



Donald Insall Associates
Chartered Architects and Historic Building Consultants

14 Bedford Row and 12-13 and 14 Jockey's Fields

Historic Building Report
For True North Management



Contact Information

Cordula Zeidler FRSA IHBC (Director)

E: cordula.zeidler@insall-architects.co.uk

T: 020 7245 9888

Duncan Gregory (Historic Buildings Advisor)

E: duncan.gregory@insall-architects.co.uk

T: 020 7245 9888

Louisa Hunt (Assistant Researcher)

E: louisa.hunt@insall-architects.co.uk

T: 020 7245 9888

London Office

12 Devonshire Street

London, W1G 7AB

www.donaldinsallassociates.co.uk

<i>Version:</i>	3.3
<i>Issue date:</i>	03 May 2024
<i>Prepared by:</i>	DG, LH
<i>Checked by:</i>	CZ
<i>Version description:</i>	Final for planning

This report and all intellectual property rights in it and arising from it are the property of or are under licence to Donald Insall Associates Limited. Neither the whole nor any part of this report, nor any drawing, plan, photograph, other document or any information contained within it may be reproduced in any form, including online, without the prior written consent of Donald Insall Associates Limited. All material in which the intellectual property rights have been licensed to Donald Insall Associates Limited, and such rights belong to third parties, may not be published or reproduced at all in any form, and any request for consent to the use of such material for publication or reproduction should be made directly to the owner of the intellectual property rights concerned.

Contents

1.0	Summary of Historic Building Report	1
2.0	Historical Background	4
3.0	Site Survey Descriptions	41
4.0	Assessment of Significance	51
5.0	Commentary on the Proposals	54
	Appendix I - Statutory List Description	57
	Appendix II - Planning Policy and Guidance	59

1.0 Summary of Historic Building Report

1.1 Introduction

Donald Insall Associates was commissioned by True North Management Ltd in November 2023 to assist them in developing proposals for 14 Bedford Row and 12-13 and 14 Jockey's Field, London.

The investigation has comprised historical research, using both archival and secondary material, and a site inspection. A brief illustrated history of the site and building, with sources of reference and bibliography, is in Section 2; the site survey findings are in Section 3. The investigation has established the significance of the buildings, which is set out in Section 4 and summarised below. Section 5 provides a justification of the scheme according to the relevant legislation, planning policy and guidance.

1.2 The Buildings, their Legal Status and Policy Context

14 Bedford Row, originally constructed in 1717 – 1718, re-fronted in the 19th century, and then war damaged, was rebuilt in 1967 and listed at Grade II seven years later in 1974. Numbers 12-13 and 14 Jockey's Fields are modern unlisted buildings to the rear of 12 to 14 Bedford Row. They are considered to make no contribution to the conservation area but to be of neutral value, and this is reflected in Camden's Conservation Area Appraisal. All three buildings are located in sub-area ten of the Bloomsbury Conservation Area in the London Borough of Camden. They are in the setting of the following listed buildings:

Bedford Row:

- Number 17 Bedford Row and attached railings (Grade II)
- Numbers 15 and 16 Bedford Row and attached railings (Grade II*)
- Numbers 8-13 Bedford Row and attached railing. Number 11 incorporating the former number 10 (Grade II*)
- Numbers 29-32 Bedford Row and attached railings (Grade II)
- Numbers 33-36 Bedford Row and attached railings (Grade II)

Gray's Inn

- Raymond Building number 1 to 6 and attached railings (Grade II)
- Gray's Inn registered park and garden (Grade II*)
- Gateway and walls to north and west of Raymond Buildings (Grade II)
- Gray's Inn gardens railings and wall on north side (Grade II)

Research for this report has confirmed that as modern structures neither 12-13 nor 14 Jockey's Fields can be considered as curtilage listed because of their construction date as well as being developed separately at the time. This is covered in more detail in section 4.1 below.

Alterations to a listed building generally require listed building consent; development in conservation areas or within the setting of a listed building or conservation area requires local authorities to assess the implications of proposals on built heritage.

The statutory list description of the listed building is included in Appendix I and a summary of guidance on the Bloomsbury Conservation Area provided by the local planning authority is in Appendix II, along with extracts from the relevant legislation and planning policy documents.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 16, 66 and 72 of the Act impose statutory duties upon local planning authorities which, with regard to listed buildings, require the planning authority to have '*special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses*' and, in respect of conservation areas, that '*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*'.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plans applicable to the Site are the Camden Local Plan (June 2017) and The London Plan (March 2021).

The courts have held that following the approach set out in the policies on the historic environment in the National Planning Policy Framework will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6). The key message of the NPPF is the concept of 'sustainable development' which for the historic environment means that heritage assets 'should be conserved in a manner appropriate to their significance'.

The NPPF recognises that, in some cases, the significance of a designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. The NPPF therefore states that any harm or loss to a designated heritage asset 'should require clear and convincing justification' and that any 'less than substantial' harm caused to the significance of a designated heritage asset should be weighed against the benefits of the proposal including, where appropriate, securing its 'optimum viable use'.

1.3 Summary Assessment of Significance

1.3.1 14 Bedford Row

A detailed assessment of significance with guidance on the relative significance of elements of fabric and plan form and the extent to which these elements are sensitive to alteration is included in Section 4.0 of this report. The following paragraphs are a summary explaining why the buildings are considered of nationally-important architectural and historical interest.

14 Bedford Row was designed in 1967 by C. H. Elsom & Partners as offices for the Chartered Society of Physiotherapy. The building was a speculative re-creation of the original Georgian Townhouse, built on this site in 1717-18, which had been altered in the C19. Its primary significance is in its front elevation, which is not a direct copy of the previous building on the site, but a recreation of an early-eighteenth century house, using details consistent with neighbouring properties. This includes the brick treatment of the window openings, the early eighteenth-century style of the window framing, the front door, fanlight and porch designs. Overall, this elevation is significant as part of a group of Georgian houses in the street which are also listed, and for this reason it also makes a positive contribution to the character of the building and of the conservation area.

The rear elevation of the building was reconstructed in entirely modern forms and bears no relation to the lost Georgian design. In contrast to its historic neighbours it is built of the same brick as the front elevation, laid in stretcher bond, with large window openings with concrete dressings, all at odds with the 18th century rear elevation that was lost. Recent replacement windows and a large modern fire escape detract further from its appearance. The rear elevation is detracting from the significance of both the listed building and the character and appearance of the conservation area.

The interiors of 14 Bedford Row were designed as modern office accommodation on a modern plan, without embellishments, and are of no architectural or historic interest.

Given its modern rear elevation and interiors, the special interest of the listed building lies only in its front elevation.

1.3.2 12-13 Jockey's Fields

12-13 Jockey's Fields was built in 1969 to designs on Burrough & Hannam, a relatively obscure practice of post-war architects, on the site of two Georgian stables buildings. It is a modernist interpretation of a mews building designed as offices. It retains wide openings on the ground floor including shutters and security bars which are of utilitarian character, and upper floors of concrete and brick with slate panels, divided into four bays. The set-back third floor is largely concealed from view and retains the scale of the mews. It is a competently-designed modernist building which overall makes a neutral contribution to the conservation area. The replacement windows, defensive front door, garage doors and overall neglected appearance are detracting features. The rear elevation is unattractive, and although only visible from surrounding buildings could be said to detract from the significance of the conservation area. The interiors are of no architectural or historic interest.

1.3.3 14 Jockey's Fields

14 Jockey's Fields was built in 1986 by an unknown architect in an unassuming Classical or Post-Modern style. The ground floor and window dressings are of a stone-like material, the upper floors are brick laid in a stretcher bond. As with the neighbouring 12-13 the third floor is set back to retain the scale of the mews. The building's materials and scale are appropriate for the character of the conservation area, but because of the lack of quality and imagination in its design the building makes a neutral contribution. The interiors are

of no significance. An internal plaque commemorating its opening by Princess Alexandra is of local interest, but its setting in an unattractive hallway has scope for improvement.

1.4 Summary of Proposals and Justification

The proposals for 14 Bedford Row and 12-13 and 14 Jockey's Fields are outlined in the drawings and Design and Access Statement by White Red Architects. The proposals aim to bring back into use a building that is currently unoccupied. To do this, the buildings will be converted from their original office function to apart-hotel usage. The proposals involve:

- Altering the interior layouts of all three buildings to provide smaller guest accommodation with private facilities;
- Reducing the extent of the plant enclosures from the roof of the rear range of 14 Jockey's Fields;
- Installing new plant enclosures on the roof of the Jockey's Fields buildings, set back so as to not be visible from street level;
- Removing a section of the roof of the rear range of 14 Jockey's Fields to create an inner courtyard garden;
- Infilling the existing small lightwell at the rear of 14 Bedford Row;
- Creating an external patio garden on the roof of the rear range of 14 Jockey's Fields.

It is considered that the proposals have been carefully designed to fully meet the legal requirements outlined above. The primary heritage consideration was to not

impact the significant front elevation of 14 Bedford Row, which has been achieved. The alterations to the internal layout would maintain existing floor levels, and partitions would not interfere with existing windows. The change to the use of the rooms may bring a minor benefit to the character of the conservation area. The major internal changes would not have any impact on heritage significance. The external changes to the Jockey's Fields buildings are designed to avoid causing harm and to provide a moderate benefit to the character and appearance of the Bloomsbury Conservation Area. The setting of nearby listed buildings will not be harmed.

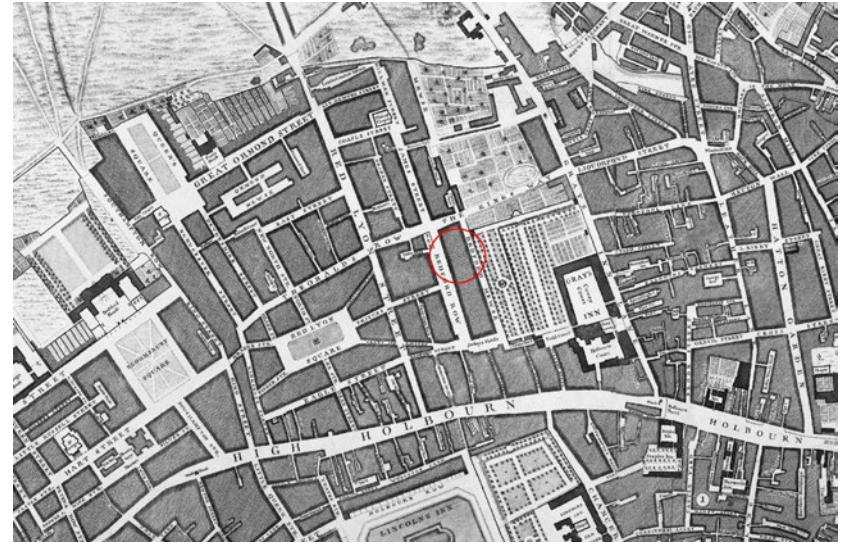
The proposals would sustain the significance of the listed buildings in accordance with paragraph 203 of the National Planning Policy Framework. Moreover, it is considered that the proposed works would preserve the special architectural and historic interest of the listed buildings and the character and appearance of the conservation area, in accordance with the statutory duties set out in Sections 16, 66 and 72(l) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposals would also accord with the policies in the Camden Local Plan and would bring an empty building back into use, re-purposing it to ensure its beneficial long-term and optimum viable use.

2.0 Historical Background

2.1 The Development of Bedford Row

2.1.1 Nicholas Barbon and the Early Development of Bedford Row

In the late 17th century the post-great-fire City of London was expanding north and westwards to merge with the City of Westminster and engulf the Inns of Court. West of Gray's Inn and north of Lincoln's Inn, a large tract of land owned by the Duke of Bedford was later developed as the Bloomsbury estate, but closer to the Inns – around Great Ormond Street and Lamb's Conduit Street – Rugby School held land that was developed at the turn of the 18th century by the building speculator Nicholas Barbon. He also built the houses on the west side of Bedford Row c.1690 on land owned by Bedford Corporation. Probably because of opposition from Gray's Inn (who had earlier battled with Barbon), the leases were not let until 1716, following which the east side of Bedford Row began to be developed as residential houses, mostly by George Devall, plumber and Robert Burford, carpenter. Rocque's map of 1746 shows that Bedford Row was developed by this stage, with its Mews buildings to the rear facing Gray's Inn Gardens [Plate 2.1]. Horwood's Map of London from 1792 – 99 shows the row in more detail, evidencing they were built as terraces with gardens to their rear [Plate 2.2].



2.1 1746 Rocque Map (Locating London)



2.2 1792 - 99 Horwood's Map (Romantic London)

2.1.2 The Rise of a Commercial Area in the 19th and 20th Centuries

In the 19th century, Bloomsbury became less desirable as a residential area with the construction of fashionable villa development to the north and west, such as Belsize Park and thus the houses in the area changed from residential dwellings to commercial buildings, often converted into offices. At the same time, University College was established and first opened in 1829, with buildings by Alfred Waterhouse, Hayer-Lewis and TL Donaldson erected throughout the century. By the late-19th century, according to *Old and New London*, the houses on Bedford Row had all been cut up into chambers occupied by solicitors and no. 12 was the head of the Entomological Society.¹ A photograph from 1908 of Bedford Row, with many letting signs showing they continued to be used as offices in the early-20th century [Plate 2.3]. With the decline of residential properties, railways, hotels and office developments arrived in Bloomsbury.

During World War II some of the houses on Bedford Row, especially on the west side, suffered badly during 1940-41 from incendiary bombs and twenty were burnt out. In recent years many have continued to be used as offices and some occupied by legal firm due to the proximity of Gray's Inn, and the mews at Jockey's Fields have also been used as offices and commercial buildings.



2.3 1908 Photo (London Picture Archive)

1 Ibid.

2.2 The Building: 14 Bedford Row

2.2.1 Original Building and Early Use in the 18th and 19th Centuries

14 Bedford Row was originally built between 1717 – 1718 as part of the speculative development by Nicholas Barbon described above. The Goad Insurance Plan from 1887 shows that by the end of the 19th century, the house was used as offices [Plate 2.4]. The plan shows that no. 14 was formed of four storeys plus basement with a slate roof; it reveals that the footprint comprised the main house, with two closet wings also of four storeys to the rear. The garden by this date had been built over with an extension to the former mews building which is described below in section 2.3. The OS Map revised in 1894 shows the footprint consistent with the Goad plan [Plate 2.5]. Charles Booth's poverty map of 1899 suggests that Bedford Row was occupied by the middle classes whereas the mews buildings along Jockey's Field had working class occupants, consistent with their use as coach-men's accommodation [Plate 2.6].

2.2.2 Early-20th Century

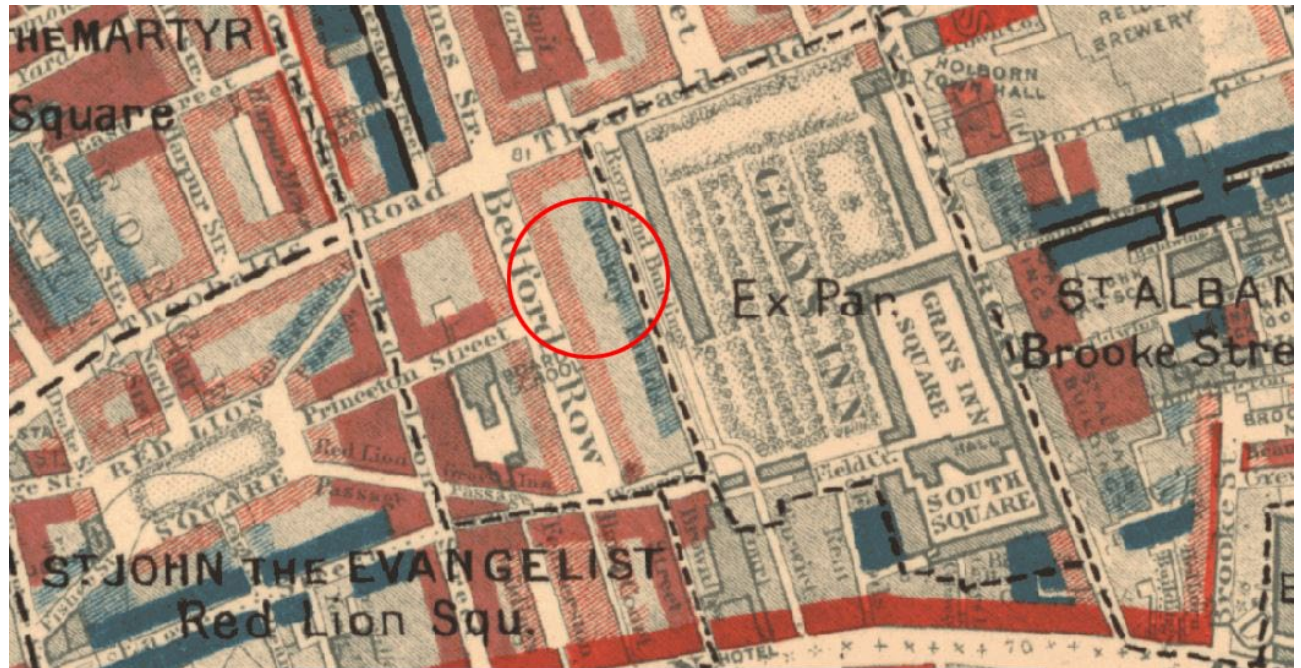
The first plan found of No. 14 is of the ground floor dating to 1911, revealing the original building comprised of four bays to its front and indicating that it was formed of a variation of the standard two-room planform, with hall and stairwell and smaller room to the south [Plates 2.7]. The rear closet wing had two-over-two sashes. The 1914 OS map shows the planform was consistent with the 1896 maps [Plate 2.8].



