

The  
Heritage  
Practice

10 Bloomsbury Way, London WC1A 2SL  
+44 (0)20 3871 2951  
[www.theheritagepractice.com](http://www.theheritagepractice.com)  
[info@theheritagepractice.com](mailto:info@theheritagepractice.com)

Heritage Impact Appraisal  
50-51 Russell Square, London WC1B 4JU

December 2023\_v1





## 1 Introduction

1.1 This Appraisal has been prepared to support an application for planning permission at nos.50-51 Russell Square, London WC1B 4JU.

1.2 The application site consists of an office building, dating from the early 1960s and designed by Gerald Shenstone & Partners. It replaced two original early 19<sup>th</sup> century houses at nos.50-51 Russell Square.

1.3 The proposals are for a new façade treatment to main building; enlarged roof extension, reopening of lightwell to front; demolition of two storey outrigger and replacement with three storey plus plant enclosure, single storey infill extension to existing car park and, erection of full height stair core extension to rear and reconfiguration of entrance steps and ramp.

1.4 In line with paragraph 194 of the National Planning Policy Framework, this appraisal will define the significance of the site and its contribution to the character and appearance of the Bloomsbury Conservation Area. This assessment has been made in line with the heritage values set out in Historic England's 'Conservation Principles' (2008) and the criteria contained within Historic England's document 'Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (2016).

1.5 The appraisal will describe the proposals for the site and their impact upon the host building and any surrounding designated or non-designated heritage assets. The scheme will then be assessed against the relevant statutory, national, regional and local heritage policy framework.

1.6 Desk based and archive research, combined with a visual inspection of the site and wider area have been utilised in order to produce this appraisal, which should be read in

conjunction with drawings and supporting information prepared by Garnett Architecture.

## 2 Site and surroundings

2.1 Russell Square is located in the heart of Bloomsbury and forms part of the sequence of large, formal garden squares which characterise the area.

2.2 The application site sits at the corner of Bedford Place and the SE side of Russell Square and once contained two early 19<sup>th</sup> century townhouses. These were replaced in the early 1960s with the current office building.

2.3 Much of the surrounding context consists of early 19<sup>th</sup> century townhouses, including those which flank the application site along the SE side of Russell Square and in its southern corner, around the junction with Montague Street.

2.4 The east side of Russell Square is dominated by the Russell Hotel (Grade II\*) built in a flamboyant example of the French Renaissance style, with extensive use of terracotta decoration. Further south is the Imperial Hotel, which replaced a grandiose late 19<sup>th</sup> century building of the same name, also designed by Charles Fitzroy Doll, the architect of the Russell Hotel. The current hotel building dates from the 1960s and has a sculptural, corrugated concrete façade, with bands of projecting windows bays.

2.5 To the north and west of Russell Square are a number of landmark buildings, which differ significantly in terms of their form, scale and design from the surrounding early 19<sup>th</sup> century townscape. These include Denys Lasdun's Institute of Education on Bedford Way (Grade II\*), his Philips Building for SOAS (Grade II\*) and Charles Holden's Senate House (Grade II\*). However, given their distance from the application site and the effect of intervening buildings and the dense mature trees within



Russell Square, these do not form part of the setting of the application site.

## Heritage Designations

### The Bloomsbury Conservation Area

2.6 The application site is located in the Bloomsbury Conservation Area which was first designated in 1968. The conservation area is notable as an exemplary example of Georgian town planning with its layout of garden squares and inter-related streets and mews. Despite its size, it also displays a notable consistency in terms of its street pattern, spatial character and predominant building forms.

2.7 The Bloomsbury Conservation Area is very large and consequently is divided into 14 separate character areas. Russell Square is located within Sub Area 6: Bloomsbury Square/Russell Square/Tavistock Square. This sub area is situated to the east of the British Museum and includes the formal group of garden squares - Tavistock Square, Russell Square and Bloomsbury Square - along with their connecting streets.

2.8 The Bloomsbury Conservation Area Appraisal and Management Plan was adopted on 18 April 2011. In relation to the overall character of Sub Area 6 the Appraisal notes that:

*This sub area is largely made up of three- and four-storey late 18th and 19th century terraces surrounding a sequence of linked formal spaces, namely Bloomsbury Square, Russell Square and Tavistock Square. A series of north-south vistas visually connect the three squares. Moving through the area, there is a transition between the enclosed, urban nature of the streets and the more open squares which are softened by trees and green landscape. (para 5.79).*

2.9 The Appraisal refer to nos.50-51 Russell Square as 'a modern block with a

glazed facade that is of a similar scale to the terraces' in the text relating to Sub Area 6. The building is however listed under Detractors/Opportunity sites' on page 138 of the Appraisal.

### Statutorily Listed Buildings

2.10 The existing building is not statutorily listed, nor is it included on the Council's Local List (2015).

2.11 The site is surrounded by a number of statutorily listed buildings. These include the remainder of the attached terrace to the SW of the site, located at nos.44-49 Russell Square (Grade II) and the corresponding terrace to the east of Bedford Place at nos.52-60 Russell Square (Grade II). To the south, the buildings which line both sides of Bedford Place are Grade II listed. Russell Square itself is a Designated Park & Garden (Grade II) and sitting within that and to the north of the application site is the Grade II listed statue of Francis Russell the 5<sup>th</sup> Duke of Bedford.

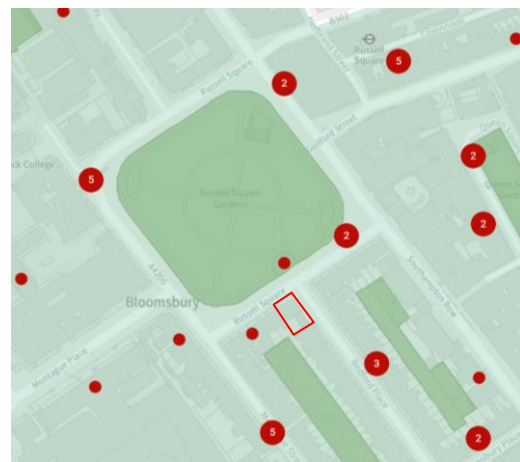


Figure 1: Map denoting designated heritage assets. Listed buildings are marked with red dots. The Bloomsbury Conservation Area is highlighted in light green and designated open space in dark green. The application site is shown outlined in red.





### 3 History and development of the site

3.1 The Bedford Estate began to develop its land for housing from the mid 17th century onwards, when the 4th Earl of Southampton laid out Bloomsbury Square in 1665 as a piazza for his mansion, Bedford House. To the rear of Bedford House were its private landscaped gardens, beyond which the land to the north was left open in order to preserve the Duke's views from the house.

3.2 In 1759 Southampton Row was extended northwards to meet the New Road (Euston Road) and terraced housing began to creep beyond Bedford House, eventually becoming the east side of Russell Square. This development included standard terraces as well as Baltimore House, built for the 6th Baron Baltimore in 1763. This would eventually be subsumed into Russell Square until its demolition in 1910.



Figure 2: Horwood's map of 1799.

