

MADDOX PLANNING

**PLANNING, DESIGN
AND ACCESS
STATEMENT**

NYU London, 6 Bedford Square, Camden

21/08/2024

Description of development

Full planning permission and listed building consent for internal and external alterations at 6 Bedford Square, London, WC1B 3RA.

Type of application

Full planning permission and listed building consent

Applicant

New York University in London (NYU in London)

List of supporting documents

1. Application forms, certificates and notices;
 2. Existing and proposed plans; and
 3. Planning statement (including DAS and heritage note).
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Development plan

The adopted development plan comprises:

1. The London Plan (2021)
 2. The Camden Local Plan (2017)
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Policies map

The following designations on the policies map are particularly relevant:

1. Bloomsbury Conservation Area
 2. Archaeological Priority Area
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Planning policies

The following adopted and emerging planning policies are particularly relevant:

Policy number	Policy title	Referred to in paragraph number of this statement
The London Plan (2021)		
D3	Optimising site capacity through the design-led approach	3.11
HC1	Heritage conservation and growth	3.3, 3.8 and 3.18

G7	Trees and woodlands	3.33
The Camden Plan (2017)		
A3	Biodiversity	3.34
D1	Design	3.12
D2	Heritage	3.4, 3.8 and 3.19

In this Statement, the Applicant gives full weight to policies contained in the development plan but, in accordance with section 38(5) of the Planning and Compulsory Purchase Act 2004, if a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved, or published.

Other material considerations

Other material considerations (such as national planning policy and supplementary planning documents, area action plans and design briefs) include:

1. National Planning Policy Framework (2023)
2. Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

Relevant planning decisions

Reference/address	Description	Status/decision date	Referred to in paragraph number of this statement
2011/3803/P	Installation of 4 air conditioning units with associated pipe work, walkway and access ladders at roof level of No. 6 Bedford Square.	Approved on 15 December 2011	N/A
2010/6938/L	Listed Building Consent for alterations including the creation of linkages between No 4-5 & No 6 Bedford Square at basement and ground floor level, the reinstatement of a staircase between second and third floor within No 4, removal of a modern first floor stud partition wall within No 5, insertion of stud partition walls at basement and third floor level of No 6 and the reconfiguration of toilet layouts in No 4-5 Bedford Square to existing mixed use building (Class D1/B1).	Approved on 22 February 2011	N/A
2009/2240/L	Internal alterations to include new partition walls and two new doors at second floor level to University (Class D1).	Approved on 16 October 2009	N/A

2007/0488/L	Alterations in connection with the division of one existing room at third floor level relating to office use, involving the erection of new internal partitions.	Approved on 23 April 2007	N/A
2006/2639/L	Alterations in connection with the division of rooms at basement and third floor levels relating to office use, involving the erection of new internal partitions.	Approved on 3 October 2006	N/A

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Main benefits of the scheme

The proposed development provides an excellent opportunity to improve the internal and external condition of the Grade I listed building in overall accordance with the development plan policies on heritage and design.

Notably, the proposed development will reinstate and/or maintain internal and external features of the listed building to appropriately preserve its architectural integrity and remove partitions which sub-divide the original room layout in order to restore the historic fabric of this important historic property.

Site and area description

- 1.1 The site address is 6 Bedford Square, London, WC1B 3RA. The site area is approximately 475sqm.
- 1.2 The existing building is a three-storey, terraced property (with a lower ground floor and mansard extensions) that is situated amongst a Grade I listed group which includes all properties between 1 and 10 Bedford Square. The property is stucco fronted and is five bays wide with symmetrical fenestration. The property has a unique appearance that contrasts with the design of the other properties within the terrace. Low steps are situated to the front of the property providing an entrance between the wrought iron railings that sit along the front boundary of the site. There are no trees or hedges to the front of the site.
- 1.3 Pedestrian access can be gained from Bedford Square, though there is currently no vehicle access into the site and no designated parking to the property with restricted parking in surrounding roads. The site has an optimum Public Transport Accessibility Rating of 6b. It is located approximately 0.3 miles to the north of Tottenham Court Road Underground station, 0.4 miles to the southwest of Goodge Street Underground Station, 0.5 miles to the southeast of Russell Square Underground Station and 0.5 miles to the northeast of Holborn.
- 1.4 The site is located within the Bloomsbury Conservation Area and part of the site is also situated within an Archaeological Priority Area. The site is also located within a Flood Zone 1, indicating a low risk of flooding. The building also forms part of a symmetrical group, between 1 and 10 Bedford Square, that are all Grade I listed.
- 1.5 The surrounding area comprises predominantly of three-storey, terraced, Georgian buildings. Adjacent to the front of the site is Bedford Square Gardens and directly to the rear of the site is the British Museum.