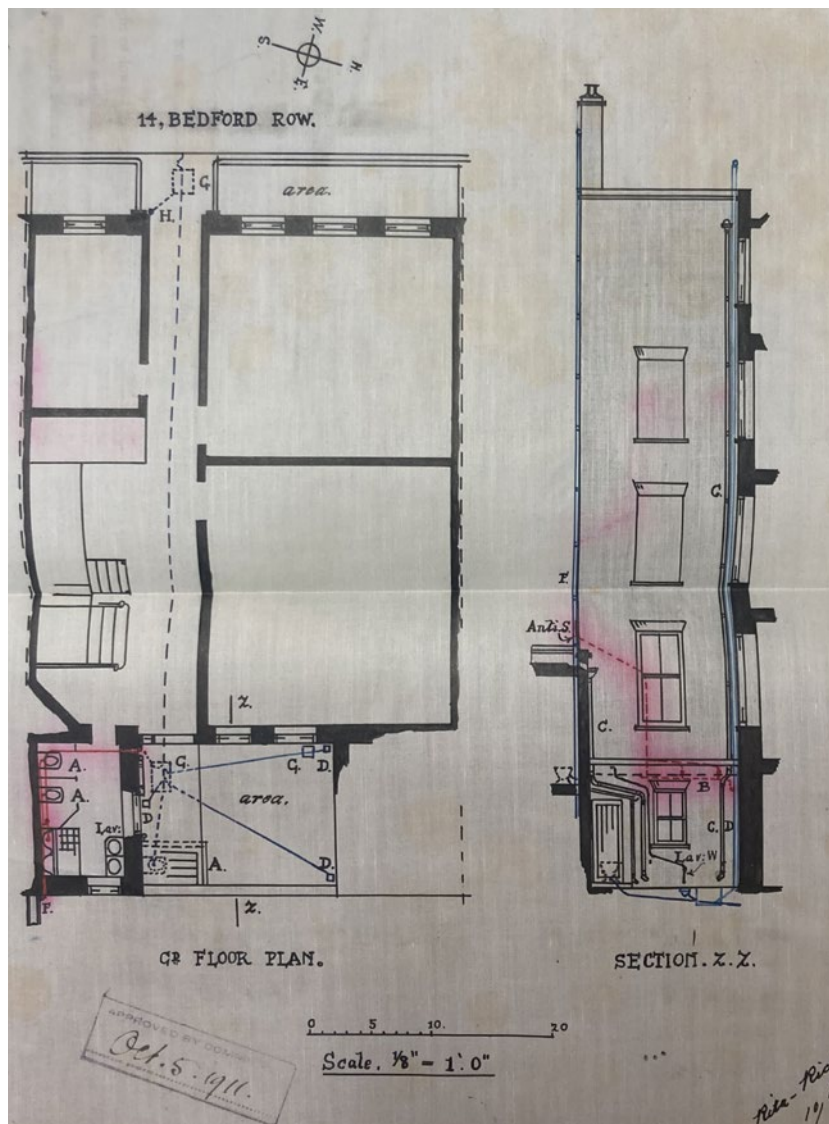
2.4 1887 Goad Insurance Map (Layers of London)



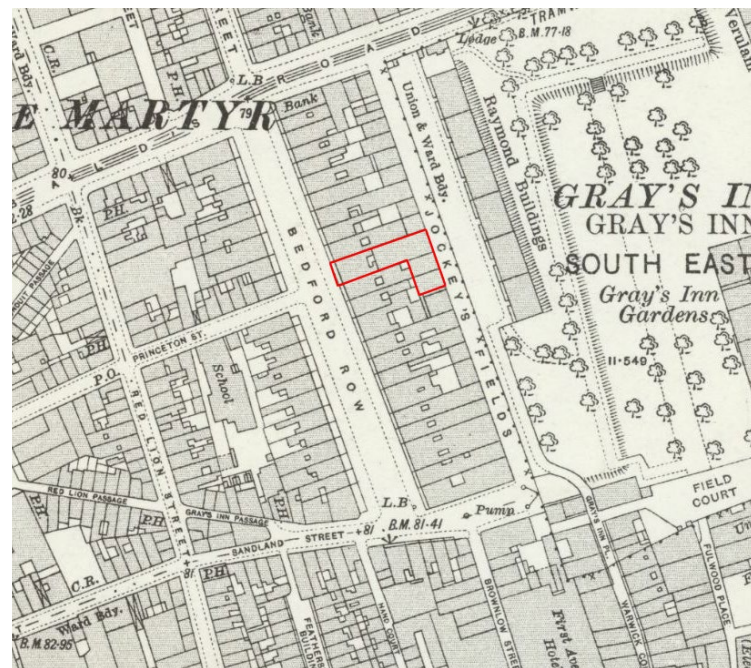
2.5 1894 Revised OS Map, Published 1896, London VII.54 (NLS)



2.6 1898 - 99 Booth's Poverty Map (LSE)



2.7 1911 Ground Floor Plan (Camden Local Archives)



2.8 1914 OS Map, Published 1936 London V. 10 (NLS)

2.2.3 Mid-20th Century

The London County Council bomb damage map shows that the building sustained general blast damage but there was no structural damage; it is shown shaded in orange [Plate 2.9]. The 1946 aerial photo confirms no damage to the roof [Plate 2.10]. The 1951 OS map shows that there were ruins to the north of Bedford Row but No. 14 remained seemingly extant [Plate 2.11].

2.2.4 Minor Alterations in the 1950s

In 1951, H.T. Oliver & Sons proposed additional sanitary installations which involved subdividing the rear of the second floor [Plate 2.12]. Although this was a minor alteration, the plans show the basement, second and part-third floor plan of the original building. In 1952, several partitions were erected throughout the building to subdivide the rooms [Plate 2.13]. This set of drawings is the first to show the full set of floor plans altogether.

A photograph from 1956 is the first view of the front elevation that has been found; it shows that at this date, the house still followed its early-18th century overall form but it had evidently been altered in the 19th century, with new dressings such as elaborate lintols and sills [Plate 2.14].



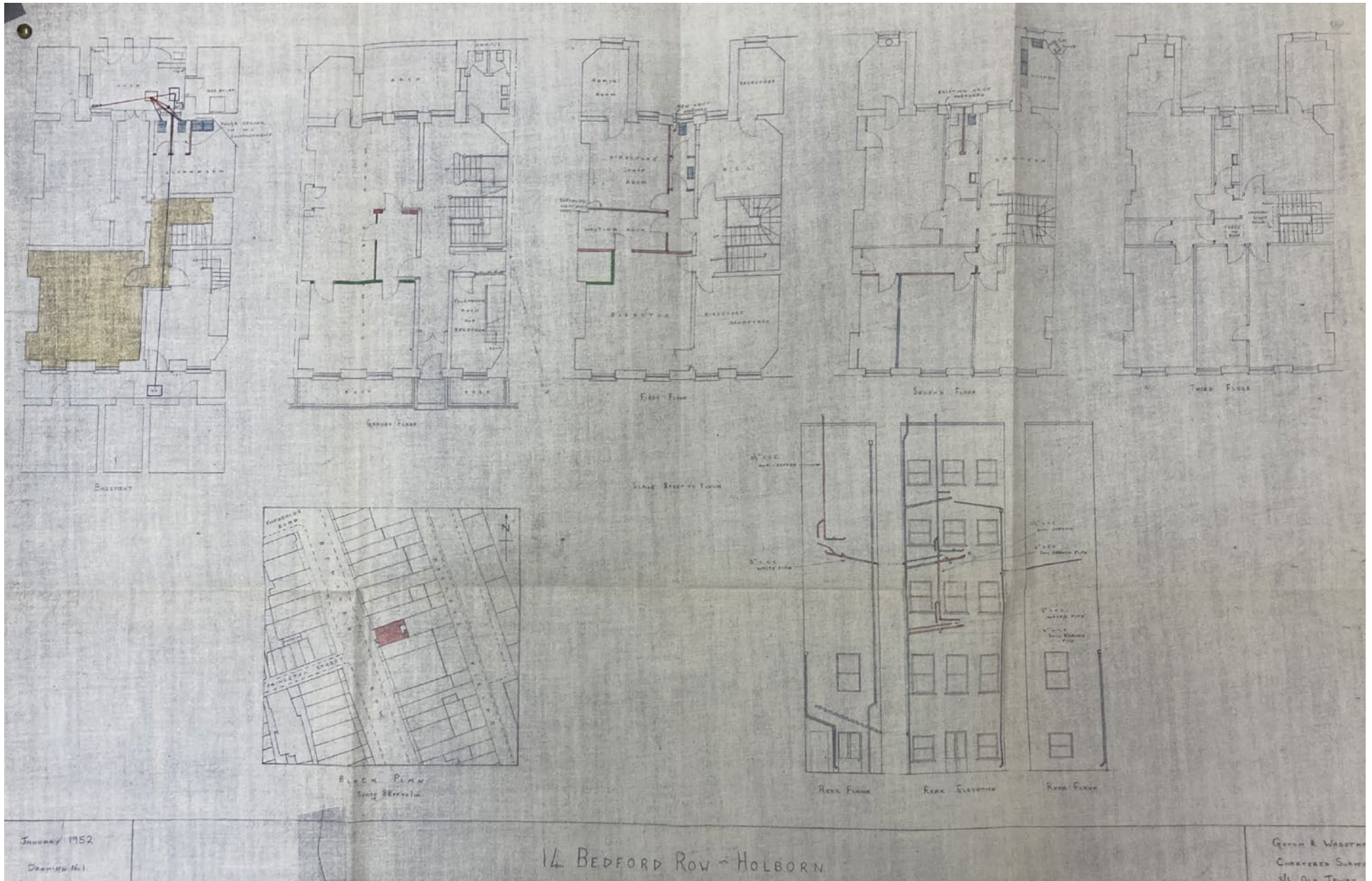
2.9 Bomb Damage Map (London County Council)



2.10 1946 Aerial Photograph (Historic England, EAW000619)



2.11 1951 Surveyed OS Map, Published 1953, TQ3081-A (NLS)



2.13 1952 Plans (Camden Local Archives)



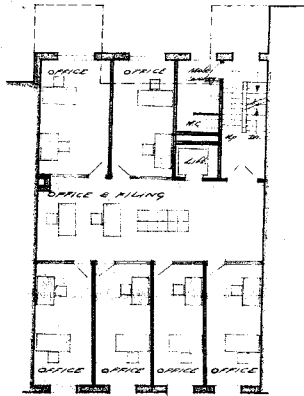
2.14 1956 Photo (London Picture Archive)

2.2.5 Rebuilding in 1967

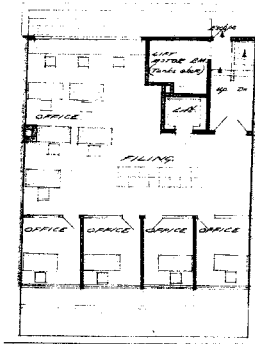
Planning permission was granted in 1963 to C.H. Elsom & Partners for the rebuilding of No.14 Bedford Row. The plans reveal the proposed new building comprised five storeys, plus basement, accommodating offices, however this scheme was not built **[Plate 2.15]**. The decision notice from 1963 placed conditions on the materials and joinery to the external elevations of the building. In addition, it was noted that although conditions could not be made for the retention of the staircase and chimney pieces, they were worthy of preservation and for the preparation of records for the Survey of London.

Photographs from 1967 show the 18th century staircase in situ, although building around it was in disrepair **[Plate 2.16 and 2.17]**. A further planning application and plans from 1967 confirm the building was entirely rebuilt at this date, erected with four storeys plus basement with stock brick and stone to match the previous building. Internally, original plan form was lost **[Plates 2.18 – 2.23]**. The basement was open-plan with subdivided rooms to the rear; the first floor comprised an open plan members room and council chamber; the upper floors were subdivided into offices organised around a central lobby and a lift overrun and plant room was erected to the roof. The plans show a stairwell and lift was inserted towards the rear of the building. Furthermore, the location of the entrance door had been changed from the second bay from the south to the first bay from the south and the design of the door, fanlight and moulded bracket of the canopy were detailed by Elsom and Partners **[Plate 2.24]**.

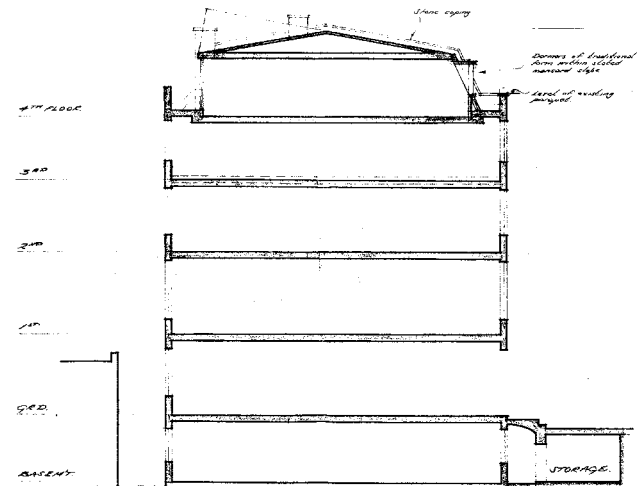
In 1974, this modern rebuilding of 14 Bedford Row was listed at Grade II.



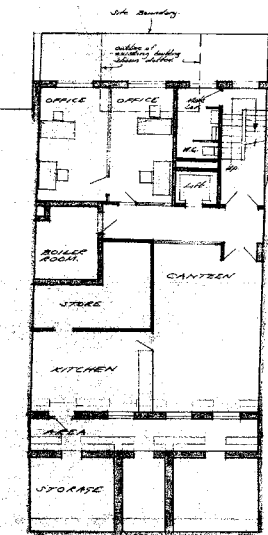
THIRD FLOOR



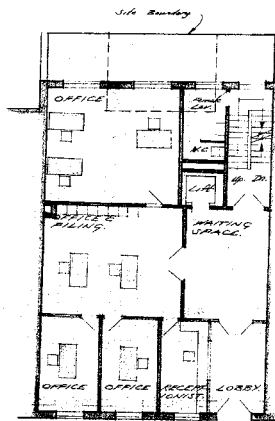
FOURTH FLOOR



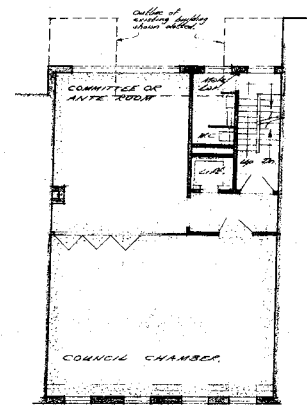
SECTION



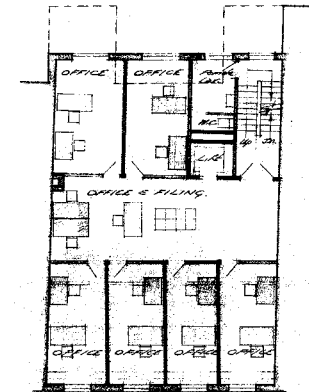
BASEMENT



GROUND FLOOR



FIRST FLOOR



SECOND FLOOR

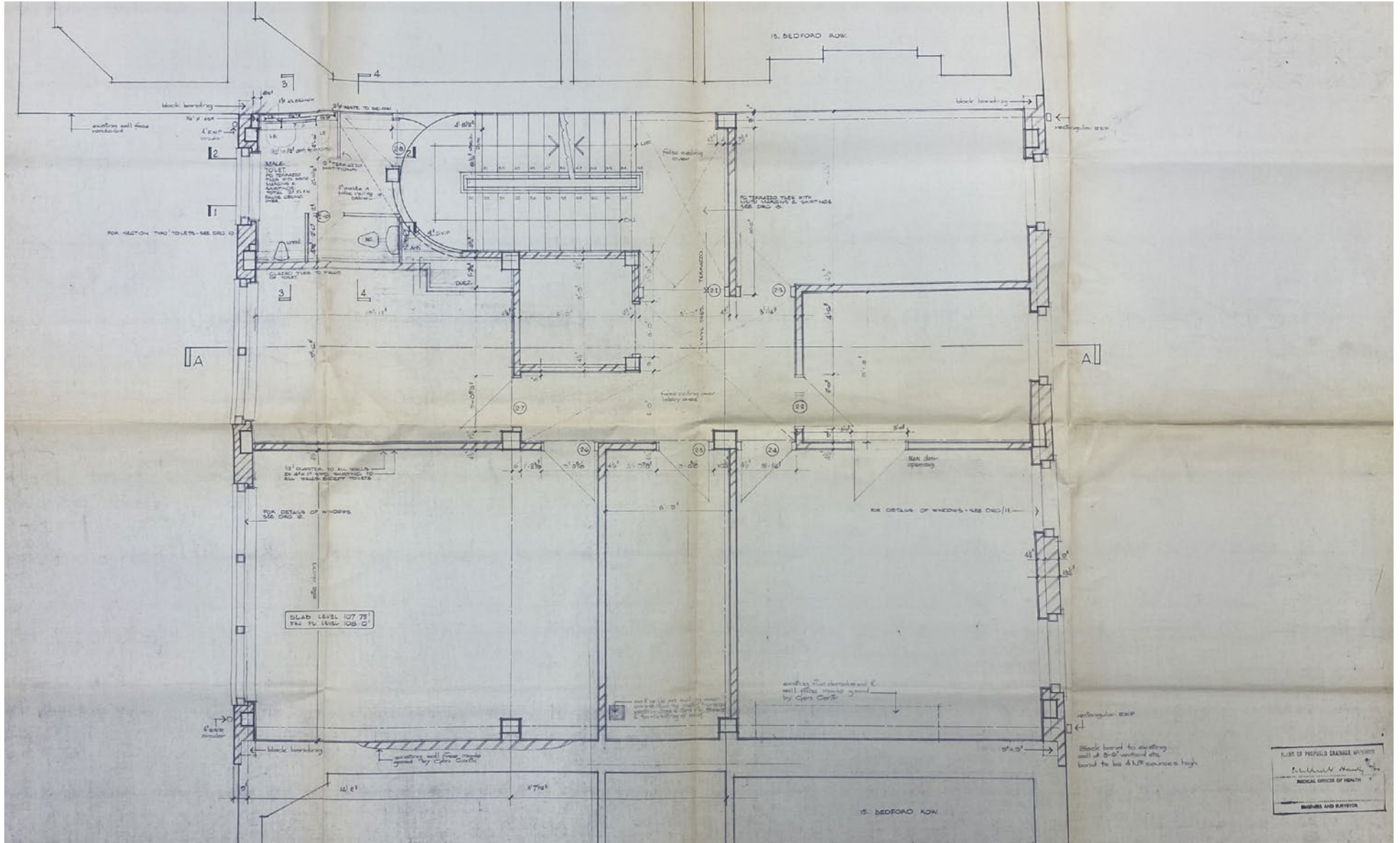
LONDON COUNTY COUNCIL
15833 18-10-63
ARCHITECT'S REGISTRY