3.3 Bedford House itself was demolished in 1800 and new development was planned for the open fields to the north, under the charge of James Burton the renowned builder-developer. Horwood's map of 1799 shows the area immediately prior to the laying out of Russell

Square. A lease for the south side at nos. 44-51 was agreed in June 1800 and the houses were in place by 1803. The west and north sides of the square followed between 1807 and 1813. The central garden was laid out by the eminent landscape gardener, Humphrey Repton.

3.4 Archive plans for the proposed houses on the south side of the square show a palace front to the design, with the end houses at nos.44-45 and 50-51, as well as the centre two houses having a sheer attic storey. The intervening buildings had a mansard concealed behind a bottle balustrade. The end houses are shown as 5 bays wide on the drawing however as built, they were reduced in scale to a more standard three bay pattern, as shown on the 1895 photograph of the terrace.

3.5 The first Bedford Estate survey in which the building appears is that for 1866 and then again in 1900. These plans show a closet wing to the eastern bay of no.50 and the link block to the rear of no.51, filling the space between the rear of the building and the northern flank wall of no.21 Bedford Place.

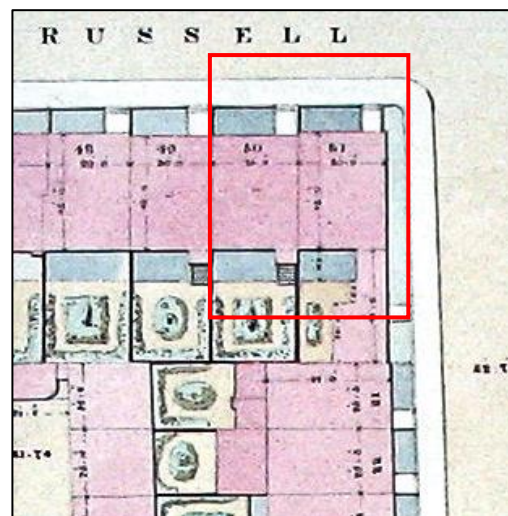


Figure 3: The site as depicted on the A General Atlas of the Estate belonging to His Grace the Duke of Bedford in the Liberty of Westminster and County of Middlesex, surveyed 1866. [Bedford Estate archive ref. BI-P121, Plate 15].



3.6 In 1899, the terrace was modified to the specifications of the architect Philip E Pilditch. This included terracotta embellishment to the entrance porches and windows, as well as terracotta banding above the 2<sup>nd</sup> floor window heads of the taller buildings within the composition. The chimneystacks were raised, and prominent French Second Empire type mansard roofs were added, with steeply pitched slopes and tall dormer windows with segmental and triangular pediments.

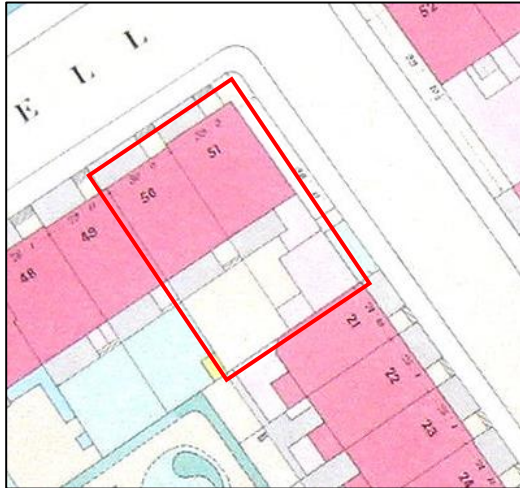


Figure 4: The site as depicted on Plans of the Estate belonging to His Grace in the County of London, surveyed in 1900. [Bedford Estate archive ref. BI-P122, Plate 17].

### The current building

3.7 The two original early 19<sup>th</sup> century houses at nos.50-51 were demolished in the early 1960s and the sites amalgamated. The new office building was designed by Gerald Shenstone & Partners with car parking to the rear. The basement of the new building contained an electricity sub-station.

3.8 A more detailed description of the current building and an assessment of its significance is contained at section 4 of this Appraisal.



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*Elevation of one Wing for the South side of Ansell Square*  
(No 1.)

*Wm. and John  
Ramsay  
Edinburgh*



*Figures 5 & 6: Elevations of the South Side of Russell Square. Taken from the Building Contract for building on the West side of Southampton Row, East and West sides of Bedford Place and the south side of Russell Square (nos. 44-51 & 52-60), and East and part of West side of Montague Street (excluding Bedford Office), between the Duke of Bedford and James Burton. 24.6.1800. [Bedford Estate archives ref. LE-BC151] (top) and photograph of nos.48-51 Russell Square taken in 1895. [Bedford Estate archives ref. LE-Phx2 No. 19] (bottom).*





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Figure 7: Image showing nos.44-51 Russell Square looking SE and taken in 1956. The 1899 works are clearly visible and the image shows that nos.50 and 51 matched the corresponding end houses at nos.44-45.

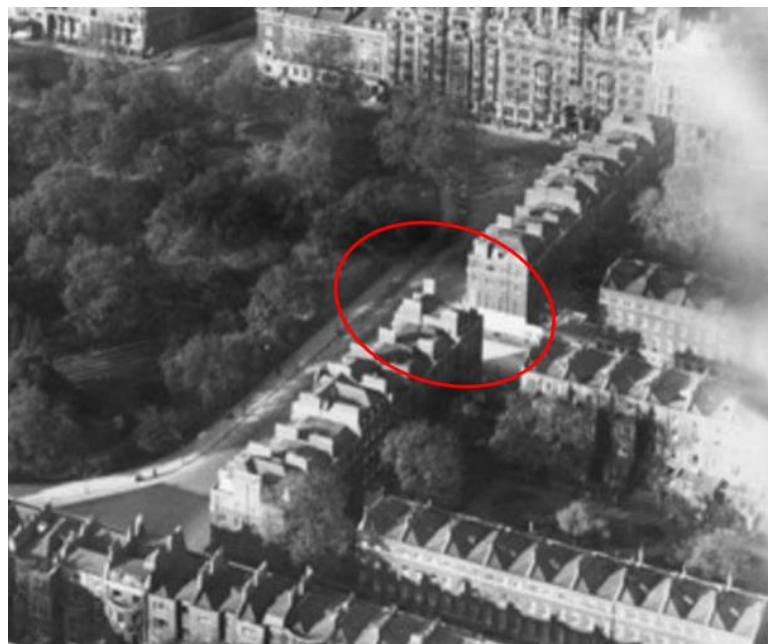


Figure 8: An aerial photograph of the site shows the massing of the late 19<sup>th</sup> century added mansard roof which provide additional bulk to each end of the terrace.



## 4 Significance of the site

4.1 The National Planning Policy Framework Annex 2 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.”*

4.2 A heritage asset is defined as *“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 asset includes designated heritage assets and assets identified by the local planning authority (including local listing).”* In this case the designated heritage asset is the Bloomsbury Conservation Area and any buildings within it which contribute positively towards its character and appearance.