Proposed development

2.1 The proposed description of development is:

“Full planning permission and listed building consent for internal and external alterations at 6 Bedford Square, London, WC1B 3RA”.

2.2 The proposed development seeks to undertake several internal and external alterations to the property at 6 Bedford Square. This includes the reversal of previously consented alterations (application ref. 2010/6938/L), comprising the removal of several unoriginal features and reinstating original features to the Grade I listed building.

Layout

2.3 At lower ground floor, an internal door, frame and doorway to 5 Bedford Square would be infilled and the space would be reinstated as original with skirting and decoration to match the existing. In the same room, the proposed works would remove an access ramp (and the associated handrail balustrade). Across the lower ground floor, the layout would be altered through the demolition of several plasterboard and stud walls (to restore the original design of rooms without sub-division) and the removal of other features such as a redundant fan coil unit, utilities, sliding security gates and joinery.

2.4 In the rear courtyard at lower ground floor, the scheme proposes the removal of two bay trees.

2.5 At ground floor, though the layout would be altered minimally, the proposed works would include the removal and infilling of an internal door, frame and doorway to 5 Bedford Square, to be reinstated as original with skirting and decoration to match the existing. The proposed works would also include the removal of a redundant air conditioning unit (with associated casing).

2.6 At first floor, the layout would remain unaltered. However, the proposed works would remove a blocked-up door in order to reinstate a set of internal double doors with decoration and ironmongery to match the original style and size.

2.7 At second floor, the layout alterations would be carried out largely in rooms 211 to 214. The proposed works would demolish the partition walls and doors between rooms 211 and 212 and would relocate the existing air condition units in each room. Additionally, the proposed works would remove the dry lining panel between rooms 213 and 214 in order to reinstate the existing door with new decoration and ironmongery.

2.8 At third floor, the layout would be altered through the demolition of several stud partitions and doors between existing rooms. The demolitions of stud partition walls and doors would occur between rooms 306 to 308 (reverting the space back to a single room), in room 310, between rooms 309 and 315, and between rooms 312 and 313.

2.9 General internal works are proposed across all floors to make good the internal condition of the building. These works would include general repairs; the removal of redundant features (such as noticeboards, signage, shelving, sanitising stations, CCTV cameras etc.); restoration works to sash windows; and the removal and replacement of floor carpets across the building.

Scale and massing

2.10 Although works are proposed to the external areas of the building (including the roof) in order to repair and/or maintain certain features, the height, scale and massing of the building will be unaffected.

External appearance

- 2.11 The works proposed to the external features of the building are for restoration and/or maintenance only.
- 2.12 The external surfaces (including metalwork, railings, balconies, downpipes, hoppers, stucco render, joinery, the external face of window frames and sills, roof level parapet walls and the central roof lightwell) would be redecorated using breathable external paints approved by conservation officers.
- 2.13 At roof level, the proposed works would remove four condenser units serving 4 and 5 Bedford Square. The other four condensers serving No 6 Bedford Square will be retained in situ. Other proposed works at roof level would include the removal and replacement of damaged roofing and roof tiles; the replacement of domed polycarbonate rooflights; and the restoration of brickwork to the chimney stacks, parapets and copings.
- 2.14 To the front and rear of the building (including the central lightwell), restoration would be carried out with the brushing and redecoration of steelwork; the removal and replacement of one flagstone; the remediation of damaged render; the restoration of brickwork; and other minor restoration and/or maintenance works.

Access and parking

- 2.15 The proposed development would have no impact on pedestrian access, nor would it impact the parking restrictions or vehicular access within the vicinity.

Refuse and servicing

- 2.16 The refuse, recycling and servicing will remain unchanged and will continue as per the current operations at the property.

