locations as the impact on significance would be neutral.

Areas of historic cornices are proposed to be stripped of layers of paint, which is welcomed. Should any areas of historic cornice be found to be decayed beyond repair then replication by use of moulds would be accepted for such sections.

The floor coverings are a mixture of C20th boards and what appear to be C19th boards. All C19th boards will need to be re-used in the rooms where they are located, but there is no requirement to re-use C20th boards and these can be either re-used or replaced with new pine boards.

Listed Building Consent application information

On the basis of the works shown in the pre-application documents planning permission will not be required (internal works only).

Should you choose to submit a listed building consent application which addresses the outstanding issues detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Listed Building consent Application
- 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’
- Section drawings at a scale of 1:50 labelled ‘existing’ and ‘proposed’
- Section and elevation drawings (where existing and as proposed) of any ceiling and joinery alterations at an appropriate scale
- Design and access statement (including justification for the works-i.e. fire safety)
- Heritage statement
- The appropriate fee

Please see supporting information for planning applications for more information.

As the works relate to internal works to a GII listed building there is no need to publicly advertise the works. However, there may be a requirement to consult Historic England if the works are deemed to fall under the following definition:

b) a proposal to demolish any principal internal element of the structure including any staircase, load bearing wall, floor structure or roof structure is treated as a proposal for the demolition of a substantial part of the interior.

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Draft issued: 23 November 2023

Draftv2 issued: 23 November 2023

Final issued: 30 November 2023

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