4.3 Historic England’s document ‘Conservation Principles – Policies and Guidance for the sustainable management of the historic environment’ (2008) identifies a series of values that can be attributed to a heritage asset and which help to appraise and define its significance. Paragraph 3.3 of the document outlines that:

*“In order to identify the significance of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:*

- *who values the place, and why they do so*
- *how those values relate to its fabric*
- *their relative importance*
- *whether associated objects contribute to them*
- *the contribution made by the setting and context of the place*
- *how the place compares with others sharing similar values.”*

4.4 In assessing the significance of nos.50-51 Russell Square it is therefore necessary to

examine its history, form, architectural design, layout, materials and relationship with surrounding buildings. In making this assessment, consideration has been given to its intrinsic architectural merit, its completeness, the extent of any alterations and their impact, the contribution of the building to the character of the area and the degree to which the building illustrates aspects of local or national history.

4.5 The current building on the site dates from the early 1960s and was built to provide modern, open plan office space. It replaced a pair of early 19<sup>th</sup> century townhouses which formed part of the wider group at nos.44 – 51 Russell Square.

4.6 The building was designed by Gerald Shenstone & Partners, a multi-disciplinary practice which was established in 1920. By the later 20<sup>th</sup> century, the practice had expanded to include architects, interior designers, planners and surveyors, offering professional services to clients in the land and property business.

4.7 The practice’s client base was wide and there is no apparent specialism in any one sector or in relation to a particular building typology. During the second half of the 20<sup>th</sup> century the practice worked on a number of projects within the Bloomsbury Conservation Area, ranging from the restoration of early 19<sup>th</sup> century townhouses on Tavistock Place, through to residential schemes and office development, such as that at no.50-51 Russell Square. Consequently, the existing building on the site is not part of a recognised specialty or idiom for the practice and is a standard speculative mid 20<sup>th</sup> century office development.

4.8 The building is of five main storeys, with a setback 6<sup>th</sup> storey, with a plant room above that. The building is typical of commercial and office developments of the period, with curtain walling to a concrete sub structure.

4.9 Its front facade to Russell Square has bands of glazing, with shallow spandrel panes





beneath them, divided by concrete mullions. Each floor plate is delineated by a band of small grey mosaic tiles.

4.10 The flank façade to Bedford Place is highly prominent within the streetscene due to the corner position of the building, the width of the surrounding streets and the open character of Russell Square. This is clad in brown brick, laid in stretcher bond. The façade has a single bay of windows which take the form of high-level slots at 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> floor levels, creating a rather hostile character to this elevation.

4.11 The ground floor façade is similar to both Russell Square and Bedford Place with rather chunky framed metal windows set into horizontal apertures. The former lightwells to the building have been infilled and there is a ramp providing access into the building via the main entrance, which is situated adjacent to no.49 Russell Square.

4.12 To the rear of the building is a subordinate wing with its main elevation facing Bedford Place. This is two storeys in height and setback from the flank building line of nos.50-51 as well as the front building line of no.21 Bedford Place to the south. This has a similar architectural treatment to the front façade at 1<sup>st</sup> floor level. However, the ground floor has only a perforated screen and a vehicular access to the car parking behind, creating a low quality, harsh appearance to this part of the building, with no natural surveillance.

4.13 The existing building is of a standard commercial design of the period, with its strong sense of horizontality, flat roof and use of expressed concrete. Whilst it is acknowledged that mid 20<sup>th</sup> century architecture specifically rejected historicist style and detailing in favour of new architectural trends and approaches, this does create a rather jarring contrast with the immediately surrounding townscape, which is characterised by its early 19<sup>th</sup> century townhouses. The uniform floor to ceiling heights of the building, its strong sense of horizontality and the absence of articulation and visual

interest at roof level are all at odds with the character of the adjacent terraces. The use of expressed grey concrete, dark brown brick and grey mosaic tiling banding provide a rather unwelcome contrast with the warmer and richer tones of the original weathered yellow London stock brickwork, terracotta embellishment and cream painted stucco of the adjacent terraces. Furthermore, the amalgamation of nos.50 and 51 have resulted in a wider building than its neighbours and a lack of vertical distinction between the original plots.

4.14 The existing building is identified by the Council in their adopted Bloomsbury Conservation Area Appraisal and Management Guidelines as making a negative contribution/detracting from the character and appearance of the conservation area (page 138). This document was adopted in 2011 and whilst it is reasonable for buildings to be periodically re-appraised when development proposals arise, it is not considered that attitudes to mid 20<sup>th</sup> century architecture have shifted considerably in the intervening 12 years since the Appraisal was produced.

4.15 The Council have indicated as part of the pre-application discussions that the use of particular materials on the building have “*parallels with eminent post-war listed buildings in the conservation area, such as Sir Denys Lasdun’s Institute of Education located on the north side of the square and Sir Patrick Hodgkinson’s Brunswick Centre a short distance away to the north-east.*” Whilst it does have some elements of expressed concrete, this was an incredibly widely used material during the mid 20<sup>th</sup> century and the quality of the building and its finishes fall well below those of the cited buildings. This is particularly the case at the Institute of Education which is rightly listed at Grade II\* and where the extensive areas of exposed concrete, with its shuttered markings are a fundamental component of its architectural interest.

4.16 Furthermore, the Council draw parallels with the Imperial Hotel on the east side of Russell Square, suggesting that “*...both buildings share*



*similar floor to ceiling heights and proportions, employ metalframed windows, and are faced in concrete and brown brick with some fine detailing.” Whilst there are some superficial resemblances between the buildings, the Imperial Hotel is a highly individual building, with its sculptural front façade and corrugated effect created by the repetition of projecting window bays.*

4.17 By comparison, the building at nos.50-51 Russell Square does not employ any architectural innovation in terms of its form and layout, or the composition of its facades, which have standard strips of glazing, with spandrel panels beneath, a combination used widely during the 1950s and early 1960s. It is however agreed that the building’s facades are “*relatively quiet and well-mannered*” as the Council suggest, but that this equates to no more than a neutral contribution to the character and appearance of the Bloomsbury Conservation Area.

4.18 It is worth noting that other work by Gerald Shenstone & Partners within the Bloomsbury Conservation Area, including the building at nos.10-40 Ridgmount Street in Sub Area 5 is also not identified as making a positive contribution to the character and appearance of the conservation area.



Figure 9: Nos.10-40 Ridgmount Street in Sub Area 5 of the Bloomsbury Conservation Area.

## Values and significance

4.19 As referenced at paragraph 3.16 above, Historic England’s ‘Conservation Principles’ identifies four values that can be attributed to a heritage asset. These have been examined in turn below.

### Evidential Value

This value is derived from the potential of a place to yield evidence about past human activity (para 35) and is generally closely associated with archaeological sites and remains, with age being a strong indicator of evidential value.

In this case the building provides us with little in the way of unique evidence about past human experience. The building dates from the early 1960s and was constructed as a speculative office development. Any evidential value it has relates to changing patterns of use in this part of London and the requirement for new, open plan office space during this period as a replacement for older and outdated accommodation.

### Historical value

Paragraph 39 of the Conservation Principles document outlines that “*Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.*”

The site was redeveloped in the early 1960s and destroyed the first phase of development on the site which related to the original layout and composition of Russell Square. The amalgamation of the two historic plots has also eroded the historic integrity of the site.