Considerations

3.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws on the application documents listed at Section 1 of this statement. The main planning considerations are:

1. Principle of development;
2. Scale, design and appearance;
3. Heritage; and
4. Fire safety.

Principle of development

- 3.2 Paragraph 203 of the Framework outlines that, when determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- 3.3 Policy HC1 of the London Plan sets out that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 3.4 Paragraph 7.43 (Policy D2) of the Local Plan highlights that the LPA recognises how development can make a positive contribution to, or better reveal the significance of, heritage assets and will encourage this where appropriate. It is said that responding appropriately to the significance of a heritage asset and its setting can greatly enhance development schemes.
- 3.5 Paragraph 5.17 of the Bloomsbury Conservation Area Management Strategy sets out that owners of listed buildings will be encouraged to maintain their building(s) regularly to ensure their condition is improved or appropriately and adequately maintained so that important historic buildings and their architectural features are preserved.
- 3.6 The proposed development would take an opportunity to preserve or enhance the architectural integrity of this important historical building. This would be achieved through the restoration and/or replacement of the historic fabric of the property, as well as through the demolition and removal of various unoriginal features that fail to contribute positively to the heritage asset.
- 3.7 The proposed development gives careful consideration to the heritage status of the building and responds appropriately to the significance of the heritage asset and its setting. This is evidenced by the modest and respectful nature of the proposed maintenance works. The proposed development, both internal and external, would contribute towards the preservation or enhancement of the Grade I listed building, as well as the surrounding Bloomsbury Conservation Area.
- 3.8 As is advised by policies HC1 and D2, the proposed development would avoid causing harm to the special character and appearance of the heritage asset and would respond appropriately to the original character of the Grade I listed building, ensuring that the proposed works would effectively reinstate and/or maintain the features of special architectural or historic interest.
- 3.9 The proposed development would be compliant with the relevant policies set out in the London Plan and Local Plan, as well as the above-mentioned paragraphs of The Framework and should be considered acceptable in principle.

Scale, design and appearance

- 3.10 Paragraph 135 of the Framework highlights the importance of creating beautiful and distinctive places through developments that add to the overall quality of an area, are visually attractive as a result of good architecture, and are sympathetic to local character and history.
- 3.11 Policy D3 of the London Plan outlines that development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
- 3.12 Paragraph 7.2 (Policy D1) of the Local Plan sets out that developments must consider character, setting and the context of neighbouring buildings, as well as the character of the existing building and the wider historic environment.
- 3.13 The proposed development would not increase the height or scale of the Grade I listed building. With due regard to the prevailing local spatial character, local distinctiveness and the proportions of surrounding buildings, the proposed scheme has considered the setting of the site and has, therefore, sought only to make alterations that would make good the internal and external appearance of the property with no additional bulk or mass.
- 3.14 As has been established in the previous sections, the scope of the proposed development would reinstate and/or maintain special architectural or historical features and would thus not include any significant changes to the design or appearance of the building besides alterations that would preserve or enhance the original character.
- 3.15 The proposed internal works would be sympathetic to the character and history of the Grade I listed building and would demolish or remove unoriginal features to re-establish the distinctive quality of the original aesthetic. The proposed external works would be maintenance led and would thus provide an opportunity to enhance the overall quality of the Grade I listed building, as well as the character of the wider historic environment, in a sympathetic manner. The resulting building would be visually attractive and sympathetic to the historical importance of the local area when viewed from the public realm.
- 3.16 The proposed development would be compliant with the aims of the Framework, as well as the relevant policies set out in the London Plan and the Local Plan, and should be considered acceptable in terms of design and appearance.

Heritage assessment

- 3.17 Paragraph 205 of the Framework outlines that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
- 3.18 Policy HC1 of the London Plan highlights that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 3.19 Policy D2 of the Local Plan sets out that 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.
- 3.20 The proposed development would undoubtedly contribute to the preservation or enhancement of the heritage asset and its setting. The proposed development would provide the opportunity for several internal

and external alterations that would reinstate the original character of the property and highlight its historical significance. Careful consideration has been given to the heritage status of the building, which is why the proposed development would be maintenance led.