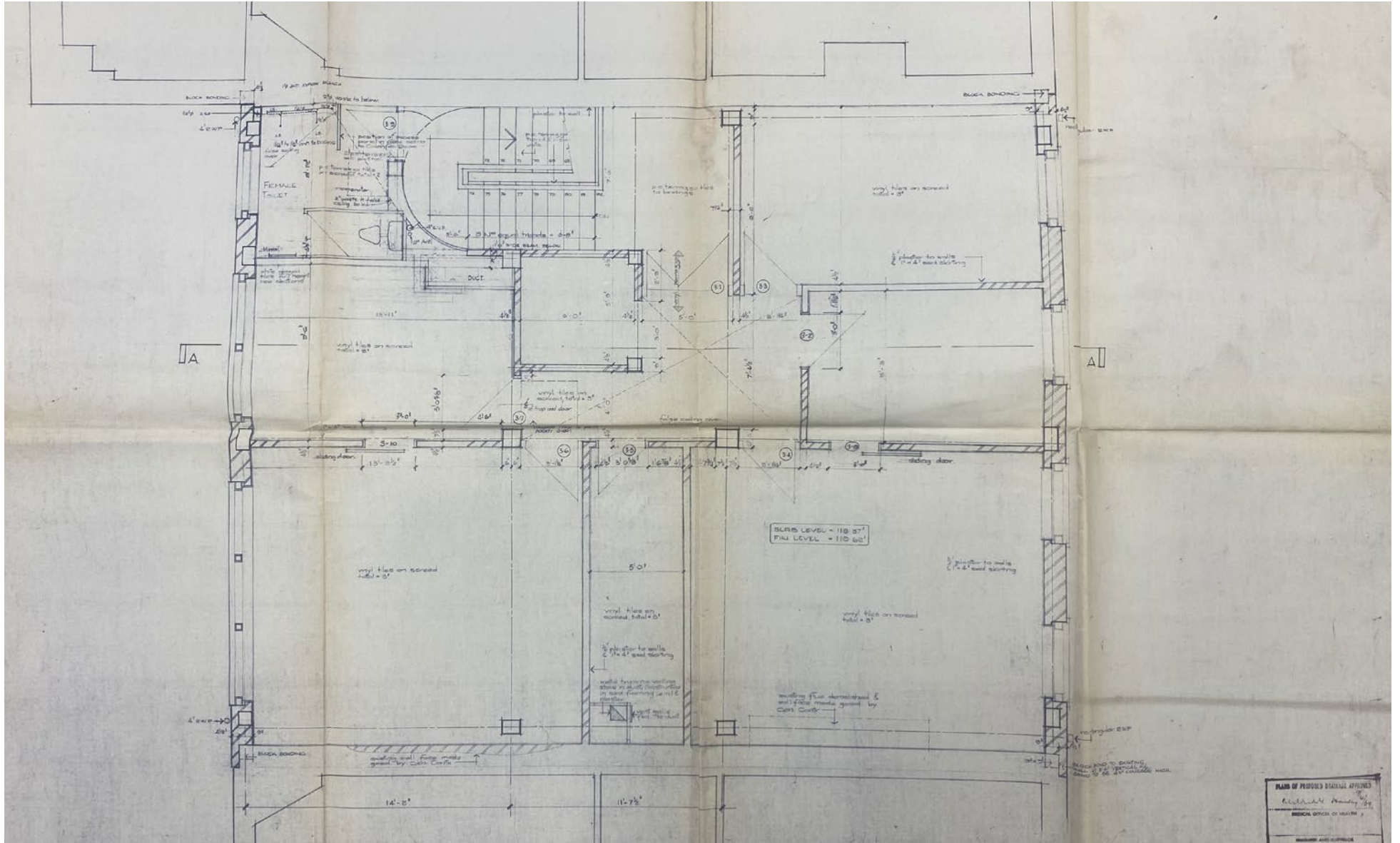
2.16 1967 Staircase (London Picture Archive)



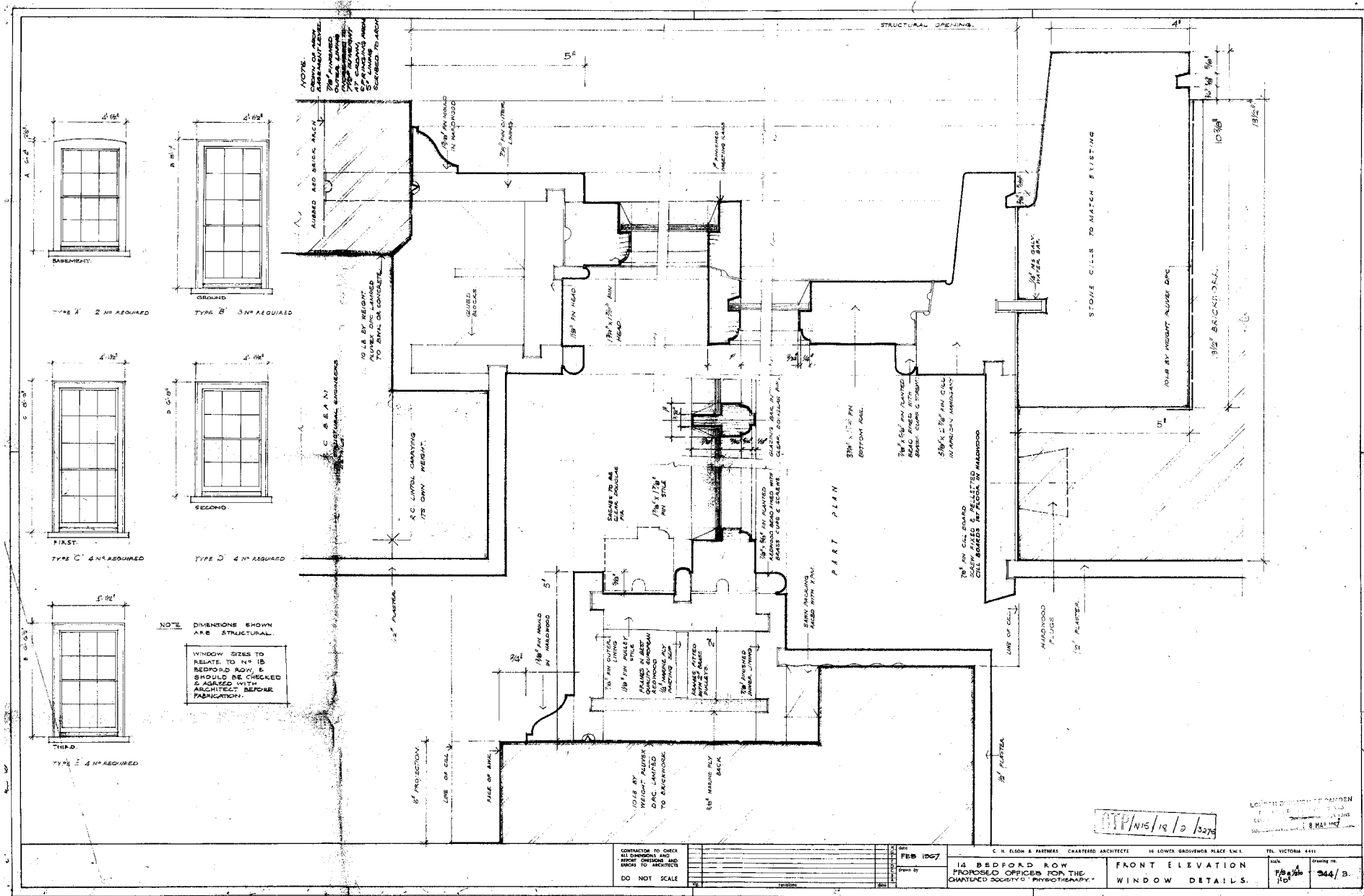
2.17 1967 Staircase (London Picture Archive)



2.21 1967 Second Floor Plan (Camden Archives)



2.22 1967 Third Floor Plan (Camden Archives)



2.24 1967 Detail of Door (Camden Planning Archives)

2.2.6 1980s and 1990s Alterations

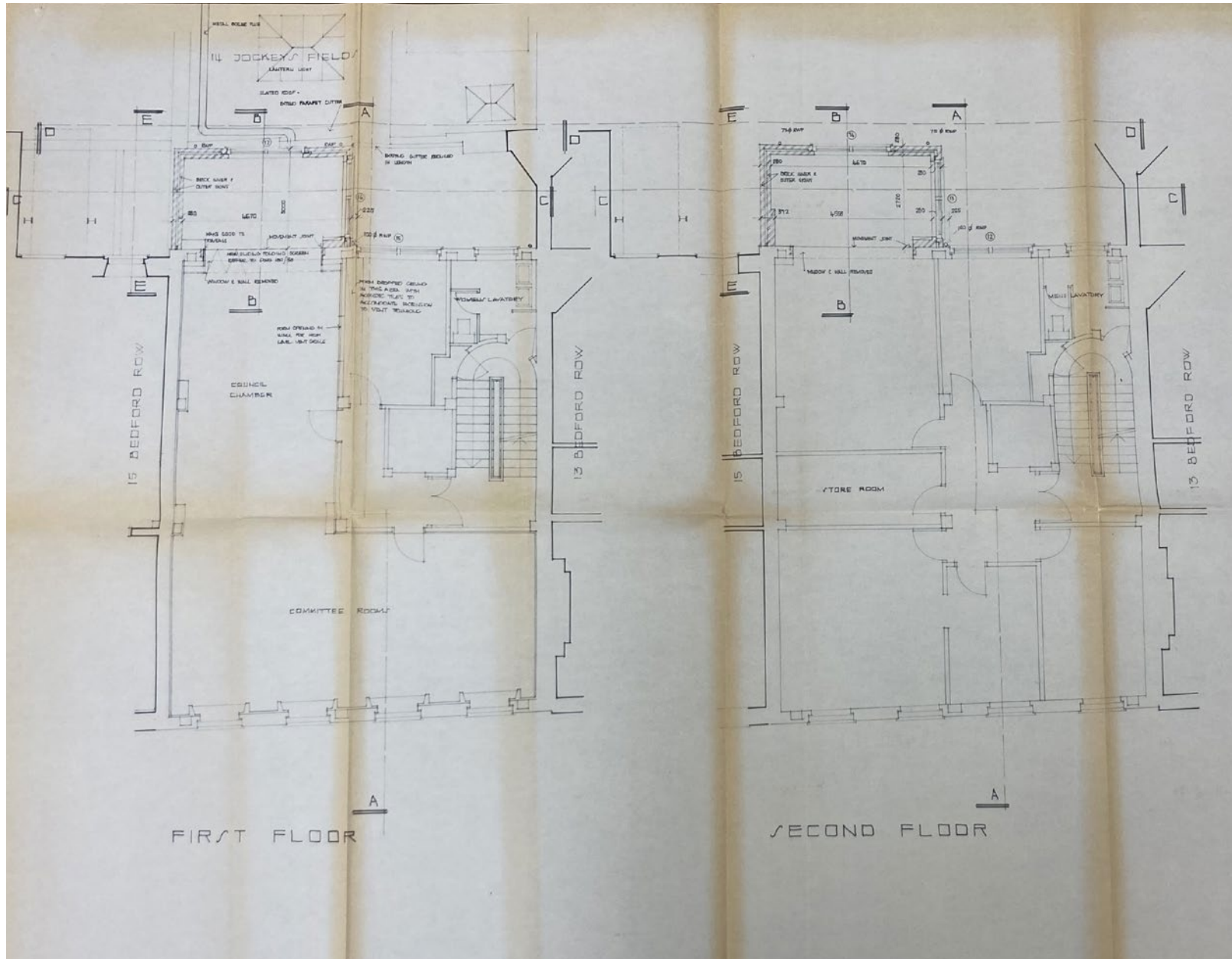
A photograph of the building from 1980 reveals the rebuilt terrace, comprising four storeys, four bays wide, built in brick with a mixture of nine-over-six and six-over-six sashes mimicking the presumed design of the original building on the site **[Plate 2.25]**.

Planning permission was approved for the erection of a fourth floor mansard and part rear extension, ground, first and second floor in 1980. In 1981, planning permission was approved for the erection of a part third floor rear extension to provide additional office floor space. R L Nicholls Architect designed the changes for the Chartered Society of Physiotherapy who occupied the building at that point **[Plates 2.26 – 2.31]**. The plans show that the additional extension to the rear and the new fourth floor within the new mansard comprised a boiler room and open plan office space.

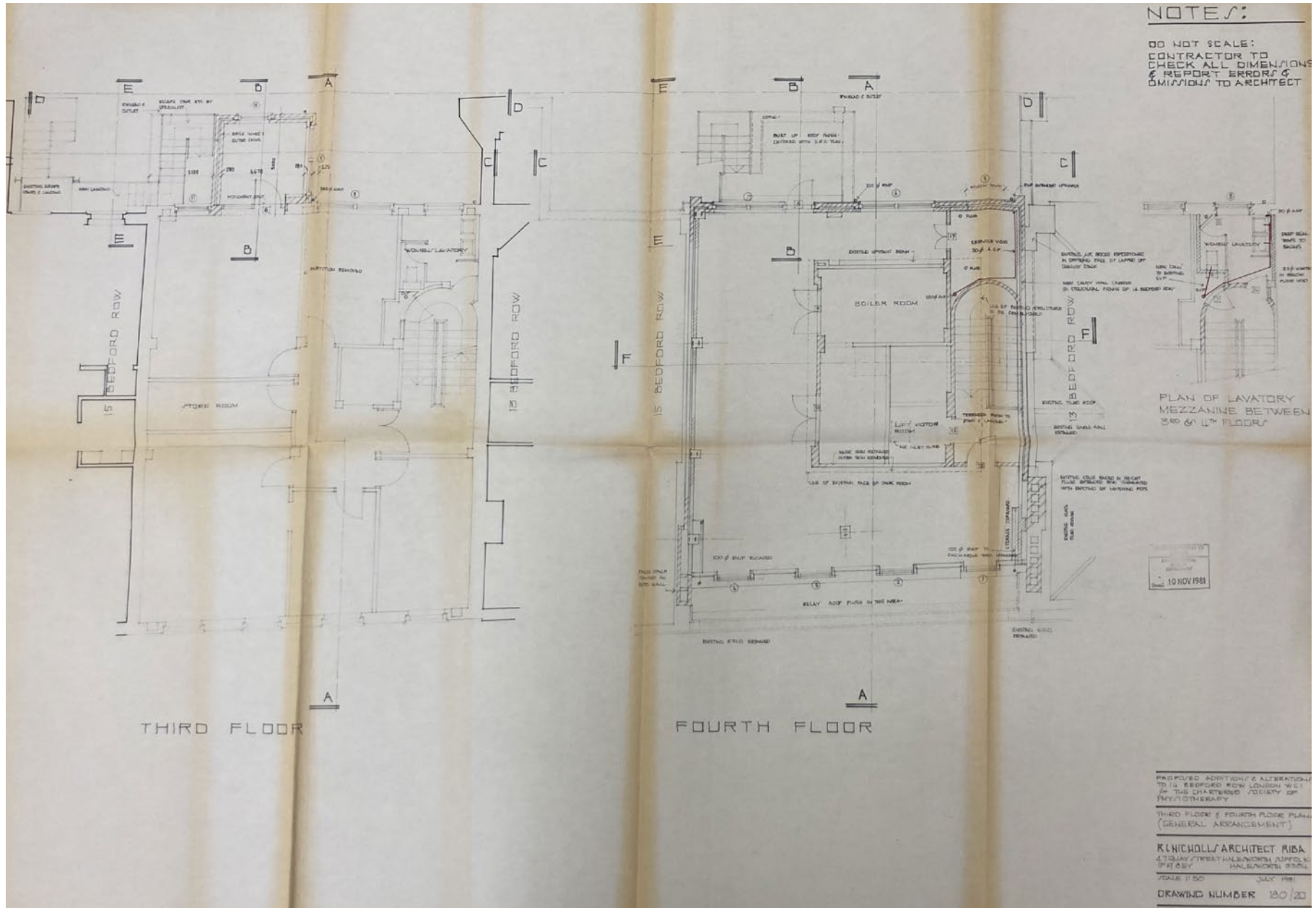
Listed building consent was granted in 1987 to form a new reception and library and in 1990, and a new external escape stair was added to the rear **[Plate 2.32]**.