The building itself is of limited age or historic value.

### Aesthetic value

Aesthetic value is defined as “*...the ways in which people draw sensory and intellectual stimulation from a place.*”



As described in the paragraphs above, the building dates from the early 1960s and is of a fairly standard commercial character for the period. Whilst it is 'of its time' in terms of its style, façade treatment, materials and detailing, it is of limited intrinsic architectural value. Given the character of the surrounding townscape, which is dominated by early 19<sup>th</sup> century townhouses, the building strikes a discordant note. The amalgamation of the two original plots, its strong sense of horizontality, absence of articulation at roof level and the use of a palette of materials which contrasts with the warm, rich tones of the surrounding buildings detracts from its architectural contribution to the area.

The ground floor treatment to the rear element facing Bedford Place is of very poor quality, with a lack of activity and natural surveillance.

#### **Communal value**

This value is derived from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience of memory. In this case, any communal value would be 'social', defined at paragraph 56 as *".....places that people perceive as a source of identity, distinctiveness, social interaction and coherence."*

The building has some very minor communal value in so far as it has been part of the local scene for around 70 years and has thus featured in the day to day lives of those who live, work and pass through the area. This communal value however is local in its focus and the building does not have any particular regional or national symbolism or value.

4.20 The Bloomsbury Conservation Area Appraisal and Management Guidelines (2011) identifies the building as detracting from its character and appearance.

4.21 Historic England document *'Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1* (2016) sets out ways to manage change in

conservation areas and includes a useful checklist to assist with identifying whether a building makes a positive contribution to the historic and architectural character of a conservation area. These criteria are listed below with accompanying responses.

#### **Is the building the work of a particular architect or designer of regional or local note?**

Response: No. The building was designed by Gerald Shenstone & Partners who have undertaken other restoration and new build work within the Bloomsbury Conservation Area during the second half of the 20<sup>th</sup> century, however the practice is not of any particular local or regional note.

#### **Does it have landmark quality?**

Response: No. The building occupies a prominent site on the corner of Russell Square and Bedford Place. However, the site was not originally intended to form a 'landmark' within the townscape, being simply the final house in a uniform terrace where a secondary road leads into a garden square. The current building does draw attention to itself due to its architectural contrast with the surrounding early 19<sup>th</sup> century townhouses.

#### **Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?**

Response: No. The fundamental character of the Bloomsbury Conservation Area relates to its exemplary Georgian town planning and the spatial relationship between its sequence of grand garden squares and the inter-related secondary streets and mews. The architectural coherence and consistency of the townhouses which line these streets is also a key component in the character and appearance of the conservation area. The application building does not share characteristics with this original/early phase of development.

The conservation area does also contain many later buildings of significance individual interest and quality, many of which are statutorily listed. The application building does superficially share





some of the characteristics of the mid 20<sup>th</sup> century buildings, such as the use of modernist horizontality, strips of glazing and expressed concrete. However, these have not been employed at the application site with any demonstrable quality or innovation.

**Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?**

Response: No. The building replaced the original early 19<sup>th</sup> century houses on the site in the early 1960s and is reflective of architectural trends and styles of the mid 20<sup>th</sup> century. This period specifically rejected historicist styles and detailing and there is thus a strong and marked contrast between the building and its early 19<sup>th</sup> century neighbours.

**Does it contribute positively to the setting of adjacent designated heritage assets?**

Response: No. The building forms part of the setting of the early 19<sup>th</sup> century houses on the SE side of Russell Square. However, due to its contrasting architectural style and materiality and the lack of any demonstrable intrinsic architectural quality in its own right, it is not considered to contribute positively to this relationship.

**Does it contribute to the quality of recognisable spaces including exteriors or open spaces with a complex of public buildings?**

Response: No. The original early 19<sup>th</sup> century townhouses around Russell Square contribute to the historic and architectural integrity of this grand late Georgian set piece architectural composition. However, the current building dates from the early 1960s and disrupts the uniformity of the SE side of the square, detracting from the setting of the public gardens at its centre.

**Is it associated with a designed landscape eg a significant wall, terracing or a garden building?**

Response: No

**Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?**

Response: In part. All buildings by their very existence form part of, and illustrate, the development of the settlement. To a small degree the existing building illustrates the piecemeal redevelopment of sites in central London during the mid 20<sup>th</sup> century and the changing pattern of use, as buildings originally constructed as grand single family houses gave way to commercial and office development.

**Does it have significant historic association with features such as the historic road layout, burgage plots, a town park or a landscape feature?**

Response: No. The site forms part of the perimeter of Russell Square and therefore historically has an association with its development in the early 19<sup>th</sup> century. However, the original buildings were replaced by the current office building in the 1960s and this has no direct historic association with the garden square.

**Does it have historic associations with local people or past events?**

Response: There are no known historic associations with local people or past events of note.

**Does it reflect the traditional functional character or former uses in the area?**

Response: In part. Russell Square was laid out in the early 19<sup>th</sup> century as a residential development, surrounded by grand houses aimed at the aristocracy. This pattern of use has inevitably changed over time, with the houses converted to hotels, University halls of residence and small offices. The replacement of the original houses with a speculative office development forms part of a later phase in the evolution of the conservation area and is thus part of its changing pattern of use over time.

**Does its use contribute to the character or appearance of the area?**



Response: In part. The pattern of use in this part of the conservation area is varied and there are few wholly residential buildings remaining which might reflect the original pattern and character of use.

#### Summary

4.22 The Council are clear in their pre application response received on 27 November 2023 that the identification of the current building at nos.50-51 Russell Square as a negative contribution to the character and appearance of the Bloomsbury Conservation Area “...is likely to have been made because the building did not meet the criteria found in Historic England guidance on assessing the contribution of buildings to conservation areas.” This was because “...it belongs to a later swathe of development than original buildings fronting Russell Square and would have been seen to be a building which did not relate well to its Georgian neighbours because of its greater height and bulk, inappropriate scale and proportions, and use of unsympathetic materials.”

4.23 This assessment is considered to be accurate. The existing building dates from the 1960s and is of limited historic value. Whilst it reflects architectural styles of the period, it is not of any notable quality in terms of its execution, detailing or use of materials. Indeed, its distinctive style and appearance are at odds with the character of the surrounding early 19<sup>th</sup> century townhouses and strikes a discordant note given the otherwise uniform townscape along Bedford Place and the SE side of Russell Square.

## 5 Assessment of the proposals

5.1 This section will describe the proposals and assess their impact upon the host building, the character and appearance of the Bloomsbury Conservation Area and the setting of any surrounding statutorily listed buildings. It will go on to assess the proposals in relation to the statutory, national, regional and local heritage policy framework.

5.2 The proposals are for a new façade treatment to main building; enlarged roof extension, reopening of lightwell to front; demolition of two storey outrigger and replacement with three storey plus plant enclosure, single storey infill extension to existing car park and, erection of full height stair core extension to rear and reconfiguration of entrance steps and ramp.

5.3 Several rounds of pre application discussion and negotiation have taken place with the Council to agree an acceptable approach for the site and the most recent response received on 27 November 2023 confirms that “The design has improved significantly over the course of the pre-application advice and feedback has been provided iteratively. Broadly speaking, officers are now content with the massing, design of the facades and roof extension.”