- 3.21 The proposed demolition or removal of several unoriginal features (including various stud partitions, doors, joinery, utilities and units) would help re-establish the original character and layout of the lower ground floor through to the third floor and reinstate the historic aesthetic through the elimination of modern features.
- 3.22 The proposed removal of the condenser units at roof level and the general maintenance works to the external areas of the building would enhance the historic appearance of the property when viewed from the public realm, ensuring that the building would contribute positively to the Bloomsbury Conservation Area.
- 3.23 The proposed development would be modest and in-keeping, designed with the intention of improving the internal arrangement and enhancing the external aesthetic. This approach would remove unsightly modern additions and reinstate the traditional internal layout. The proposed alterations would not be excessive and would serve only to preserve or enhance the significance of the heritage asset. Therefore, the level of intervention would be proportionate in this instance given the significance of the Grade I listed building.
- 3.24 The heritage assets are clearly and readily definable as the Grade I listed terrace, which includes no. 6 Bedford Square, and the Bloomsbury Conservation Area, in which the building is situated. Nos. 1 to 10 Bedford Square are amongst some of the earliest buildings to have been listed in England, having been added to the Statutory List in October 1951. All the buildings, as well as the attached railings, are Grade I listed.
- 3.25 Like many properties of this age, no. 6 Bedford Square has been the subject of much alteration, renovation and even reconstruction over time. However, despite the very high standards that are set on purely aesthetic grounds, the structural story is often very different. Indeed, the consistent high quality of the facing brickwork of Georgian houses often belies the poor quality of construction of the core of the buildings, particularly of the unseen elements of the buildings.
- 3.26 Often designed to last for the length of their lease, many early Georgian houses, generally leased for 60 years, are now on their 6th life. In Bedford Square many of the foundations have failed over time apparently due to the inadequate nature of the soil on which they were placed. In order to overcome the issue originally large timber beams were inserted.
- 3.27 However, these have been prone to rot and it is known, for example, that no. 6 had to have work undertaken as early as 1889 after the owner wrote to the Estate outlining that failure of his foundations. Most properties have therefore had to be underpinned over time.
- 3.28 Furthermore, the walls at Bedford Square were made of two skins, an outer facework, made of good quality brick (approximately 4.5 inches) and an inner skin of largely poor quality brickwork of anything up to 22.5 inches thick. These two walls were often not bound together, although in Bedford Square it tends to occur, on average, on every tenth course.
- 3.29 Softwood timbers were inserted as the brickwork carried up. These performed several essential functions, from carrying the immediate load of the beams and joists to providing a fixture point for internal joinery such as skirting and dado rails.
- 3.30 However, in extended old age, these have often decayed, resulting in walls bulging. As a result they have often been taken out and steel ties and straps inserted. Steel beams have also been inserted into many of the floors, in order to strengthen the overall sub-standard structure.
- 3.31 Nos. 1 to 10 (inclusive) Bedford Square were subject to significant refurbishment in the early 1980s. This included alterations to the front and rear elevations and other internal alterations. It is likely that the steel beams, which are prevalent throughout no. 6, were added at this stage.

- 3.32 With regards to this application, there would be no loss of historic fabric as a result of the proposed development and there would be no harm caused to the special character and appearance of the Grade I listed building or the surrounding Bloomsbury Conservation Area. For these reasons, the proposed development would be compliant with the aims of the Framework, as well as the relevant policies set out in the London Plan and the Local Plan, and should be considered acceptable in terms of heritage impact.

Arboriculture

- 3.33 Policy G7 of the London Plan highlights that development proposals should ensure that, wherever possible, existing trees of value are retained.
- 3.34 Policy A3 of the Local Plan sets out that the Council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation.
- 3.35 The proposed bay trees to the rear of the property are not considered to have any significant amenity, historical, cultural or ecological value.
- 3.36 The trees are not believed to be of a high grade. They are also concealed from the public realm on Bedford Square and, due to their location at lower ground floor level, are not entirely visible from surrounding windows to the rear. Due to this, they do not make any substantial contribution to residential amenity and are not deemed to be particularly relevant to the property's heritage.
- 3.37 For these reasons, approval should be granted to the removal of the two trees to the rear of the property.

Conclusions

4.1 This planning statement has been prepared on behalf of our client, New York University in London (NYU in London), in support of a full planning application and listed building consent for the proposed internal and external alterations to the Grade I listed 6 Bedford Square, London, WC1B 3RA. This statement demonstrates that the proposal is in accordance with the relevant policies contained within the development plan

4.2 This application seeks full planning permission and listed building consent for the following.

“Full planning permission and listed building consent for internal and external alterations at 6 Bedford Square, London, WC1B 3RA”.

Benefits of the proposal

4.3 The proposed development would cause no harm to the special character and appearance of the Grade I listed building or the surrounding heritage asset and would provide the following benefits:

- Demolishing or removing several unoriginal features that detract from the historical significance of the Grade I listed building; and
- Reinstating and/or maintaining several original features to the Grade I listed building, thus enhancing the significance of the heritage asset.

4.4 Therefore, in accordance with the presumption in favour of sustainable development, we urge this planning application be approved without delay.