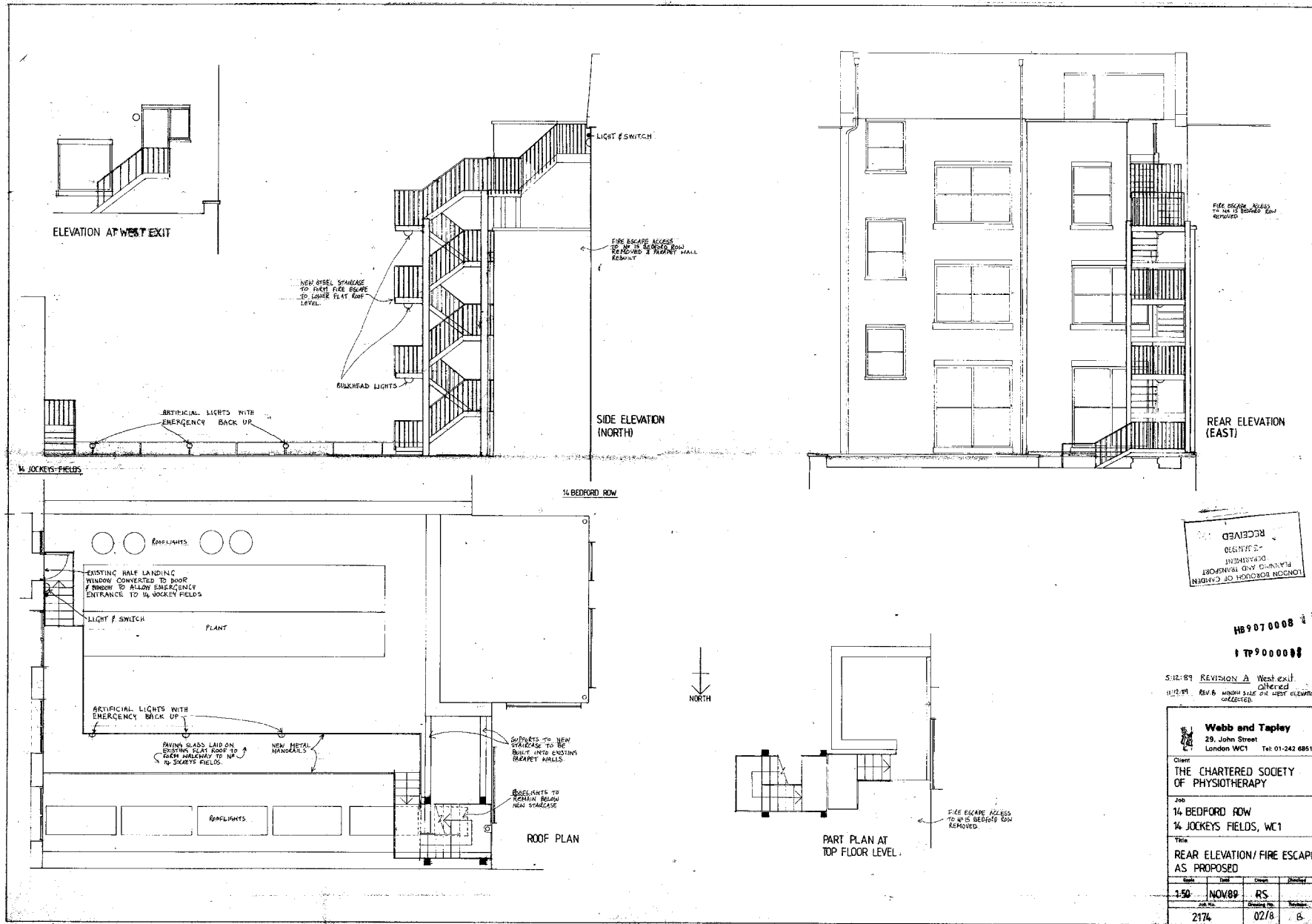
2.25 1980 Photograph (London Picture Archive)



2.27 1981 First and Second Floor Plans (Camden Archives)



2.28 1981 Third and Fourth Floor Plan (Camden Archives)



2.32 1989 Fire Escape (Camden Planning Archives)

2.3 The Mews Building: 14 Jockey's Fields

No. 14 Jockey's Fields is likely to have been originally built as the stables to serve 14 Bedford Row in the early-18th century, but in the 19th century it was in use as commercial premises. The 1885 London Post Office Directory show that Moser & Co basket makers were based at 14 Jockey's Fields. The Goad Insurance Plan from 1887 reveals 14 Jockey's Mews extended into the garden behind 14 Bedford Mews, comprising a building with a slate roof with four skylights, and was then unusually labelled as a club, a different use to the offices at 14 Bedford Row (see plate 2.3). However, when cross-referenced with the 1887 London Post Office Directory, no. 14 was in fact occupied by Luxmoore W & Co, electric lamp makers. In the 1894 OS map the rear mews building continued to have a separate use, labelled as a Drill Hall, indicating a continued separation of uses to 14 Bedford Row which at the time was in use as solicitors and accountants offices (see plate 2.4).

In the 1910 Post Office Directories, John Wardale and Co, makers of barometers, were registered at 14 Jockeys Fields. In 1922, it was proposed to add a crane to the front of 14 Jockey's Fields, when the building became occupied by the St Clement's Press, a print works and editorial offices also based off Clare Market, responsible for printing the Financial Times and in 1907, printed *Votes for Women* for the Women's Social and Political Union.² The building at this date appeared

to have been rebuilt as an A-frame building with central door and gothic arched metal window in a Medieval Revival style **[Plate 2.34]**.

On the London Country Council bomb damage map, the mews is shown in red, denoting 'seriously damage, doubtful if repairable' (see plate 2.9). However, a bird's eye aerial view from 1948 although grainy contradicts this, showing that the pitched roof with two skylights remained intact, suggesting either that the mews building survived or that damage had either been repaired by **[Plate 2.35]**. This is evidence is inconclusive but suggests that there had been little war damage to the mews.

In 1953, 14 Jockey's Fields was rebuilt as the Assembly Hall and London Regional Headquarters and Office for the National Union of Furniture Trade Operatives, to designs by Dunham and Wire Architects **[Plate 2.36]**. The drawings suggest it was a contemporary-styled building, with metal framed windows and planters.

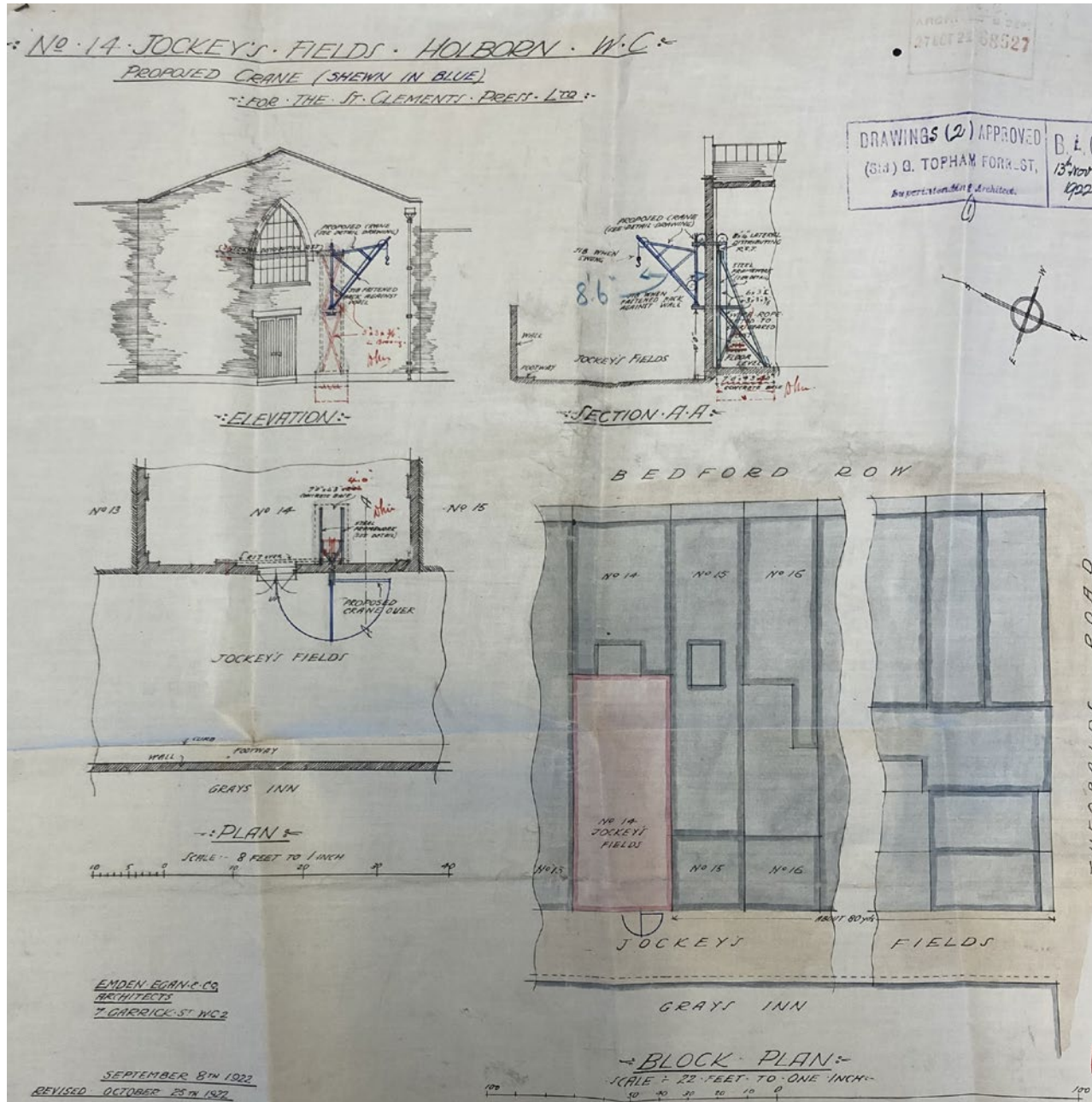
In 1968, planning permission was granted for the erection of two additional storeys above the single-storey rear of the mews for offices at first floor and the formation of a caretakers flat at second floor, as shown in the plans by John D Statham and Partners for the Union of Furniture Trade Operatives **[Plate 2.37]**.

In 1986, 14 Jockey's Fields was rebuilt once again as a three-storey building with a two-storey rear range, replacing the previous buildings, according to planning permission ref. 8601556. The mews and rear block were rebuilt as council chamber offices storage and staff facilities for the Chartered Society of Physiotherapy who also occupied now 14 Bedford Row; unfortunately, no plans accompany the planning application or have been found in the archives. This is the first evidence found of 14 Bedford Row being connected with the mews building which until this date had not been interconnected.

In 2014, a new metal handrail and glazed screen was installed to the flat roof of the rear range of 14 Jockey's Fields.

2 "St Clement's Press", LSE, <https://blogs.lse.ac.uk/lsehistory/2015/07/09/printing-presses-and-science-labs-the-story-of-st-clements/#:~:text=St%20Clement%27s%20>

[Press.-In%201898%20St&text=The%20building%20was%20designed%20by,Union%20based%20in%20Clement%27s%20Inn.](https://blogs.lse.ac.uk/lsehistory/2015/07/09/printing-presses-and-science-labs-the-story-of-st-clements/#:~:text=St%20Clement%27s%20) Accessed 4 December 2023



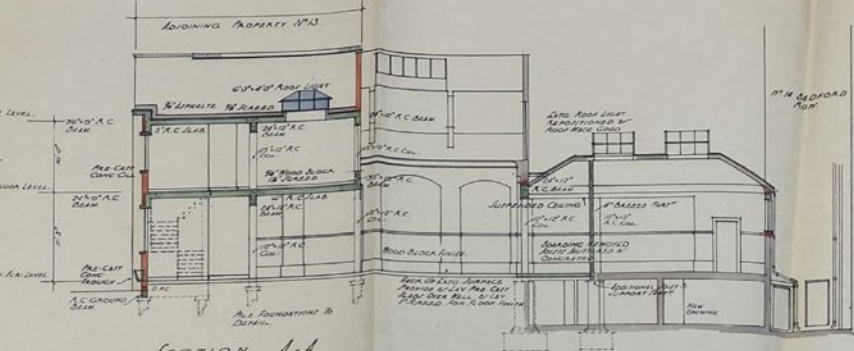
2.35 1948 Aerial Photograph (Historic England, RAF_58_40_VP2_5288)

2.34 1922 14 Jockey's Field Crane (LMA)

REVISIONS	
A	10.10.53
B	1.1.53
C	6.1.53
D	3.2.53



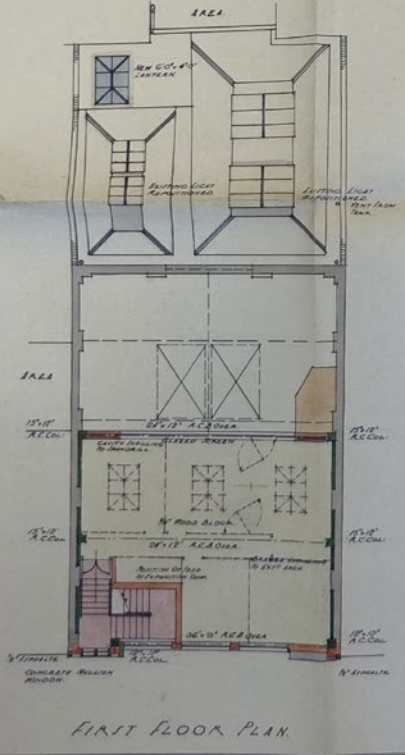
ELEVATION TO JOCKEY'S FIELDS.



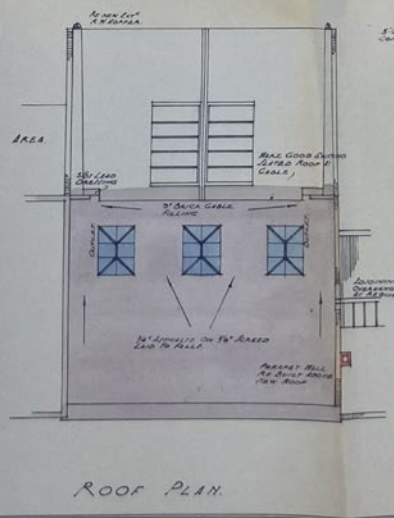
SECTION A-A.



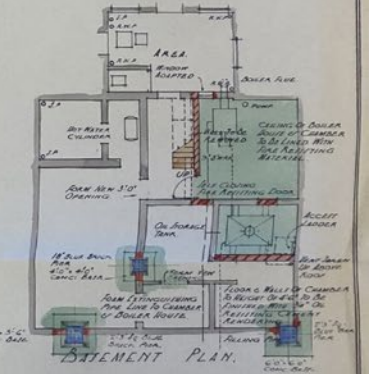
PLAN.



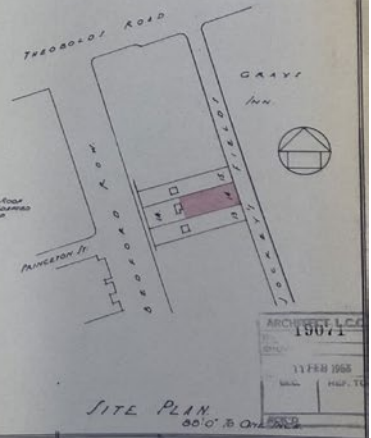
FIRST FLOOR PLAN.



ROOF PLAN.



BASEMENT PLAN.

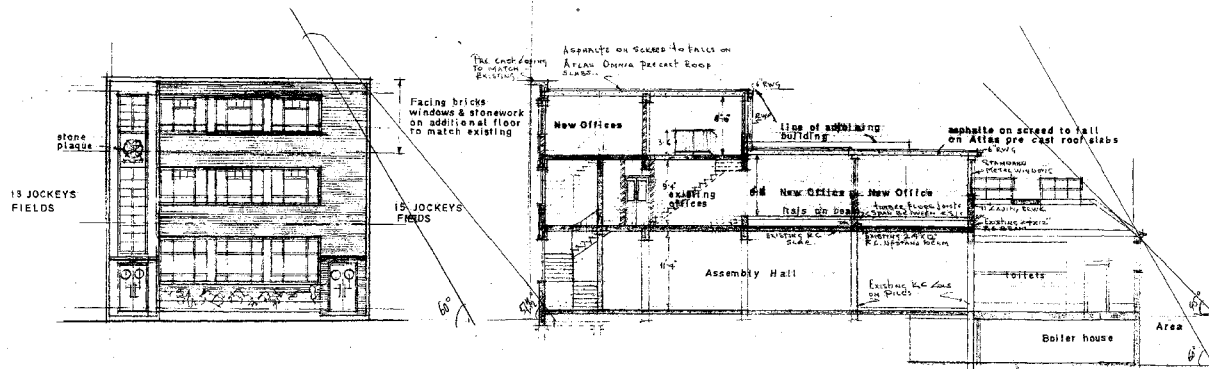


SITE PLAN.

DRAWING N^o DW21/1. PROPOSED ASSEMBLY HALL & LONDON REGIONAL HEADQUARTERS & OFFICE FOR THE NATIONAL UNION FURNITURE TRADE OPERATIVES N^o 14 JOCKEY'S FIELDS LONDON W.C.1. SCALE - EIGHT FEET TO ONE INCH.

DUNN & WHEAT KRICK/LMA/BA
CREATED ARCHITECTS OF LONDON
37 GAY STREET W.C.1.