### Front and Flank Façade Design

5.4 The proposals will retain the existing structure of the building, allowing for its high levels of embodied energy to be maintained, but with the existing façade treatments removed and the building reclad. This will improve its appearance and better reflect and respond to the character of the surrounding early 19<sup>th</sup> century terraces, whilst still maintaining its essential architectural characteristics.

5.5 Initial feedback from the Council in early 2023 suggested that proposals for the building should ensure that “...its original architectural treatment is still legible, both in terms of its overall scale and proportions and its materiality.”



5.6 The proposed architectural approach has focused upon a re-working of the building's original characteristics, whilst improving the quality of its materials and detailing to better respond to its surrounding context. This will allow the site to remain legible as a later phase of development within the conservation area. The Council have considered this to be successful, noting in their pre-application response of 27 November 2023 that *".....design efforts have concentrated on celebrating the qualities of the existing building whilst allowing it to function as a contemporary office building and, where possible, improving the conservation area."*

5.7 The new façade treatment will be in a blended stock brick, which reflects the materiality of the surrounding townscape. The building's consistent floor to ceiling heights will remain expressed to the front façade, with horizontal bands of glazing. This reflects the original horizontal emphasis of the building, as well as responding to horizontality on surrounding early 19<sup>th</sup> century buildings, created by features such as the 1<sup>st</sup> floor balconies and their cast iron railings, the incised stucco to the ground floor facades and the terracotta window heads and terracotta banding to the 1<sup>st</sup> and 2<sup>nd</sup> floor windows on the adjacent terrace. The individual panes of glazing will be set within a grid pattern of horizontal and vertical elements, faced in contrasting GRC. This will have a deeper and more articulated band to the parapet, creating a strong termination to the façade and replicating the effect of a traditional cornice.

5.8 The ground floor façade will receive additional emphasis, with a wide GRC band beneath the 1<sup>st</sup> floor windows. The apertures at ground floor level will be increased in size, with stone pilasters between them. This will distinguish the ground floor from the upper storeys and creating a more balanced appearance when compared with the currently rather mean proportions of the openings. Together the proposals will provide a 'base' to the architectural composition in a similar manner to the effect of the incised stucco ground floor

frontages of the surrounding early 19<sup>th</sup> century buildings.

5.9 The front elevation at lower ground floor, visible within the lightwell, has also been refined to augment the impression of a base to the architectural composition. This has been achieved through a widening of the GRC piers and a heavier transom between the lower ground floor and ground floor façade to create a more solid demarcation.

5.10 The front elevation has also been revised to extend the glazing over to the western party wall with no.49 Russell Square. This will address the existing rather abrupt transition between the 1960s façade and the adjacent listed building, creating a more balanced overall appearance to the front façade.

5.11 The flank wall of the building will also be remodelled, improving its appearance on this prominent corner site. During pre-application discussions the Council expressed a preference for the flank wall to remain close in design and fenestration arrangement to the existing building. To that end the window bay is in the same position as the current apertures. However, the windows now take the form of vertically proportioned openings, arranged in pairs. These have a GRC lining to their deep reveals, creating a sense of articulation and depth. The proposed fenestration is considered a significant improvement over the existing windows, which currently present as rather mean, high-level slots at 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> floor levels, and are more in keeping with the vertical proportions and alignment of the windows on the surrounding townhouses.

5.12 At ground floor level the flank façade will be significantly improved, with larger areas of glazing, which retain the pattern of four equally spaced bays, but provide a more distinct 'base' to the composition, as well as increased passive surveillance.

5.13 At roof level the brickwork of the flank façade rises above the parapet, creating the





sense traditional slab chimneystacks, containing the development at roof level and providing an appropriate visual termination.

5.14 Overall, the proposed flank wall treatment will be sympathetic and broadly traditional in appearance, reflecting the character of other flank walls within the conservation area.

5.15 The proposed remodelling of street facing elements will retain the intrinsic architectural characteristics of the current building, including its consistent floor to ceiling heights and a sense of horizontality derived from its bands of windows. The 1960s grain of the site remains expressed, whereby two townhouses were merged to form one building. This maintains the distinction between the site and the surrounding early 19<sup>th</sup> century houses and its legibility as a later element within the streetscene.

5.16 At the same time, the proposals also seek to respond to the surrounding context through the use of brickwork of a more contextual colour and tone, which better reflects the blended stock brick used on many of the surrounding historic buildings. The proposals will retain the original structure of the building and its embodied energy, whilst allowing for a significant upgrade to the thermal performance of the façade cladding. Overall, the building will be updated and modernised in a high-quality manner which maintains its understated presence within the conservation area and does not compete with the surrounding listed buildings. This is consistent with the Council's assessment of the existing building which is considered to be *"relatively quiet and well-mannered."*

#### Rear Extension and Rear Facade

5.17 The proposals also include the replacement of the building's two storey rear wing which faces onto Bedford Place with a new three storey structure.

5.18 The current front building line of this element, which is decisively set back from the rear façade of no.51 Russell Square and no.21 Bedford Place, will be retained. This will ensure that the new Bedford Place wing appears recessive within the streetscene. The rear building line will be pushed modestly to the west but will represent an approximately half width addition to the building, ensuring that it is fully subordinate.

5.19 The overall height of the infill will remain two storeys below the parapet line of no.21 Bedford Place and the host building, creating an appropriate sense of visual and physical subordination. A study has been undertaken of other structures and buildings in a similar townscape position on the roads leading off Russell Square (Appendix B). This shows several instances of two storey structures in this position. This includes at the SE end of Bedford Place, where the rear element is in line with the flank wall of the Grade II listed building at no.23 Bloomsbury Square, thus increasing its prominence, and to no.44 Russell Square where the rear section of the building is also in line with its flank façade and the front façade of the adjacent Grade II listed townhouse on Montague Street. What this study also shows is that the treatment of these rear infill buildings is not consistent or uniform on opposite sides of the road. Whilst the existing building at the application site is two storeys in height, the corresponding structure opposite and to the rear of no.52 Russell Square is a single storey.

5.20 Also within the Bloomsbury Conservation Area and within a townscape of a similar age and character are examples of two storey rear elements in the same position as proposed at the application site. These include the structures to the rear of no.11 Fitzroy Square, facing onto Fitzroy Street and to the rear of no.33 Fitzroy Square, facing onto Conway Street (see Figures 10 & 11).

5.21 These examples, along with those around Russell Square demonstrate that the proposed two storey replacement building can



be incorporated onto the site without harm to the surrounding buildings. It is of an appropriate massing for its position within the townscape and will maintain the visual primacy of the frontage building to Russell Square and the early 19<sup>th</sup> century townhouses along the western side of Bedford Place. Given that the structure in this position and directly facing it to the rear of no.52 Russell Square are already of different heights and completely different age, materials and style, the proposals are not considered to detract from any uniformity within the streetscene.



Figure 10: A two storey infill to the rear of no.11 Fitzroy Square.



Figure 11: A two storey infill with mansard roof to the rear of no.33 Fitzroy Square.

5.22 A simple architectural approach will be taken to the Bedford Place elevation, with

blended stock brick to match the proposed flank facade of the main building. Windows will be vertically orientated and will reflect the scale and proportions of the fenestration on the late Georgian properties along Bedford Place. The ground floor treatment of the main building will be continued around to Bedford Place, with cast stone cladding providing additional emphasis at ground floor level and the sense of a visual 'base.' The provision of an active frontage here will include a visually permeable, glazed entrance into the building in place of the current large vehicle entrance gate flanked by perforated brickwork screens. This will improve the appearance of this part of the site, as well as providing natural surveillance and vitality to the streetscene, representing a significant enhancement to the quality of the building.

5.23 A new stair tower is proposed on the rear elevation of the building. This stair tower is critical as it provides a separate fire escape from a number of other buildings within the terrace, a route which needs to be maintained. The stair tower will be set deep into the site in order to conceal it in any views from Bedford Place or Russell Square. The escape staircase enclosure echoes traditional closet wings, which are a feature of some of the early 19<sup>th</sup> century townhouses in the surrounding area, for example those at nos.21 and 23 Bedford Place. Furthermore, the stair enclosure is narrow in terms of its footprint and is subordinate to the overall scale and massing of the host building.

5.24 The undercroft and parking area at the rear of the building will be infilled in order to provide additional accommodation at ground floor level, with an external roof terrace provided to the 1<sup>st</sup> floor. Development at ground floor level over former rear yards and gardens is common throughout the Bloomsbury Conservation Area. For example, to the SW of the site the Grade II listed houses on the east side of Montague Street have a range of ground floor structures filling their former gardens. Notwithstanding this widespread pattern of development on listed townhouses within the area, the site itself is not statutorily listed. The ground floor extension to



the rear of the main building will be fully subordinate in terms of its height and massing and will have the benefit of providing an external terrace area at 1<sup>st</sup> floor level for the building's occupants. This will be of higher amenity value than the current areas to the rear of the building which are unattractive, particularly the undercroft.



*Figure 10: Aerial view looking NW showing the rear facades of the house on the east side of Montague Street.*

5.25 The rear parts of the Bedford Place element and the rear façade of the main building will be faced in the same brick as the street facing elevations. There will be simple punched openings creating a more domestic character here, in line with the surrounding early 19<sup>th</sup> century buildings, and an appropriate ratio of solid to void.

#### Roof addition

5.26 The 5<sup>th</sup> floor of the building will be remodelled, and its footprint enlarged, whilst remaining set back from the front and rear elevations. The flank wall of the roof addition will be physically and visually contained by the brickwork elements that rise above the flank façade, reading as slab chimneystacks.

5.27 The front elevation of the roof addition will be highly articulated, with projecting window bays, clad in metal. This will create an architectural distinction between it and the main floors of the building below, in a similar manner to the slate mansards on the adjoining early 19<sup>th</sup> century terraces. A setback from the front elevation behind the parapet will echo the traditional arrangement of roofs on the adjacent terrace and reduce its visual prominence from vantage points on Russell Square.

5.28 The rear facade of the new roof storey will be faced in brickwork, reading as part of the series of brickwork volumes below, but setback from the main rear elevation of the building. The current 5<sup>th</sup> floor accommodation is visible from Bedford Place and the proposed roof addition will have a similar visual relationship with the building beneath, appearing secondary in character. Whilst there is additional volume on the flank of the building, this is offset by the removal of the plant room, which currently sits above the 5<sup>th</sup> floor roof accommodation and is visible from Bedford Place.

5.29 The 1890s modifications to the terrace included the raising of the chimneystacks and the introduction of prominent mansard roofs and dormers. This can still be appreciated at no.44 Russell Square which has the same roof treatment as the demolished no.51. This architectural treatment of the roofscape would have provided significant height and an exuberant roof profile to this corner building and would have been highly visible from Russell Square and Bedford Place. The 1960s rebuild on the site re-emphasised the original attic parapet level to the buildings with the 5<sup>th</sup> floor structure as a recessive feature. The proposals will address and define the junction of Russell Square and Bedford Place in a more positive and emphatic manner, reflecting the treatment of the original buildings on the site before they were demolished.





## Public realm and ground floor treatment

5.30 The site originally had open lightwells to the front which matched those to the remainder of the terrace. The lightwells were covered over when the site was developed in the early 1960s and bollards introduced in order to deter parking. A ramp was subsequently added, providing Equality act compliant access into the building. This ramp currently forms a rather dominant and unattractive feature to the front of the building, due to its position and long, single gradient.

5.31 It is proposed to reinstate open lightwells on the Russell Square frontage. These will be bounded by simple black painted railings. The main entrance into the building will be relocated towards the centre of the frontage. This is more in keeping with the original position of the main entrance door to no.50 which can be seen on the 1956 historic photograph of the terrace. The reinstated open lightwell will reintroduce a traditional buffer zone between the pavement and the front facade of the building and will reflect and respond to the original pattern of development along the terrace.

5.32 A ramp will be retained in order to provide non-stepped access into the building however this will be reconfigured into a tighter footprint and will be integrated more effectively into the new frontage treatment. This will significantly reduce the prominence of the ramp at street level. Overall, the revised ground floor treatment will significantly enhance the appearance of the building at ground floor level and its physical and visual relationship to the public realm.

## Assessment of the proposals against the relevant policy framework

### Statutory duties – The Planning (Listed Buildings and Conservation Areas) Act 1990

5.33 The main issues for consideration are the effect of the proposals on the host building at nos.50-51 Russell Square and upon the character and appearance of the Bloomsbury Conservation Area. The impact on surrounding statutorily listed buildings must also be considered. The proposals are considered to comply with the s.66 and s.72 statutory duties.

5.34 The recladding of the building will retain the intrinsic architectural characteristics which distinguish it from its neighbours, and which reflect the particular evolution and history of the site. At the same time its materials and detailing will be improved in order to relate better to the surrounding late Georgian townhouses, and the ground floor treatment to the main building and to the rear wing will be enhanced, creating natural surveillance, vitality and a more attractive interface with the public realm.

5.35 The flank elevation to Bedford Place has been modestly remodelled, whilst retaining an appropriate degree of solid to void, referencing flank wall treatments elsewhere within the conservation area where they form a transition from primary spaces to secondary streets. The proposed fenestration arrangement improves upon the rather unattractive high level slot windows at the same time as better reflecting the scale and orientation of the windows on the surrounding townhouses.

5.36 The proposed rear addition will increase by a single storey in height, whilst maintaining the current front building line to Bedford Place. This will ensure that the new building is of an appropriate scale and level of visual subordination within the streetscene and in relation to both the frontage building and the listed building at no.21 Bedford Place.



5.37 Overall the proposals are considered to enhance the character and appearance of the Bloomsbury Conservation Area.

5.38 As a result of the appropriate design of the scheme, the setting of adjacent listed buildings will also be preserved. The distinction between the primary nature of the front façade and the secondary flank has been maintained and the modest increase to the height and scale of the rear element will respect the group of listed buildings along Bedford Place and remain visually subordinate. The remodelled front façade provides a subtle and respectful architectural response to the listed townhouses on Russell Square whilst maintaining key features of the current façade which distinguish it historically and architecturally from this first phase of development on the square.