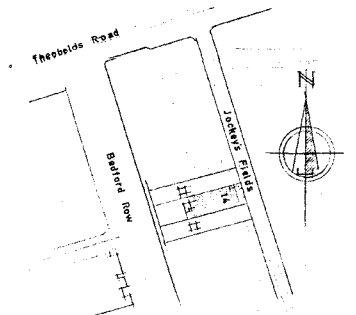
2.36 1953 Redevelopment of 14 Jockey's Fields (LMA)



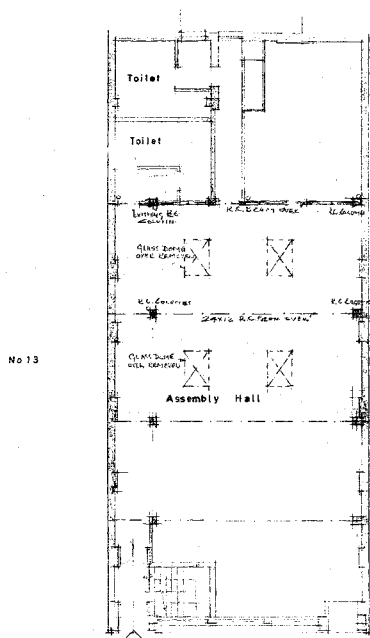
Elevation to Jockeys Fields

Section A.A

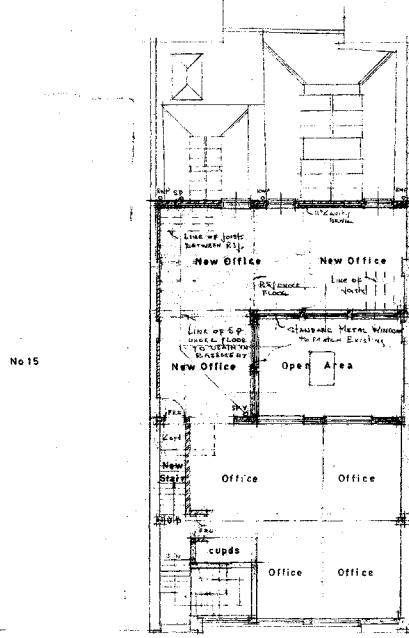
14 Bedford Row under construction



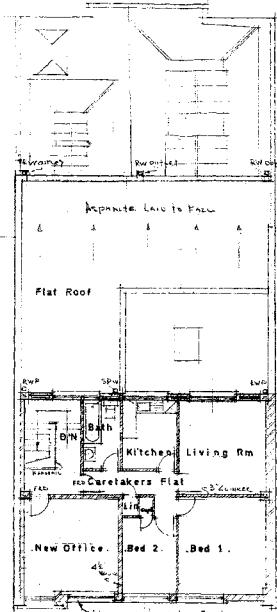
Site Plan; scale 80ft-1inch.



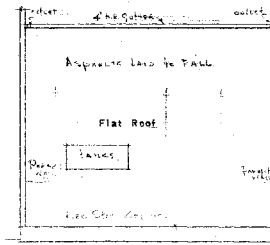
JOCKEYS FIELDS
Ground Floor Plan.



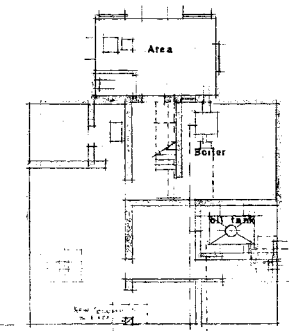
First Floor Plan.



Second Floor Plan.



Roof Plan.



Basement Plan.

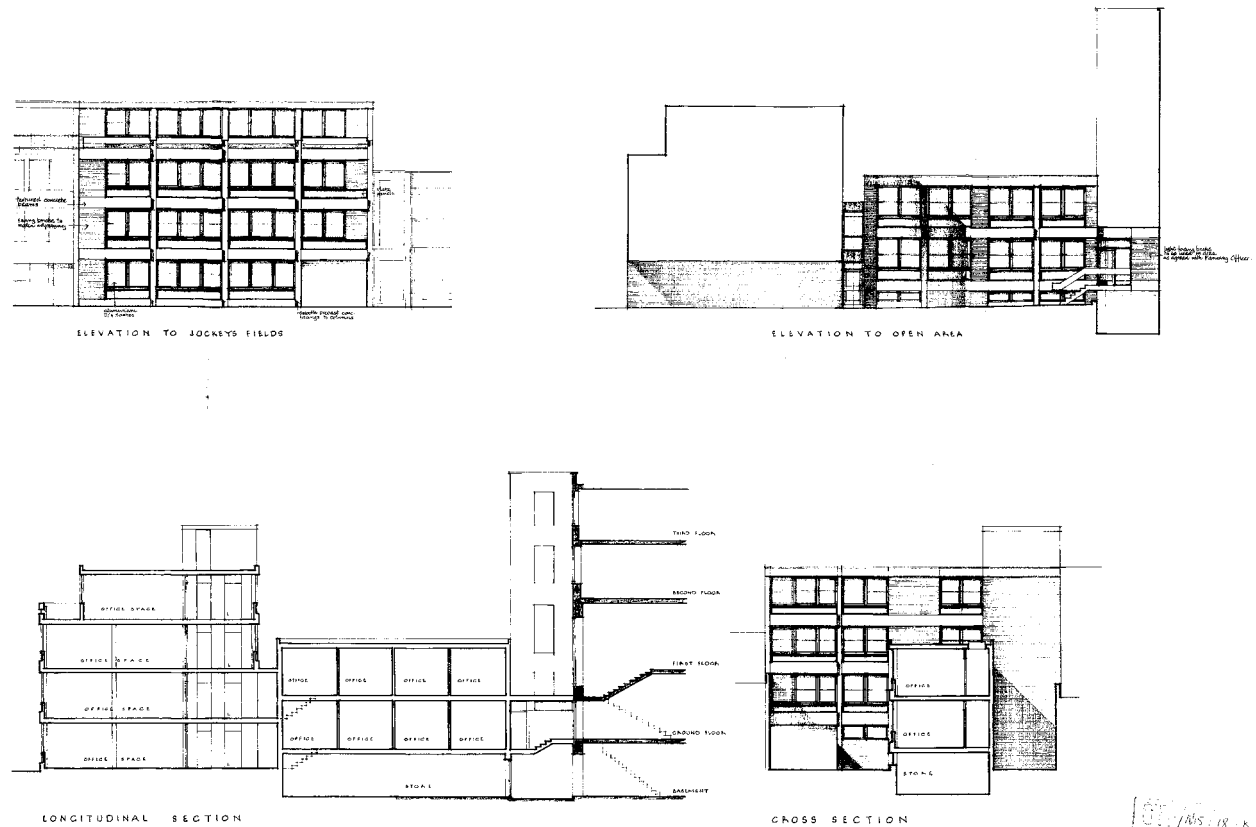
2.4 The Mews Building: 12 – 13 Jockey's Fields

These two plots originally accommodated two stable buildings, associated with the houses at 12 and 13 Bedford Row. The 1887 Goad plan shows that 12 and 13 Jockey's Fields to the south of No. 14 were still used as stables in 1887. They were two storeys high (see plate 2.3). The London County Council bomb damage map suggests that there was no damage to these buildings following the Second World War.

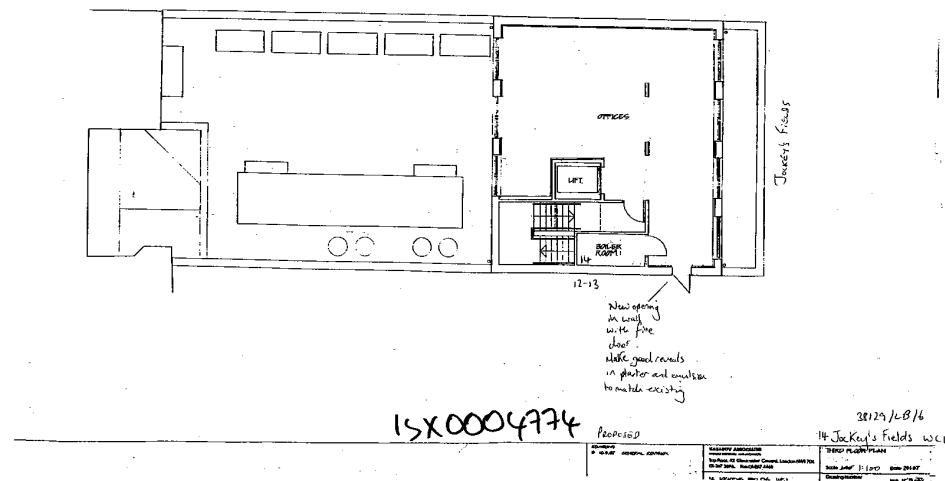
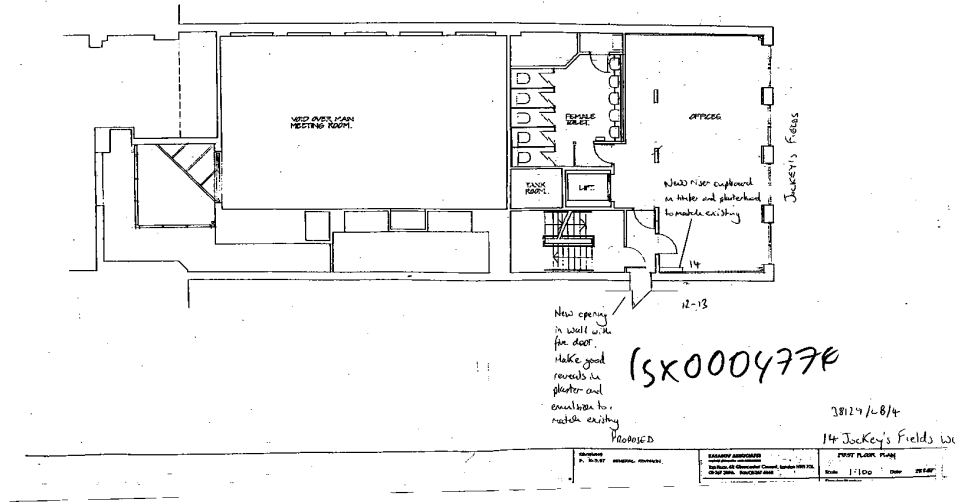
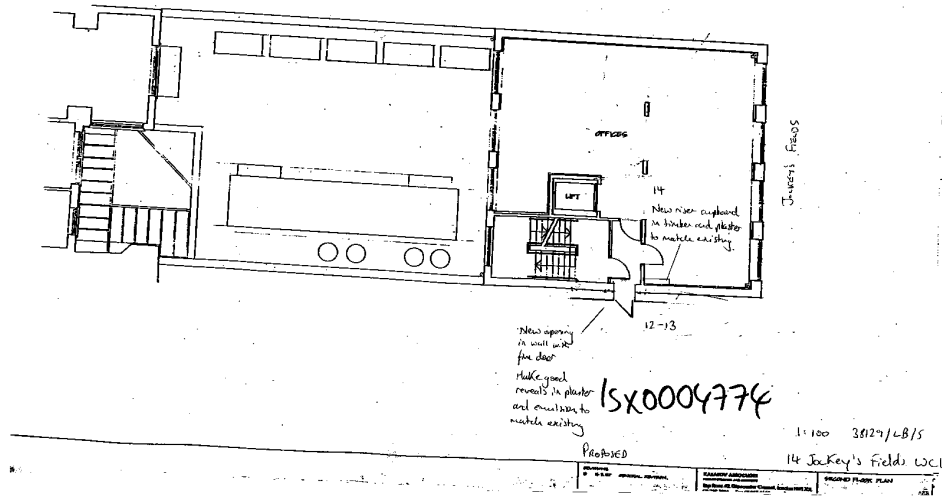
In 1969, 12 – 13 Jockey's Fields were rebuilt as a four-storey modern office building for solicitors, Simmonds, Church Rackham and Company to the designs of Burrough & Hannam [Plate 2.38].

The two buildings at Nos. 12 – 13 and 14 Jockey's Fields were not connected to each other until 2000 for the Chartered Society of Physiotherapy, occupant of 14 Bedford Row and 14 Jockey's Fields when internal openings were formed at first, second and third floor levels to form contiguous offices [Plate 2.39].

An aerial photograph from 2015 shows the front elevations of 12 – 13 and 14 Jockey's Fields, with plant to the flat roofs; it also reveals the fire escape staircase and modern rear of 14 Bedford Row [Plate 2.40]



2.38 1969 Rebuilding of 12 - 13 Jockey's Fields (Camden Planning Archives)



2.39 2000 Proposed Plans (Camden Planning Portal)



2.40 2015 Aerial Photograph (Historic England, 29226_009)

2.5 Architect Biographies

2.5.1 C.H. Elsom and Partners

C.H. Elsom and Partners designed the rebuild of 14 Bedford Row in 1967. Cecil Harry Elsom (1912 – 2006) started his practice at just aged 21 when in 1933 he won an architectural competition for a town hall in Welwyn Garden City and three years later, he established the partnership of Lyons, Israel & Elsom.³ He was elected ARIBA in 1939 and FRIBA in 1954. By 1960 Elsom formed the practise, C. H. Elsom & Partners. This became Elsom, Pack & Roberts in London in 1980s, with Wiliam Pack and Alan Roberts. The practice were based in London, with a branch office in Edinburgh.⁴

Throughout Elsom’s career, as well as 14 Bedford Row, he designed various buildings in the 18th century style, such as Schomberg House in Pall Mall and at York Gate, Regent’s Park. In 1957 – 9, Eastbourne Terrace in Paddington was entirely rebuilt by Elsom.⁵ Yet, Elsom also designed buildings in a modern style, including several office buildings in London such as 2-4 and 13 – 17 Fitzroy Street and 80 – 84 Tottenham

Court Road.⁶ He designed Dorset Square offices in 1964, on the corner of the square, where one side is a facsimile of the original Georgian building and the other is a modern design. Elsom was responsible for the redevelopment of the south side of Victoria Street in 1977.⁷

C. H. Elsom and Partners designed London Television Centre, 60 – 72 Upper Ground in 1974, of which a COI was issued for in August 2023.

2.5.2 Burrough and Hannam

Burrough and Hannam designed the rebuild of 12 – 13 Jockey’s Fields in 1969. They were also architects of several buildings in and around Bristol including St Andrew’s Church Bristol; the church of Christ the King and St Peter, Lawrence Weston (now demolished); an industrial bakery building and Gloucestershire Country Cricket Club.⁸ These examples are generally high quality modernist buildings. The practice designed St Chad, an Anglican Methodist Church in 1963 – 64 which is listed in the 20th century society’s C20 Churches list.⁹ The Church of St Mary on Cheney

Manor Road in central Swindon is a Grade II-listed building; it was rebuilt in 1848 and is listed for its 19th century design. Burrough and Hannam added the north chancel extension with glazed concrete honeycomb blocks which is noted in the list description and is of high quality.¹⁰

3 “Cecil Elsom”, The Times, Thursday 27 April 2006, Issue 68685, p. 66.

4 “Cecil Harry Elsom”, Scottish Architects, accessed 4 December 2023, https://www.scottisharchitects.org.uk/architect_full.php?id=404229

5 T F T Baker, Diane K Bolton and Patricia E C Croot, ‘Paddington: Bayswater’, in *A History of the County of Middlesex: Volume 9, Hampstead, Paddington*, ed. C R Elrington (London, 1989), pp. 204-212. *British History Online* <http://www.british-history.ac.uk/vch/middx/vol9/pp204-212> [accessed 4 December 2023].

6 “Office Building, Cartwright Estate, Fitzrovia, London”, RIBAPix, accessed 4 December 2023, <https://www.ribapix.com/Office-building-Cartwright-Estate-Fitzrovia-London-RIBA40377> and “Office Building, Bruton Street, London”, RIBAPix, accessed 4 December 2023, https://www.ribapix.com/office-building-bruton-street-london_riba122066

7 “Cecil Elsom”, The Times, Thursday 27 April 2006, Issue 68685, p. 66.

8 The Architects Journal, 1947 and 1960 and Heritage Gateway

9 “St Chad”, Twentieth Century Society, [St Chad – The Twentieth Century Society \(c20society.org.uk\)](https://www.c20society.org.uk/st-chad), accessed 4 December 2023

10 “Church of St Mary”, Historic England, <https://historicengland.org.uk/listing/the-list/list-entry/1198311?section=official-list-entry>, accessed 2 December 2023.

2.6 Relevant Planning History

2014/4323/L Approved 2014

Alterations to acoustic screen on rear flat roof (as amendment to Listed Building Consent 2013/1262/L).

2013/7944/P and 2013/7819/L Approved 2013

Addition of mullion to windows, and alterations to rooflight approved under planning permission 2013/1179/P.

2013/1179/P and 2013/1562/L Approved 2013

External alterations to include the replacement of existing windows, roof covering, and acoustic screen, installation of new handrails and repositioning of existing handrail to Jockey's Field block and Bedford Row office buildings (Class B1).

2013/3111/P Approved 2013

Alterations to third floor and roof to the rear for: replacement of the existing covering to the flat roof, raising of a section of the parapet and relocation of the safety handrails along the northeast and southwest elevations, Installation of photovoltaic panels on the flat roof and the replacement of the existing single / double glazed windows all associated with the use as Offices (Class B1).

PSX0204490 and LSX0204491 Approved 2002

The installation of 2 No. chillers at rear roof top level, as shown on drawing number: 42637/04 Rev A, 42637/05/SEC, 42637/06/SEC and Acoustic Report 013821.