#### National Planning Policy Framework 2023

5.39 The revised proposals will respond more appropriately to the character of the existing building and the wider townscape in terms of scale, massing, architectural styling, materiality and detailed design. The rear addition facing Bedford Place is suitably recessive and subordinate within the streetscene. This will ensure that the development relates positively to local character and contributes to local distinctiveness. As a whole the proposals will sustain the character and significance of the Bloomsbury Conservation Area and will comply with the requirements of the NPPF.

5.40 Paragraph 202 of the NPPF allows for any 'less than substantial harm' to a heritage asset to be weighed against the public benefits of the proposal. The Council have suggested in their pre application response received on 27 November 2023 that the increase in the height of the rear element of the building is considered harmful, *"albeit at the lower end of 'less than substantial'."* This harm is considered *"...to be partly outweighed by improvements that the remodelled building would bring, particularly the ground floor experience.....and a rationalised and*

*clean roof profile. It is noted that further potential benefits are achievable in sustainability and economic terms."* Whilst it is not agreed that the proposed rear building causes harm, it is considered correct that public benefits do flow from the development and that these include a demonstrable enhancement to the appearance of the building, its improved sustainability credentials and the economic benefit from the construction phase of the development.

#### Camden Local Plan 2017

5.41 For the reasons outlined in detail above, the proposed works are considered to comply with the relevant sections of policy D1 – Design and D2 – Heritage of the London Borough of Camden's Local Plan 2017. The proposals will be high quality in terms of materials and detailed design and will complement and respect local context and character. The scheme will preserve the character and appearance of the Bloomsbury Conservation Area and the setting of surrounding listed buildings and Russell Square itself, a Grade II Registered Park and Garden.

#### Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

5.42 The proposals are considered to comply with the policies contained within the Management Strategy. They will preserve the character and appearance of the Bloomsbury Conservation Area (para 5.28) and result in a high quality, contextual and sympathetic remodelling of this existing neutral/negative contributor (para 5.29).

5.43 The Conservation Area Appraisal formally identifies the building as detracting from character and appearance and thus para 5.30 should apply. The Council have since suggested that the building is more likely to make a neutral contribution. Nonetheless, the proposed scheme will update, upgrade and refresh a dated 1960s building in a manner which maintains its inherent character but subtly refines it to better



respond to the surrounding context of early 19<sup>th</sup> century townhouses.

#### The London Plan 2021

5.44 The proposals are considered to comply with the adopted London Plan (2021). The thrust of Policy HC1 - Heritage conservation and growth is that development proposals should conserve the significance of heritage assets. For the reasons outlined above, in this case the revised proposals are considered to conserve the character and appearance of the Bloomsbury Conservation Area and the setting of surrounding statutorily listed buildings.

## 6 Conclusion

6.1 The proposals are for a new façade treatment to main building; enlarged roof extension, reopening of lightwell to front; demolition of two storey outrigger and replacement with three storey plus plant enclosure, single storey infill extension to existing car park and, erection of full height stair core extension to rear and reconfiguration of entrance steps and ramp.

6.2 This Heritage Appraisal has assessed the significance of the existing building and its contribution to the character and appearance of the Bloomsbury Conservation Area. It has assessed the impact of the proposals on the host building, the Bloomsbury Conservation Area and the setting of surrounding listed buildings.

6.3 The current scheme reflects a long process of pre application discussion with the Council and has been revised and refined to address their detailed concerns. This includes comments regarding the fundamental design approach to the refurbishment and recladding of the building and the need for the proposed building to maintain a quiet, neutral presence within the streetscene.

6.4 The proposals retain key elements of the architectural character of the existing building and the features which distinguish it from its neighbours, including the consistent floor to ceiling heights and the sense of bands of fenestration. However, this has been overlaid and refined to reflect features from the surrounding late Georgian townhouses in terms of the tone and colour of the material palette and the form, profile and articulation of the roof storey, providing for a less stark contrast with its neighbours.

6.5 The rear element of the building which faces Bedford Place is considered of an appropriate scale and massing and will retain the current heavily setback building line. This will ensure that it reads as a subordinate element



within the streetscene. Significant enhancements will be secured to this area of the site as a result of improvements to the ground floor frontage and the replacement of the current hostile and unattractive vehicular entrance to the rear parking area.

6.6 The proposed roof addition has a similar visual relationship with the lower storeys as the existing building, appearing subordinate, ancillary and recessive in character. Mansards and heavily articulated roofscapes are a feature of this part of Russell Square and a visible uppermost storey is considered to be in keeping with the general pattern of surrounding development. Additional volume has been incorporated adjacent to the flank elevation of the building but this has been modelled in brickwork to refer to the prominent slab chimneystacks on surrounding buildings and to visually contain the remodelled roof storey.

6.7 The proposals will preserve the character and appearance of the Bloomsbury Conservation Area, and the setting of surrounding listed buildings, in line with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. They will also comply with the relevant sections of the National Planning Policy Framework 2023, the London Plan 2021, the London Borough of Camden Local Plan 2017 and the policies of the Bloomsbury Conservation Area Appraisal and Management Guidelines (2011).

## Appendix A – Relevant historic environment policy

### The Planning (Listed Buildings and Conservation Areas) Act 1990

A1 Section 66 of the Act requires that:

*“In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

A2 Section 72 of the Act requires that:

*“...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

### The National Planning Policy Framework 2023

A3 The revised National Planning Policy Framework 2023 (NPPF) sets out the Government's planning policies and how these are expected to be applied. There is a general presumption in favour of sustainable development within national planning policy guidance.

#### Paragraph 194

*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.*





#### Paragraph 195

*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

#### 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

#### 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.*

#### **The London Plan**

A4 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. Policy HC1 Heritage conservation and growth part C is relevant.

*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. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

#### **The London Borough of Camden Local Plan 2017**

A5 Camden's Local Plan was adopted on 3 July 2017 and sets out the Council's planning policies. The relevant parts of the policies have been cited below.

#### **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";*
- e. comprises details and materials that are of high quality and complement the local character;*

#### **Policy D2 – Heritage**

*"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.*

#### **Designated heritage assets**

*The Council will not permit development that results in harm that is less than substantial to the*



*significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.*

#### **Conservation areas**

*Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:*

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*

#### **Listed Buildings**

*Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:*

- k. resist development that would cause harm to significance of a listed building through an effect on its setting."*

#### **Bloomsbury Conservation Area Appraisal and Management Strategy (2011)**

A6 The Conservation Area Statement has a series of guidelines relating to new development within the Bloomsbury Conservation Area.

#### **Para 5.28**

Development proposals must preserve or

enhance the character or appearance of the Bloomsbury Conservation Area. This requirement applies equally to developments which are outside the Conservation Area but would affect its setting or views into or out of the area.

#### **Para 5.29**

High quality design and high quality execution will be required of all new development at all scales. It will be important that applications contain sufficient information to enable the Council assess the proposals.

#### **Para 5.30**

Proposals which seek to redevelop those buildings and spaces which are considered to have a negative impact on the special character or the appearance of the Conservation Area with appropriate new development will be encouraged.



The  
Heritage  
Practice

10 Bloomsbury Way, London WC1A 2SL  
+44 (0)20 3871 2951  
[www.theheritagepractice.com](http://www.theheritagepractice.com)  
[info@theheritagepractice.com](mailto:info@theheritagepractice.com)

Heritage Impact Appraisal  
50-51 Russell Square, London WC1B 4JU

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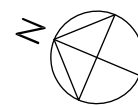
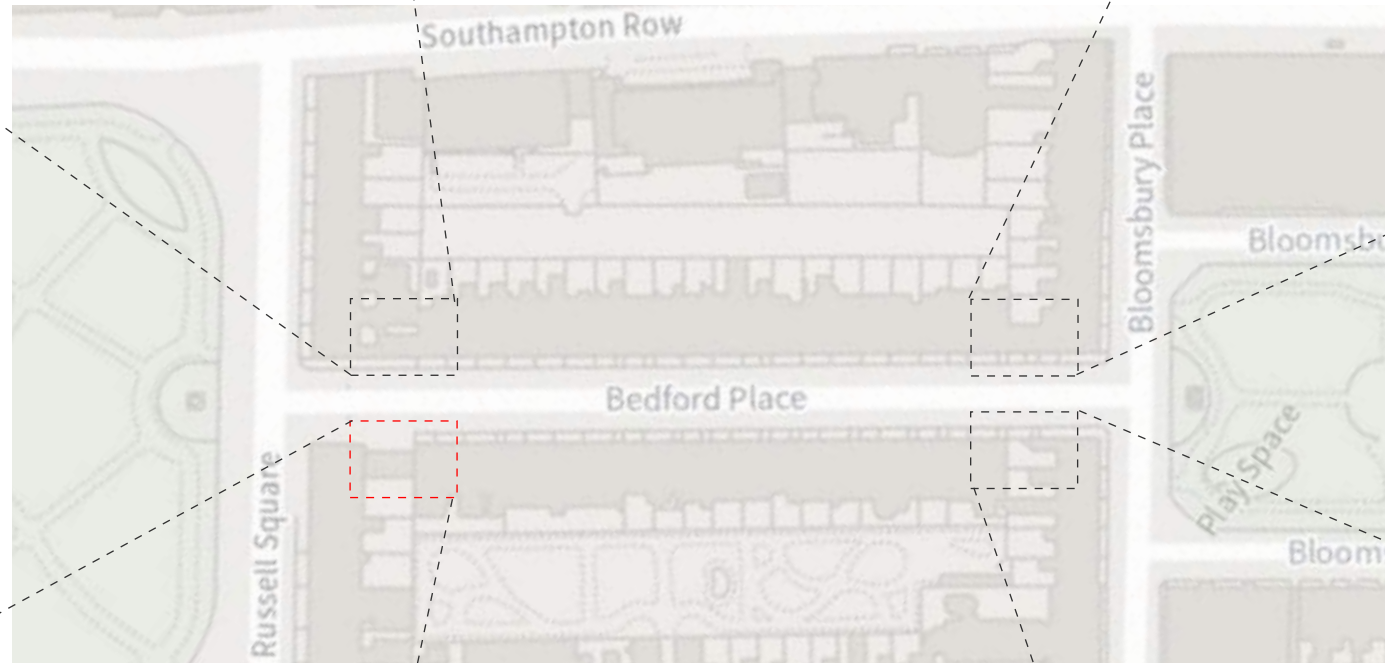
## Appendix B – Russell Square corner building study



Bedford Place - North East



Bedford Place - South East



Bedford Place - North West



Bedford Place South West





Stuart House



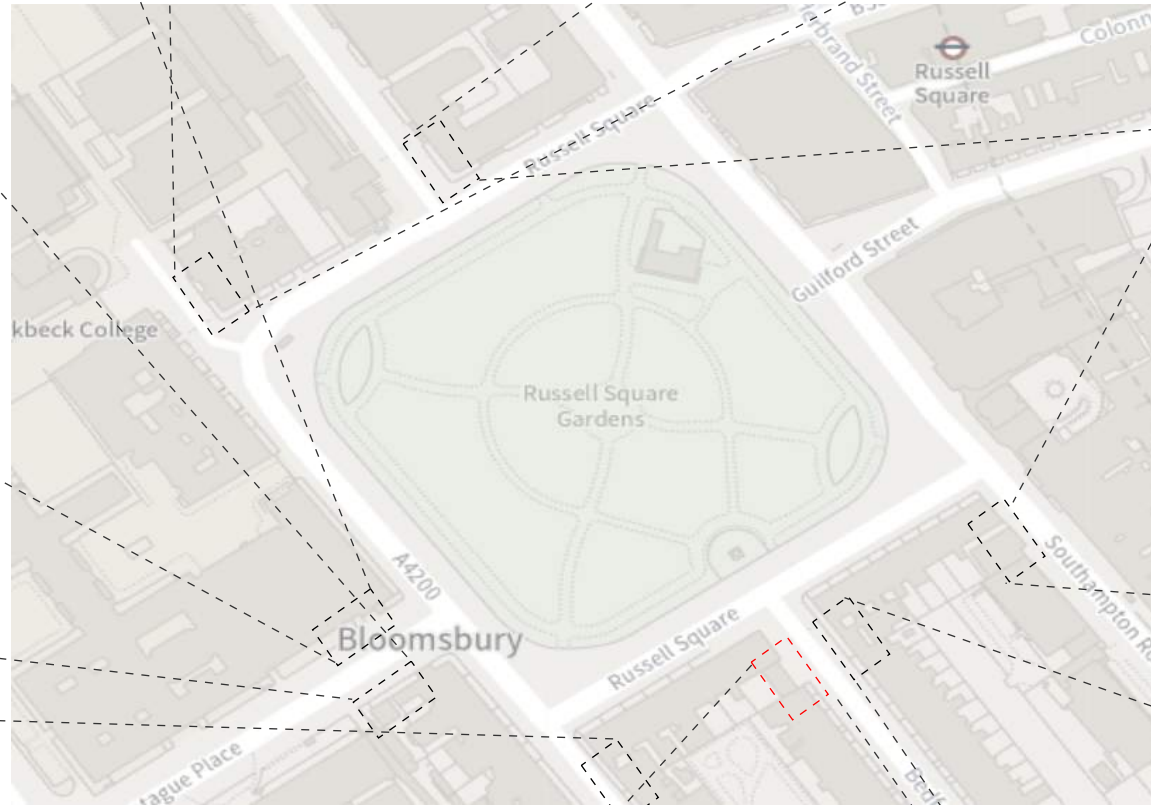
Russell Square 30/31



Russell Square 24



Russell Square 38 & Stuart House



Russell Square 60



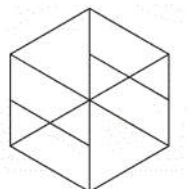
Russell Square 44



Russell Square 51-44



Russell Square 52



The Heritage Practice

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