PSX0204186 and LSX0204187 Approved 2002

The installation of a chiller unit on the third floor roof of 14 Jockeys Fields and a galvanised safety rail around the perimeter of the roof. As shown on drawing

numbers 42637/01; 42637- ELE; 42637/02; /03; details of air-to-water heat pumps; details of dimensions; details of noise survey; photos

PSX0204188 and LSX0204189 Approved 2002

The installation of safety railings at roof level, as shown on drawing numbers; 42637/01; 42637/02; 42637/03.

LSX0004774 Approved 2000

Creation of internal openings at first, second and third floor levels, as shown by drawing numbers 38129/LB/1, 38129/LB/2, 38129/LB/3, 38129/LB/4, 38129/LB/5, 38129/LB/6, location plan and photograph.

900011 and 9070008 Approved 1990

The erection of a rear escape staircase as shown on drawing numbers 2174 02/B-B & 2174-01

8703637 Approved 1987

Approval of details of facing materials and disabled access.

8670306 Approved 1986

Works of alteration to form a new reception and library as partly illustrated in drawing numbers 159/EX1 & EX2 and 159/01-06.

8601566 Approved 1986

The erection of a basement ground and three-storey building on Jockey's Fields behind which is a two-storey building linking through to 14 Bedford Row WC1 all to be used as meeting rooms Council chamber offices storage and staff facilities for the Chartered Society of Physiotherapy as illustrated in drawing numbers 159/EX1 & EX2 and 159/01-06

HB2666 and 32314 Conditional Permission 1981

The erection of a part third floor rear extension to provide additional office floor space.

HB2458R and 30823R Conditional Permission 1980

Erection of a fourth floor mansard roof addition together with a part rear extension at basement, ground, 1st and 2nd floors, for office purposes.

30290 Approved 1980

The rebuilding of the premises and the additional of a 4th floor for use as offices.

6290 Conditional Permission 1968

The erection of additional offices on the first floor and the formation of a new second floor comprising offices mxl caretaker's flat at No. 14 Jockeys Fields

N15/18/Q/3275 Approved 1967

The above premises in pursuance of Condition 1 of the planning permission granted on 10th January, 1964.

1708 Approved 1966

The Use of 14, Bedford Row, Camden, as offices for the Chartered Society of Physiotherapy.

N15/18/Q/1583 Registered 1963

The rebuilding of the premises and the addition of a fourth floor at No.14 Bedford Row, Holborn, for use as offices.

16171 Approved 1952

The carrying out of alterations to No.14, Jockeys Fields, Holborn, and its use as an assembly hall and offices.

2.7 Sources and Bibliography

Ancestry

London Post Office Directories

London Metropolitan Archives

GLC/AR/BR/06/050394

Camden Local Studies and Archive Centre

All files relating to 14 Bedford Row and 14 Jockey's Fields

Camden Planning Archives

All files relating to 14 Bedford Row, 14 Jockey's Field and 12 – 13 Jockey's Fields

Historic England

RAF Aerial Photograph Collection

Websites

Layers of London

Locating London

London School of Economics

London Picture Archive

National Library of Scotland

RIBAPix

Romantic London

Scottish Architects

Twentieth Century Society

UKMOHO

RIBA Library

The Architects Journal

Published Sources

Baker, TFT. Diane K Bolton and Patricia E C Croot, 'Paddington: Bayswater', in *A History of the County of Middlesex: Volume 9, Hampstead, Paddington*, ed. C R Elrington (London, 1989), pp. 204-212. British History Online <http://www.british-history.ac.uk/vch/middx/vol9/pp204-212> [accessed 4 December 2023].

"Cecil Elsom", *The Times*, Thursday 27 April 2006, Issue 68685, p. 66

Summerson, John. *Georgian London*. New Haven and London: Yale University Press, 2003.

Walford, Edward. 'Red Lion Square and neighbourhood', in *Old and New London: Volume 4* (London, 1878), pp. 545-553. British History Online <http://www.british-history.ac.uk/old-new-london/vol4/pp545-553> [accessed 21 November 2023].

Ward, Laurence. *The London County Council Bomb Damage Maps: 1939- 1945*. London: Thames & Hudson, 2015.

Historic England, *Listed Buildings and Curtilage: Advice Note 10*, Published February 2018

3.0 Site Survey Descriptions

3.1 The Setting of the Buildings and the Conservation Area

3.1.1 Setting of Bedford Row

Bedford Row is a broad, tree-lined street of early Georgian terraced housing and some later sympathetic replacement buildings. Its overall appearance is of consistent, four-storey terraces with aligned windows, roofs concealed behind a consistent parapet wall, and basement floors set back from the pavement behind light wells. However closer inspection reveals a jumble of rebuilding and adaptation within the frame of Nicholas Barbon and Robert Burford's original designs. Most retain a continuous platband above the ground floor windows and a feature doorcase with fanlight, although the styles of these vary considerably. Brickwork of varying colours dates from the eighteenth, nineteenth and twentieth centuries, sash windows are mostly six-over-six, but Number 8 has Victorian two-over-two, while three of its neighbours are four-over-four. Number 20-22 is a twentieth-century eight-bay office building to Georgian designs [Plate 3.1].

14 Bedford Row is located roughly mid-way down the eastern side of the street, obliquely opposite the junction with Princeton Street, making it visible in long views [Plate 3.2]. To its right, Number 13 has a more residential appearance and is attributed in its list description to Robert Burford, 1717-18, as is Number 15 to the left. The broad pavement is laid with concrete slabs, with black metal bicycle racks installed directly in front of Number 15.



3.1 Bedford Row looking north from Number 14



3.2 Numbers 13 and 14 Bedford Row seen from Princeton Street. The mansard floor was added to Number 14 in 1981

3.1.1 Setting of Jockey's Fields

Jockey's Fields is a narrow former mews backing onto the rear of the houses on Bedford Row. Along its eastern side, tall mature trees overhang the high brick wall (Grade II listed) which surrounds Gray's Inn. Behind these is the continuous terrace of the Raymond Buildings (1825; Grade II). Along the western side the buildings are separated from the street by a narrow pavement. They range in style and age, many with a ground floor vehicle access. Towards the southern end is a row of two-storey nineteenth-century industrial buildings, but most are twentieth-century with three storeys visible from the street, although some are taller [Plate 3.3].



3.3 Jockey's Fields looking south

3.2 The Buildings Externally

3.2.1 14 Bedford Row

14 Bedford Row has a good quality, replica-Georgian four-bay terraced facade of four storeys with basement and an attic set behind the parapet wall. It is built of modern, dark red bricks laid in Flemish bond, with lighter red brick dressings to the window opening **[Plate 3.4]**. A raised brick platband runs between the ground and first floors. A stair bridge over the front lightwell leads to the six-panelled front door with square fanlight over. The door hood is a modern copy with carved console brackets copied from Number 17. Square metal downpipes frame the elevation, running down from parapet level close to each party wall.

The modern railings around the lightwell are thin, modern with intermittent vase finials picked out in silver paint. A gate leads to a staircase down to the basement door.

The windows are pull-down sashes with wide exposed frames in the style of the late seventeenth- or early eighteenth-century. They reduce in height further up the building. Those in the basement windows are six-over-six sliding sashes in segmental openings protected by unattractive metal bars.

The rear elevation is not visible from the street and has no historic interest **[Plate 3.5]**. The ground and basement floors are obscured by the rear block of 14 Jockey's Fields which infills the garden. The visible areas are of a similar brick to the front elevation but



3.4 14 Bedford Row, front elevation

expressed in a modern idiom and laid in a stretcher bond. It has three bays, the southern one with small windows on the half-landing level, a main central bay rising to windows in the mansard roof, and a small rear range to the north. The window openings have concrete lintels and sills, the windows are modern, metal-framed, installed in 2013. A metal fire escape stair, installed in 1990, runs down from a small terrace on top of the rear range, cutting across the front of some of the windows.



3.5 14 Bedford Row, rear elevation and roof of link building

3.2.2 14 Jockey's Fields

14 Jockey's field is a modern building in a post-modern Classical style, built in 1986. The ground floor presents with channelled stone-like material, and above this the two visible storeys are red brick laid in stretcher bond with recessed windows on the ground and first floor giving the impression of pilasters **[Plate 3.6]**. The fourth floor is set-back from the building line and not visible from street level, but can be seen, along with roof-mounted PV panels in longer views from Grey's Inn **[Plate 3.7]**. The exposed window sills and lintels are in reconstituted stone and the doors in the outer ground floor bays appear to be blue-painted metal. The windows are metal-framed of the same design as those on the rear elevation of 14 Bedford Row.

The rear elevation is not visible from street level. Seen from 14 Bedford Row, it is a similar brick to the front, with exposed lintels over large window openings **[Plate 3.8]**. The southern-most bay has an exit onto a metal fire escape. The rear range extends back to the rear of Bedford Row. Its flank wall is plain brick side elevation laid in stretcher bond with concrete capping stones **[Plate 3.9]**.

The main flat roof is protected by functional metal railings, and hosts a single PV array. The roof of the rear range has plant, some of which is behind metal screens, and a large grey metal water tank.



3.6 14 Jockey's Field, front elevation



3.7 The Jockey's Fields buildings, seen from Gray's Inn (Google)



3.9 Rear range of 14 Jockey's Fields, side elevation



3.8 Rear elevations of Jockey's Fields, 12-13 on right, 14 on left

3.2.3 12-13 Jockey's Fields

12-13 Jockey's Fields is a modernist building, contrasting in style with its neighbours but of a scale in keeping with its mews surroundings **[Plate 3.10]**. Three storeys are visible from the street, separated by thick concrete slabs, with a fourth storey set-back from view behind a terrace. One bay of the ground floor is entirely made of glass bricks. The southern bay has a metal pedestrian entrance which is barred and quite defensive. The northern two bays have metal shutters to vehicle entrances. The upper floors have black brick end-panels and slate tiles underneath the modern windows.

The rear elevation is not visible from street level. It is plain, white-painted with a small projecting block behind 12 Bedford Row. In the rear south corner a yellow brick plant enclosure rises to a fifth floor level. The flat roof is guarded by plain, functional railings. Two arrays of PV panels are mounted on the roof (see plate 3.8).



3.10 12-13 Jockey's Fields, front elevation

3.3 The Buildings Internally

3.3.1 14 Bedford Row

The interiors of 14 Bedford Row are generic, entirely modern office spaces of no historic significance which were rebuilt in 1967 when the entire building was reconstructed. A modern staircase and small lift are in a service core in the southeast corner. The staircase is polished grey cement with black-tiled nosings. The yellow handrail and glass balustrade are later. In the stair are curved half-landings where the entrance doors to the toilets follow the curve of the stair. The doors are lightweight, and not of good quality [Plate 3.11].

Basement

The basement is configured as two large spaces with suspended ceiling tiles and industrial, fitted carpets. A door in the southeast corner leads out to the front lightwell which has modern white-glazed tiling on the wall underneath the pavement and a modern staircase leading up. Doors provide access to the pavement vaults which were not inspected [Plate 3.12]. To the rear, a door leads out to a small internal courtyard beyond which a corridor leads into the rear range of 14 Jockey's Fields.

Ground Floor

The front door leads to a reception area with plaster ceiling with recessed lighting, plain walls and wooden flooring. The windows on the front elevation are nine-over-six pulldown sashes. A modern reception counter is protected by a glass screen [Plate 3.13]. To the rear, a modern glazed area overlooks the rear lightwell and a glazed corridor leads to the Jockey's Fields building.

First Floor

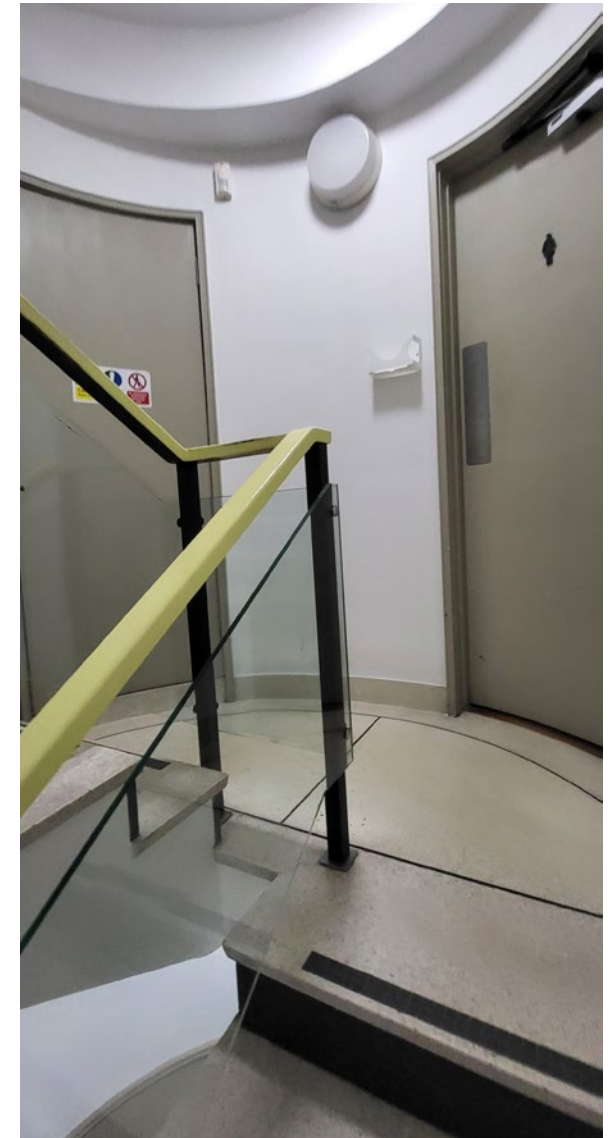
The first floor is divided into larger meeting rooms, which have been upgraded with manufactured wood flooring. The windows on the front elevation are nine-over-six pull down sashes. The suspended ceilings are formed of white tiles with inset lighting panels which cut across the top of the front windows [Plate 3.14].

Second and Third Floors

The second and third floors are subdivided into smaller office spaces, mostly with suspended ceiling tiles, beige-painted walls and industrial carpeting. There are three smaller offices behind the front elevation and a larger space to the rear. The metal fire escape stair cuts across the large modern rear windows [Plate 3.15].

Fourth Floor

The fourth floor has a single open-plan space wrapped around the service core. The windows in the front elevation are three-over-three sashes set into dormers behind the parapet walls [Plate 3.16]. The rest of the space has painted ceilings with strip lighting, beige-painted walls, and industrial carpeting. There are wall-mounted air conditioning units and radiators. The large rear windows incorporate a door leading to a small terrace providing access to the fire escape stair.



3.11 Staircase in 14 Bedford Row



3.12 Front lightwell at 14 Bedford Row



3.13 14 Bedford Row, main reception area



3.14 14 Bedford Row, first floor front room showing suspended ceiling cutting across top of traditionally-styled windows



3.15 Bedford Row third floor interior, overlooking the rear



3.16 14 Bedford Row, dormer windows in the fourth floor front elevation

3.3.2 Jockey's Fields Buildings

The buildings on Jockey's Fields are in a conservation area but unlisted so their interiors are not protected by legislation and not covered in detail here. Their overall appearance is consistent with 14 Bedford Row, namely somewhat dilapidated modern office spaces with institutional lighting, yellow-painted walls and blue, industrial carpeting [Plate 3.17]. The windows date from 2013. A plaque in the in 14 Jockey's Fields commemorates the opening of the building by H.R.H. Princess Alexandra on 27th June 1989, but it is located in an unwelcoming entrance area. On the upper floors, openings in the party walls connect 14 Jockey's Fields with Number 12-13, the difference in floor height requiring three steps down, next to which platform lifts have been installed. The staircase in Number 14 has a generic, institutional character with concrete treads and bright yellow handrails mounted on white-painted walls, the one in 12-13 is slightly better, with an open well and nicely curving metal banister [Plate 3.18].

A corridor through the rear range of 14 Jockey's Fields connects to the rear of 14 Bedford Row at basement and ground floor level [Plate 3.19]. The lower level is mostly a recreation room, shower facilities and plant area with exposed concrete ceilings and service ducts [Plate 3.20]. The upper level has a large meeting room with a high ceiling and walls lined with what appear to be acoustic panels. A small window faces west towards the rear of the Bedford Row building [Plate 3.21]. Daylight also enters through skylights to the north of the meeting room, and in the ceiling of the corridor.



3.17 12-13 Jockey's Fields, office interior



3.18 Staircase in 12-13 Jockey's Fields



3.19 *Link building lower level corridor*



3.20 *Link building, lower level*



3.21 *Link building, upper level*

4.0 Assessment of Significance

4.1 Introduction

The purpose of this section is to provide an assessment of significance of 14 Bedford Row, 12-13 and 14 Jockey's Fields so that the development proposals are fully informed as to their significance and so that the effect of the proposals on that significance can be evaluated.

This assessment responds to the requirement in Paragraph 195 of the National Planning Policy Framework to 'recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance'. 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 (potential to yield evidence about the past), architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.

Heritage assets which might be affected by the development have been identified with reference to the relevant local and national archives and by a site survey.

4.2 Legal Status of the Buildings

14 Bedford Row was listed at Grade II in 1974, 12-13 and 14 Jockey's Fields are unlisted. All three buildings are in sub-area 10 of the Bloomsbury Conservation Area and in the setting of several

listed buildings. This section considers whether the Jockey's Fields buildings could be considered to have listing protection.

Section 1(5b) of the Planning (Listed Buildings and Conservation Areas) Act 1990 defines a listed building as including "any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948".

The courts have said that there are three key factors to be taken into account in assessing whether a structure is within the curtilage of a listed building:

- The physical layout of the listed building and the structure;
- Their ownership, both historically and at the date of listing;
- The use or function of the relevant buildings, again both historically and at the date of listing.

4.2.1 14 Jockey's Fields

The Townscape Appraisal map for the Bloomsbury Conservation Area marks 14 Jockey's Field as a listed building. Research for this report has found this to be incorrect.

Historically 14 Jockey's Fields is likely to have been a mews for the house on Bedford Row. In 1882 the neighbouring buildings on Jockey's Fields were described as 'Stables', but Number 14 had been extended as far as the rear walls of the closet wings on 14 Bedford Row and was described as a 'Club' (see plate 2.3), showing a separation of purpose between

the two buildings. The ownership at this point is unclear. The 1894 OS map shows a clear division between 14 Bedford Row and 14 Jockey's Fields which is described as a "Drill Hall" (see plate 2.4). The site plan for the 1953 rebuilding of 14 Jockey's Field makes clear that it is treated as a separate site, and the floorplans show that there is no connection between the two buildings (see plate 2.17).

14 Jockey's Fields was rebuilt in 1986, twelve years after 14 Bedford Row was listed. There is no record of a listed building consent application for the demolition and rebuilding. The 1986 rebuilding appears to have introduced the connection between the two buildings for the first time since at least the nineteenth century. The entry for 14 Bedford Row on the National Heritage List for England makes no reference to the rear building.

The evidence presented above shows that 14 Jockey's Fields has a long history of being physically separated from the listed building, and having an independent use and function from the listed building from 1882 to 1986. Its historic ownership is still unclear. However these factors, and its construction date after 1948 and after the listed building was listed, indicate strongly that 14 Jockey's Fields should not be considered as a listed building, or as a curtilage structure to the listed building.

4.2.2 12-13 Jockey's Fields

The map of 1887 (see Plate 2.3) shows both 12 and 13 Jockey's Fields as stables, and the houses on Bedford Row as offices. They seem to have survived the war unscathed. In 1951 Numbers 12 and 13 Bedford Row were listed at Grade II*. There is no mention of ancillary

buildings in the detailed list description. Eighteen years later, in 1959, the buildings at 12 and 13 Jockeys fields were demolished and rebuilt in a contemporary style. Given this chronology, the modern building at 12-13 Jockey's Fields cannot be considered as a curtilage structure to the listed buildings at 12-13 Bedford Row.

4.3 Significance of Bloomsbury Conservation Area

The Bloomsbury Conservation Area Appraisal highlights the significance of the area as an early example of town planning. It emphasises the clear hierarchy of streets within a grid layout, and the progression in scale and grandeur from Millman Street through Great James Street to Bedford Row. It references the formal layout of the residential streets of three and four storey brick townhouses, usually of three bays, with rear mews for stabling and occasionally workshops. Important details of the terraced townhouses include vertically-proportioned frontages which adhere to Classical principles, repeated rhythm of windows and door openings, wooden door cases, fanlights, flat-roofed porches, red brick detailing of window openings and metal railings. It also recognises the importance of the perception of homogeneity but also the subtle variation in detailing between buildings.

The Appraisal describes the mews at Jockey's Field as having modest buildings, often with large openings on the ground floor, of two or occasionally three storeys. On Jockey's Fields it observes that the nineteenth-century buildings tend to be of more interest to the conservation area than their twentieth-century

neighbours which it characterises as of lesser quality and of a larger scale, out of keeping with the mews. Neither 12-13 or 14 Jockey's Fields are included in the lists of positive contributors to the conservation area, nor are they identified as detracting. The view south along Great James Street & Bedford Row, terminated by the houses at the end of Bedford Row and the view along Bedford Row with the visual effect of its gradual widening are highlighting as significant.

4.4 Significance of 14 Bedford Row

14 Bedford Row was designed in 1967 by C. H. Elsom & Partners as offices for the Chartered Society of Physiotherapy. Its primary significance is in its front elevation, which the list description describes as having been "rebuilt in facsimile" of a Georgian building. Photographic records show that it was not a direct copy of the previous building as the location of the front door was moved and later accretions of ornamentation were removed from the front elevation. In doing so, historically accurate details were adopted from neighbouring properties, including the brick treatment of the window openings and the early eighteenth-century style of the window framing. The use of nine-over-six glazing on the ground and first floors is an unusual introduction but appropriate for the character of the building and the area. The details of the doorcase were copied from Number 17. Overall, this elevation makes a positive contribution to the character of the building and the conservation area and is the only element of the building that could be said to hold special interest.

In the 1960s rebuilding no effort was taken to accurately re-create the rear elevation. In contrast to its neighbours it is built of the same brick as the front elevation, laid in stretcher bond, with large window openings with concrete dressings. The replacement windows and modern fire escape detract further from its appearance. It is of neutral/detracting significance to both the listed building and the character and appearance of the conservation area.

Archive documentation and photographs record that marble fireplaces and a grand staircase survived the war damage to 14 Bedford Row, but these were not included in the rebuilt interiors. Instead, modern materials are used to create an entirely modern office space with modern plan form which can at best be describes as of neutral significance to the listed building. This leaves the only significance of 14 Bedford Row as its front elevation and the contribution that it makes to the character and appearance of the conservation area and to the setting of nearby listed buildings. Factors which contribute to an external institutional appearance such as window treatments and strip lighting detract from the significance of Number 14.

4.5 Significance of 12-13 Jockey's Fields

12-13 Jockey's Fields was built in 1969 to designs on Burrough & Hannam in place of two mews buildings. It is a modernist interpretation of a mews building, with wide openings retained on the ground floor, and upper floors of concrete, brick and slate divided into four modest-sized bays. The set-back third floor retains the scale of the mews. The original design is of

reasonable quality, but the appearance of the ground floor doorway and garage entries detract from its appearance. Overall, it makes a neutral contribution to the character and appearance of the conservation area. The replacement windows, defensive front door and overall neglected appearance are detracting features. The rear elevation is unattractive, and although only visible from surrounding buildings could be said to detract from the significance of the conservation area. The interiors are of no significance.

4.6 Significance of 14 Jockey's Fields

14 Jockey's Fields was built in 1986 by an unknown architect in an unassuming Classical style. The ground floor and window dressings are of a stone-like material, the upper floors are brick laid in a stretcher bond. As with the neighbouring 12-13 the third floor is set back to retain the scale of the mews. Its materials and scale are appropriate for the character of the conservation area, but the lack of quality and imagination in its design make a neutral contribution. The interiors are of no significance, although the plaque commemorating its opening is of local interest.

This special interest of the buildings has the following hierarchy of significance.

Of the **highest significance** is / are:

- The front elevation of 14 Bedford Row and its railings, though they are post-war replicas;

Of **significance** is / are:

- The scale of the front elevations of the buildings on Jockey's Fields but not their design or fabric;

Of **neutral significance**, neither contributing to or detracting from the significance of the whole is / are:

- The building fabric of 14 Bedford Row;
- The office interiors of all three buildings;

Factors which detract from the significance are:

- The rear elevation of 14 Bedford Row, particularly the replacement windows and external fire escape;
- The rear elevations of the Jockey's Fields buildings;
- Plant equipment on the roof of the rear range of 14 Jockey's Fields;
- The dilapidated appearance of the front elevations of the Jockey's Fields buildings;
- Details seen from the street which reveal the institutional use of 14 Bedford Row.

5.0 Commentary on the Proposals

5.1 Description of the Proposals and their Impact on the Listed Building and Conservation Area

The proposals for 14 Bedford Row and 12-13 and 14 Jockey's Fields are outlined in the drawings and Design and Access Statement by White Red Architects. The proposals aim to bring back into use a site that has been unoccupied for many years. To do this, the buildings will be converted from their original office function into an apart-hotel.

The proposals are described in detail below, their heritage impact is set out in italics. Changes to 14 Bedford Row are assessed in terms of their impact on the architectural and artistic interest of the listed building, the character and appearance of the Bloomsbury Conservation Area and, where relevant, the setting of nearby listed buildings. Changes to the Jockey's Fields buildings are considered in terms of their impact on the character and appearance of the conservation area, and on the setting of the nearby listed buildings.

5.1.1 Changes to 14 Bedford Row (Grade II Listed)

The only physical change to the exterior of 14 Bedford Row is the removal of modern flues from the top of the modern roof. These are not visible from street level. One of the aims of the project is to introduce a domestic feel to the buildings. This will be reflected on the exterior with more appropriate window dressings and softer lighting.

At the rear, the newly-exposed base of the 1980s closet wing will be finished in brick to match the rest of the existing elevation.

Most of the interior will be removed, including partition walls but the floor structures and stair core will remain. The existing office layout will be replaced by a rational arrangement of bedrooms including en-suite bathrooms and kitchenette facilities, and circulation and amenity space. Floor levels will remain the same, and the new partition walls will respect the existing locations of windows. Services and ventilation will be routed to existing vents in the roof, or to the Jockey's Fields side of the buildings so as not to impact the front elevation.

The flues on the roof are not currently visible from street level. Their removal will have a neutral impact on the significance of the listed building and the conservation area. The comprehensive removal of an interior from a listed building is an unusual proposition, but as discussed above, the interiors of this building are entirely modern and not of architectural or historic interest. Their removal will not

cause any harm to the interest of the listed building and was supported in principle by Officers during pre-application discussions.

The introduction of a domestic character to the building will bring a modest heritage benefit.

5.1.2 Changes to 12-13 and 14 Jockey's Fields (Unlisted)

Changes to external elevations of 12-13 and 14 Jockey's Fields include:

- Replacement of industrial-style doors to Numbers 12 and 14;
- Removal/relocation of visible solar panels on the roof;
- Erection of plant enclosures on roof, set back so as not to be visible from street level;
- Insertion of two new windows in the blank-faced brick element to the rear of the southern elevation of Number 12, designed to match the existing window lower down on this elevation.

The existing doors on Jockey's Fields detract from the appearance of the conservation area. The replacement of the doors will, subject to final design details, be a modest improvement. The edges of the roof-mounted solar panels are visible from street level. Their relocation will also bring a modest benefit to the appearance of the conservation area. The new plant enclosures will not be visible from street level, so will have a neutral impact on the conservation area. The enclosures will be shielded from views from the rear of 15 and 16 Bedford Row (Grade II listed) by the height of depth of 15-17 Jockey's Fields, so their setting will*

not be impacted. They will be visible in oblique views from the rears of some of the buildings to the south of 14 Bedford Row which are Grade II* listed, but not to a degree that will be harmful to their setting. The rear elevation of Number 12 is only visible from the rear rooms in the listed buildings on Bedford Row. The insertion of new windows will break up the existing large blank wall which may bring some aesthetic benefits, but with an overall neutral impact on the setting of the listed buildings.

External changes to the rear range of 14 Jockey's Fields include:

- Significantly reducing the scale of the plant enclosures, consolidating equipment behind an enclosure;
- Conversion of the roof into a patio/garden amenity for people staying in the building;
- Removing the roof of a section of the rear range in order to create a lightwell and internal garden area;
- The in-filling of the small lightwell at the junction with 14 Bedford Row.

The rear elevation of 14 Bedford Row is listed as a detracting feature; the plant equipment on the rear range of 14 Jockey's Fields detracts further from its interest. Removing a section of the roof and creating an attractive amenity area will enhance the setting of the listed buildings.

The historic boundary between 14 Bedford Row and the rear range of 14 Jockey's Fields is in line with the rear of the Bedford Row closet wing, added in 1981 (see plates 2.4 and 2.5), although the original Georgian

building had two closet wings, separated by a lightwell. This boundary is currently indistinct internally. At basement level there is a small lightwell adjacent to the closet wing. At ground floor level, this has been over-built by a corridor connecting to the rear range of 14 Jockey's Fields. The lightwell is inadequate to bring sufficient light into the basement level. The proposal would infill the lightwell at basement level, using the new internal garden to bring light to the basement. At ground floor level the line of the existing corridor would be maintained, but the adjacent void would be in-filled. At first-floor level and above, the rear profile of 14 Bedford Row would be clear. Given the lack of significance of the rear elevation, the modern nature of the fabric and layouts and the inadequacy of the current lightwell arrangement, this further blurring of the boundary between the listed building and the modern building behind is not considered to cause harm to the significance of the listed building.

Internal changes to the Jockey's Fields buildings include:

- Partitioning of office spaces to form bedrooms and en-suites, with new partition walls following the existing bay structure on the street-facing elevations;
- Reconfiguration of plant equipment, refuse and cycle storage.

These internal changes to the unlisted buildings will not impact the character and appearance of the conservation area, or cause harm to the setting of the nearby listed buildings.

5.1.3 Impact of Change of Use on Conservation Area

During the pre-application meetings, Officers raised the question of whether the change of use from offices to an apart-hotel and the associated change in servicing would have any impact on the character of the conservation area. The full details of the proposed servicing arrangements are in the Delivery and Servicing Management Plan provided by Motion which accompanies this application. In summary, the majority of servicing (including all refuse collection) will take place from Jockey's Fields. There will be no catering facilities requiring regular deliveries, and laundry will be handled on-site. This is not expected to lead to a significant increase in deliveries/collections from the time when the building was in office use, and not to a degree that will cause harm to the character of the conservation area.

5.2 Justification of the Proposals and Conclusion

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the site comprises the Camden Local Plan (June 2017) and The London Plan (March 2021). Decision-makers must also comply with the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990. This section therefore assesses the proposed development first against the Camden Local Plan, the policies of the London Plan, and finally brings to bear heritage policies in the NPPF and the requirements of the 1990 Planning Act.

The relevant London Borough of Camden policies include Policy 7.41 which states that the Council expects development to not only conserve but to take opportunities to enhance the significance of heritage assets and their settings, Policy D2(e) which requires that development in conservation areas will preserve or where possible enhance the character or appearance of the area, Policy D2(j) which states that the Council will resist proposals for changes to a listed building where this would cause harm to the special architectural and historic interest of the building, and Policy D2(k) which resists changes harmful to the setting of heritage assets. The relevant sections in the London Plan (2021) include Policy HC1 Heritage Conservation and Growth which requires

that development proposals affecting heritage assets should conserve their significance by being sympathetic to the assets' significance.

It is considered that the proposals have been carefully designed to fully meet these requirements. The primary heritage consideration was to not impact the significant front elevation of 14 Bedford Row, which has been achieved. The change to the use of the rooms may bring a minor benefit to the character of the conservation area. The major internal changes would not have any impact on heritage significance. The external changes to the Jockey's Fields buildings are designed to avoid causing harm and to provide a moderate benefit to the character and appearance of the Bloomsbury Conservation Area. The setting of nearby listed buildings will not be harmed.

The proposals would sustain the significance of the listed buildings in accordance with paragraph 203 of the National Planning Policy Framework. Moreover, it is considered that the proposed works would preserve the special architectural and historic interest of the listed buildings and the character and appearance of the conservation area, in accordance with the statutory duties set out in Sections 16, 66 and 72(l) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposals would also accord with the policies in the Camden Local Plan outlined above and would bring an empty building back into use, re-purposing it to ensure its beneficial long-term and optimum viable use.

Appendix I - Statutory List Description

NUMBER 14 BEDFORD ROW AND ATTACHED RAILINGS

Grade: II

Date first listed: 14 May 1974

Most recent amendment: 11 January 1999

House, now commercial premises. 1717-18 by Robert Burford, rebuilt in facsimile after wartime bombing. Brown brick. 3 windows wide, 4 storeys, basement and mansarded attic. Wood architraved doorcase with carved panelled soffit to flat hood and fanlight. Sash windows. INTERIOR not inspected. SUBSIDIARY FEATURES: cast-iron railings. Included for group value as part of the exceptional terrace on the east side of Bedford Row.

NUMBERS 8-13 AND ATTACHED RAILINGS. NUMBER 11 INCORPORATING THE FORMER NUMBER 10

Grade: II*

Date first listed: 24 Oct 1951

Most recent amendment: 11 January 1999

6 terraced houses. 1717-18. By Robert Burford, carpenter, on land leased to him and George Devall, plumber, by Margaret Skipwith in 1716. Most with internal alterations of high quality c1820. No.10 (gutted in 1941) rebuilt in replica after Second World War as part of No.11. Brown or yellow stock brick with some refacing of upper storeys and parapets. Tiled mansard roofs at right-angles to street front, those to Nos 10 and 11 slated.

EXTERIOR/PLAN: each house is 2 rooms deep, originally with cross passage between them but in early C19 incorporated into front rooms as buffet alcove; this space filled at upper levels with stair, all with closet wings. Principal stair to rear of entrance extends to first floor only, with rooms over this space at upper levels. Rear extensions over gardens and mews not of interest except where noted. Brick bands at first floor level. No.12 tuck pointed. 4 storeys and basements. 3 windows each, No.11 four windows wide. Gauged red brick arches and dressings to flush frame sash windows. Nos 8-9: wood architraved doorcases with good carved brackets, panelled soffits to flat hoods, patterned fanlights and panelled doors. No.11: C20 wood doorcase with fluted Doric engaged columns carrying entablature and modillion cornice, patterned fanlight and panelled door. Nos 12 and 13 have wood architraved doorcases with good carved brackets, panelled soffits to flat hoods, with patterned fanlights and panelled doors complete with original hinges and bars. Some houses with original lead rainwater heads inscribed 1718.

INTERIORS: No.8 with fully panelled ground floor rooms and box cornices. Entrance hall also fully panelled with Corinthian pilasters forming inner arch. Fine open-string staircase with twisted balusters and decorated tread ends, counterpoised by continuous dado on other side. Upper floors not inspected but noted to be of high quality. No.9 has fully panelled entrance hall with dado rail and box cornices, marble tiled floor. Fluted pilasters with Corinthian pilasters to inner arch. Ground-floor rooms with raised and fielded panelling, with smaller panels over fireplaces, and shutters. Front room with flat arch leading to curved buffet arch.

Early C19 cornice. Ground-floor rear room and closet with full panelling, box cornices and corner fireplaces. Room beyond closet a later C18 addition fully panelled with simple cornice and early C20 fireplace. Grand staircase to first floor with open-string staircase with decorated ends, twisted balusters set three per square; a corresponding panelled dado with small Corinthian pilasters at head, foot and turn of flights; box cornices; shutters to giant staircase window. First floor rooms with early C19 ceilings and fireplaces, the rear room with corner fireplace and closet having early C18 panelling. Between the main rooms closed-string staircase with chunky turned balusters rises to third floor, all save return flight to second floor renewed in 1994. Second floor with simpler ovolo-moulded panelling and dado, rear room with Adamesque fireplace with marble lining and box cornice; closet with corner fireplace and cast-iron grate. Front room partitioned but retains full-height ovolo panelling and dado and fireplace with marble surround. Over principal stair another rear room with ovolo panelling, box cornice and fireplace. Third floor with some panelling and early C20 fireplaces. Attic reached by stick baluster stair. No.10 incorporated as part of No.11 in 1944. It has a fireplace moved from the ground floor of No.11 and now forms part of that address. No.11 is the most impressive house in the row, built on a larger plot for Dame Rebecca Moyer, resident 1720-23. Her initials and the date 1720 on water tanks brought from basement and now in conference room added 1950s in sympathetic style to rear. Pair of closet wings at rear. Magnificent entrance hall and staircase. The staircase with twisted balusters and landing, filling front entrance hall. Hall with corner fireplace, fully panelled and with fine and complete sequence of wall paintings

by John Vanderbank in commemoration of George I, mounted and surrounded by allegorical figures in painted architectural surround, early 1720s. Secondary stair to rear of this at ground floor continues as principal stair from first to third floor, with turned balusters on closed string, corresponding dadoes and panelling. Ground-floor front room with C18 panelling and early C19 cornices, shutters and fireplace. Rear room with early C19 cornices and fireplace brought from third floor. Ground-floor panelled closet wing to rear of stair with corner fireplace. First floor rooms continue this lavish combination of fine raised and fielded panelling with richly moulded early C19 cornices and marble fireplaces. Second floor retains box cornices, ovolo panelling, and fireplaces. Third floor with plain panelling, most complete in rear rooms. Basement wine cellars. Nos 12 and 13 in common ownership with linking doors. No.12 has fully panelled entrance and staircase hall with fluted Corinthian pilasters to inner arch. From ground to first floor a handsome open-string stair with decorative ends and twisted balusters, three per tread, with corresponding dado which has Corinthian pilaster strips at head, foot and turn of flights extending to full height. Ground-floor front room divided by timber Corinthian columns of early C19 to form buffet. Marble fireplace, cornice, shutters with C18 hinges as in staircase hall. Rear room with marble fireplace under dentilled mantelpiece, ovolo-panelled closet. First floor altered early C19 with cornices to both rooms and ceiling rose to front room. Central closed-string stair with turned balusters rises from first floor to attic in central compartment at right-angles to street. Second floor with ovolo panelling to all rooms, and fireplaces in those to rear. Third floor retains panelling and cupboards to rear room; panelling

to front room very simple. No.13 has fully panelled entrance hall, and staircase of identical pattern to those in Nos 8, 9 and 12 but woodgrained and never painted. However, staircase hall has plaster moulded swags and drops between panels, with richly moulded fruit and leaves - rare in a London townhouse of this date. Ground-floor front room divided by marbled timber columns supporting arch to rear buffet, box cornices and full panelling with dado rail. C19 fireplace. Rear room also fully panelled with closet, the latter carefully restored on all floors in 1992. First floor front room with handsome early C19 marble fireplace and cornice. Rear room with C18 panelling and C18 marble fireplace in later Victorian surround. Door to closet treated as continuation of panelling to dado height with upper section treated as window with early C19 glazing bars. Panelled closet with 1820s grate. Closed string staircase rises from first to third floors through centre of house at right-angles to street, panelled and with corresponding dado panelling flanking stair. Second-floor rooms with ovolo panelling, box cornices and cupboard with H-hinges; C19 fireplace to front, C18 fireplace in closet. Third floor retains some simple panelling and matchboarding, with C18 rear corner fireplace at rear. SUBSIDIARY FEATURES: attached cast-iron railings to areas, some with urn or torch flambe finials.

HISTORICAL NOTE: a fascinating and well-preserved group of houses of unusual richness which together form a group of exceptional quality. The painted staircase hall in No.11 is an individual piece of architectural bravura, making for one of the finest early C18 interiors in London. (British Printing Industries Federation: 11 Bedford Row: -1992).

Appendix II - Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72(l) of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

[...] in considering whether to grant listed building consent for any works the local planning authority or 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.

Similarly, section 66 of the above Act states that:

In considering whether to grant permission 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.

Similarly, section 72(l) of the above Act states that:

[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Local Policy

London Borough of Camden Development Policies, 2010

DP25 – Conserving Camden’s heritage

Conservation Areas

In order to maintain the character of Camden’s conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden’s architectural heritage.

Listed Buildings

To preserve or enhance the borough’s listed buildings, the Council will:

- e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
- f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
- g) not permit development that it considers would cause harm to the setting of a listed building.

London Borough of Camden Local Plan, June 2017

Design

7.1 Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. The National Planning Policy Framework establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning.

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;

f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;

g. is inclusive and accessible for all;

h. promotes health;

i. is secure and designed to minimise crime and antisocial behaviour;

j. responds to natural features and preserves gardens and other open space;

k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,

l. incorporates outdoor amenity space;

m. preserves strategic and local views;

n. for housing, provides a high standard of accommodation;

and o. carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Heritage
Camden's heritage

- 7.39 Camden has a rich architectural heritage with many special places and buildings from throughout Camden's history (see "Map 4: Heritage and Archaeological Sites" on page 210). 39 areas, covering much of the borough, are designated as conservation areas, recognising their special architectural or historic interest and their character and appearance. We have prepared conservation area statements, appraisals and management strategies that provide further guidance on the character of these areas. We will take these documents into account as material considerations when we assess applications for planning permission in these areas.
- 7.40 Over 5,600 buildings and structures in Camden are nationally listed for their special historical or architectural interest and 53 of the borough's squares are protected by the London Squares Preservation Act 1931. In addition, 14 open spaces in Camden are on Historic England's Register of Parks and Gardens. The Council also maintains a local list of over 400 non-designated heritage assets. Camden also has a generally well-preserved archaeological heritage, with 13 identified archaeological priority areas, although this can be vulnerable to development and changes in land use.
- 7.41 The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay

special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings.

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

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;

c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and d. the harm or loss is outweighed by the benefit of bringing the site back into use. 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:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including nondesignated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

Enhancing the historic environment

- 7.42 The Council has a proactive approach to conserving heritage assets. In addition to the application of Local Plan policies the Council protects the historic environment through the following areas of work:
- Conservation Area Management Strategies: The Council works with the Conservation Area Advisory Committees to update and support the implementation of the strategies.

- Heritage at Risk: The Council identifies buildings and structures at risk and proactively seeks to conserve and where required put them back into viable use, including identifying sources of funding.
- Local list of undesignated heritage assets: The Council introduced the local list in 2015 and it will be updated annually.
- Guidance: The Council has adopted detailed guidance for the preservation of heritage assets in the supplementary planning document Camden Planning Guidance on design, and Retrofitting Planning Guidance (for sustainability measures in historic buildings). The Council updates planning guidance as required.
- Area based work: Conservation and enhancement of the historic environment is a key objective of area action plans and the Site Allocations. The Fitzrovia Area Action Plan for example sets principles for developing key sites which retain and enhance the setting of listed buildings.

7.43 The Council recognises that development can make a positive contribution to, or better reveal the significance of, heritage assets and will encourage this where appropriate. Responding appropriately to the significance of heritage assets and its setting can greatly enhance development schemes (for example, King's Cross Central)

Designated heritage assets

- 7.44 Designated heritage assets include listed buildings and structures, registered parks and gardens and conservation areas. The Council will apply the policies above and will not

permit harm to a designated heritage asset unless the public benefits of the proposal outweigh the harm. Further guidance on public benefits is set out in National Planning Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20140306). Any harm to or loss of a designated heritage asset will require clear and convincing justification which must be provided by the applicant to the Council. In decision making the Council will take into consideration the scale of the harm and the significance of the asset.

7.45 In accordance with the National Planning Policy Framework the Council will only permit development resulting in substantial harm to or loss to a grade II listed building, park or garden in exceptional circumstances and will only permit development resulting in substantial harm to or loss to a grade I and II* listed building, grade I and II* registered park or garden in wholly exceptional circumstances.

Conservation areas

7.46 In order to preserve or enhance important elements of local character, we need to recognise and understand the factors that create that character. The Council has prepared a series of conservation area statements, appraisals and management plans that assess and analyse the character and appearance of each of our conservation areas and set out how we consider they can be preserved or enhanced. We will take these into account when assessing planning applications for development in conservation areas. We will seek to manage change in a

way that retains the distinctive characters of our conservation areas and will expect new development to contribute positively to this. The Council will therefore only grant planning permission for development in Camden’s conservation areas that preserves or enhances the special character or appearance of the area.

7.47 The character of conservation areas derive from the combination of a number of factors, including scale, density, pattern of development, landscape, topography, open space, materials, architectural detailing and uses. These elements should be identified and responded to in the design of new development. Design and Access Statements should include an assessment of local context and character and set out how the development has been informed by it and responds to it

7.48 Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development which is outside of conservation areas, but visible from within them. This includes high or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.

Use

7.53 Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which

contribute to the character of a conservation area are not displaced by redevelopment. Two uses of particular importance to the character of conservation areas are pubs and local shops, especially when they are in located in historic buildings. The Council will protect these uses as set out in “Policy C4 Public houses” and “Section 9 Town centres and shops”.

Details

7.54 The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the original. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring houses and streets to inform the restoration. The Council will consider the introduction of Article 4 Directions to remove permitted development rights for the removal or alterations of traditional details where the character and appearance of a conservation area is considered to be under threat.

Sustainable design and retrofitting

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

historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed up against the degree to which proposals will change the appearance of the building, taking into consideration the scale of harm to appearance and the significance of the building. Applicants are encouraged to follow the detailed advice in Camden's Retrofitting Planning Guidance, the energy efficiency planning guidance for conservation areas and the Historic England website.

Listed Buildings

- 7.57 Camden's listed buildings and structures provide a rich and unique historic and architectural legacy. They make an important and valued contribution to the appearance of the borough and provide places to live and work in, well known visitor attractions and cherished local landmarks. We have a duty to preserve and maintain these for present and future generations.
- 7.58 The Council has a general presumption in favour of the preservation of listed buildings. Total demolition, substantial demolition and rebuilding behind the façade of a listed building will not normally be considered acceptable. The matters which will be taken into consideration in an application for the total or substantial demolition of a listed building are those set out in the National Planning Policy Framework.

- 7.59 In order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest. Consent is required for any alterations, including some repairs, which would affect the special interest of a listed building.
- 7.60 The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development. While the setting of a listed building may be limited to its immediate surroundings, it can often extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. Applicants will be expected to provide sufficient information about the proposed development and its relationship with its immediate setting, in the form of a design statement.

Access in listed buildings

- 7.61 Where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. The Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution. We will expect design approaches to be fully informed by an audit of conservation constraints and access needs and to have considered all available options. The listed nature of a building does not preclude the development of inclusive design solutions and the Council expects

sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.

Sustainability measures in listed buildings

- 7.62 Proposals that reduce the energy consumption of listed buildings will be welcomed provided that they do not cause harm to the special architectural and historic interest of the building or group. Energy use can be reduced by means that do not harm the fabric or appearance of the building, for instance roof insulation, draught proofing, secondary glazing, more efficient boilers and heating and lighting systems and use of green energy sources. Depending on the form of the building, renewable energy technologies may also be installed, for instance solar water heating and photovoltaics.

Bloomsbury Conservation Area Appraisal and Management Strategy, 2011

- 1.2 Bloomsbury is widely considered to be an internationally significant example of town planning. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment remain a dominant characteristic of the area. Despite Bloomsbury's size and varying ownerships, its expansion northwards from roughly 1660 to 1840 has led to a notable consistency in the street pattern, spatial character and predominant building forms.

- 1.8 The Bloomsbury Conservation Area was designated in 1968, and has been extended since then.
- 3.8 The quintessential character of the conservation area derives from the grid of streets enclosed by mainly three and four-storey development which has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated by focal points.
- 3.17 ...the predominant type of building is the terraced townhouse. These are generally three or four storeys in height.... generally with basements and attic storeys. Roofs are commonly defined by parapets, giving strong and consistent roof lines.
- 3.18 To the rear of the terraces of townhouses are frequently mews type properties built to stable horses and carriages as well as the coachman of wealthy residents. They are typically modest two storey buildings with large openings on the ground floor, with timber doors and smaller windows above. A few such buildings were used as workshops and retain pulley mechanisms at upper floor levels.
- 3.25 Brick is the predominant building material used... as it was the cheapest locally available material... Red brick is seen in some of the earlier brick built developments of the Tudor and Georgian period, whereas London stock was used from circa 1800.
- 3.29 The terraced townhouses have a number of characteristic details in their design including the repeated pattern of windows, reducing in height from the first floor upwards signifying their reducing significance, with properties generally being three windows across. In key locations the elevations were designed as unified compositions to give a grander, palatial scale, such as the terrace on the east side of Mecklenburgh Square. Windows are mainly sliding sashes, which range from the earliest examples set close to the face of the building and with thicker glazing bars, as are found in houses in Great James Street, to the more delicate division and recessed sashes of the late Georgian and Regency periods of which there are numerous examples. Doorways may have arched openings, flat roof timber porches on brackets, pediments and occasionally porticos. Other common elevation details include segmented heads, rubbed brick arches, the use of stone banding, delicate cast iron balconies and intricate fanlights. At roof level the individual townhouses are terminated with chimney stacks and pots, and in some terraces the party wall is expressed. Roofs are mainly covered in natural slate, but clay tiles can be found on earlier townhouses.
- Sub Area 10: Great James Street/Bedford Row**
- 5.174 The Great James Street and Bedford Row sub area was developed during the Georgian and Regency periods under various ownerships, although part of the street pattern was laid out earlier by Nicholas Barbon. The area has a clear street hierarchy structured on a grid layout. Bedford Row, Doughty Street and John Street are wide thoroughfares characterised by larger properties. There is a progression in scale (and grandeur) from Millman Street, through Great James Street to Bedford Row. There is no planned open space in the sub area, although the more formal streets are characterised by regularly spaced street trees, planted at regular intervals in the pavement.
- 5.175 The historic build form comprises townhouses built in long terraces with rear mews. This fine grain remains an important characteristic and the continuous building frontage created by the terraces creates a strong sense of enclosure.
- 5.176 The townhouses, dating from the 18th and 19th centuries, are either of three or four storeys raised on basements fronted by cast-iron railings. Their vertically proportioned frontages adhere to classical architectural principles; they have three windows per floor establishing a repeated rhythm of window and door openings along each terrace. Common details are wooden architraved door cases, timber panelled doors, fanlights, flat roofed porches or small porticos above. Although the overall perception is of homogeneity; there is subtle variation in the detailing of the terraces, often derived from the piecemeal nature of the building process. The strong uniformity in appearance is due to the consistency of materials. The prevailing materials are London stock brick with

some contrasting red brick detailing (such as segmental red-brick arches). Some stucco is evident at ground floor level. Most frontages are topped by parapets, some with mansard attics and dormer windows behind.

5.177 The mews properties are generally of two storeys (with no basements). There is some architectural variety along Millman Street, which comprises later 20th century housing as well as late 19th century terraces forming part of the Rugby Estate.

5.191 The mews areas mainly have a mixture of small-scale workshop and residential uses consistent with their historic use. Jockey's Fields comprises mews properties serving the east side of Bedford Row of mainly two and occasionally three storeys. The mews is screened from Gray's Inn by a substantial wall. The main uses are office and commercial. Architecturally, there is some variability but the 19th century buildings tend to be of more interest to the conservation area than their 20th century neighbours which are of lesser quality and of a larger scale out-of-keeping with the mews.

5.18 Owners will be encouraged to keep listed buildings occupied as in an appropriate use. The most appropriate use will be to retain a listed building in its original use.

5.31 Design and Access Statements accompanying applications will be expected specifically to address the particular characteristics identified in the appraisal including the formality and regularity of terraced forms and the prevailing scale, mass, form and rhythm created by the historic pattern of development.

Views in Sub Area 10 include:

View south along Great James Street & Bedford Row, terminated by the houses at the end of Bedford Row
The view along Bedford Row & the visual effect of its gradual widening

Regional Policy

The London Plan (March 2021)

In March 2021 the Mayor adopted The London Plan. This is operative as the Mayor's spatial development strategy and forms part of the development plan for Greater London. Policies pertaining to heritage include the following:

Policy HC1 Heritage Conservation and Growth

(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.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (July 2021). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'.

At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

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.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 197 of the NPPF identifies the following criteria in relation to this:

the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and world heritage sites and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 206 states that:

... Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas and world heritage sites it states, in paragraph 207, that:

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that

the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- **archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has

evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.

- **historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the

asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, 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.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 199-203 of the National Planning Policy Framework.

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework (December 2023) requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). 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 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, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- 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

Other Relevant Policy Documents

Historic England: Historic Environment Good Practice Advice in Planning (December 2017)

Historic England: Conservation Principles and Assessment (2008)

Donald Insall Associates