



136 BEDFORD COURT MANSIONS
ADELINE PLACE, LONDON WC1B 3AH

Proposal:
INSTALLATION OF ADDITIONAL METAL GUARDING TO EXISTING BALCONY AT 3RD FLOOR LEVEL
Application for planning permission 2014/6409/P

23 November 2014

The Bloomsbury Association objects to this application and wishes to make the following comments.

This application has highlighted three major issues: design quality, the impact of the proposal on the Bloomsbury Conservation Area and the impact on the listed buildings of Bedford Square. All are related, and this proposal has to be considered not only in relation to its impact on the fabric of 122-142 Bedford Court Mansions but also on the setting of the adjoining listed buildings and of the quality of the wider conservation area.

These issues are also reflected in Government policy. The National Planning Policy Framework, March 2012, sets out the Government's planning policies for England and how these are expected to be applied. These include policies concerning design quality and conserving and enhancing the historic environment.

Requiring good design

The Government attaches great importance to design - good design is a key aspect of sustainable development and is indivisible from good planning. The object is to achieve high quality and inclusive design responding to local character and history and reflecting the identity of local surroundings and materials, whilst not preventing or discouraging appropriate innovation. Great weight should be given to outstanding or innovative designs, which help raise the standard of design more generally in the area.

Assessment of visual impact involves an element of subjectivity on the part of the assessor. Professional judgment, taking into account a combination of quantitative and qualitative factors, is now widely accepted as best practice for assessing effects on visual amenity. Our view is that this proposal is neither high quality nor inclusive and is certainly not innovative. It blatantly ignores local character, architectural good manners, history and identity in a way that damages the architectural integrity of the building to which it is a part. Nor does it enhance the conservation area within which it is located. Indeed, it has a severely damaging affect. The National Planning Policy Framework states: "*Permission should be refused for 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*".

This is reflected in Camden's LDF Policy DP24, which states "*The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design*".

Conserving and enhancing the historic environment

122-142 Bedford Court Mansions lies within the Bloomsbury Conservation Area. It was completed in 1896 to designs by Martin and Purchase and Allan Vigers and represents the culmination of a heroic development by the Duke of Bedford that extends along the entire length of Bedford Avenue from Bloomsbury Street. It also serves an important streetscape role at the entry to Bedford Square. The proposed addition of metal railings with a nondescript handrail directly on top of a decorative stone balustrade substantially damages the architectural and historic integrity of the mansion block. The

balustrading tops a three-storey high, stone entrance portico that is the main element of the composition of the front façade facing Adeline Place. It lacks conviction in demonstrating how a contemporary alteration can be made to an historic building without considerable collateral damage and suggests that the design intent may not have been as carefully considered as such an intervention into the fabric of a valuable historic asset should be.

The National Planning Policy Framework states: "*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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional*". It goes on to state: "*Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss*".

This is reflected in Camden's LDF Policy DP25, which states "*In order to maintain the character of Camden's conservation areas, the Council will... only permit development within conservation areas that preserves and enhances the character and appearance of the area*".

Impact on listed buildings

Bedford Square is unique. It is acknowledged as one of the best preserved set pieces of Georgian architecture in London and in 2000, with substantial funding from Bedford Estate, English Heritage and the London Borough of Camden, its public realm underwent careful refurbishment to reflect the asset value of its heritage. All its buildings and the terrace 122-142 Bedford Court Mansions is a part are Grade I listed and English Heritage defines Grade I buildings as being 'of exceptional interest, sometimes considered to be internationally important'.

The broad principles established in national policy and guidance on the historic environment are reflected in the London Plan. Policy 4B.12 seeks to ensure that the protection and enhancement of historic assets in London is based on an understanding of their special character, and form part of the wider design and urban improvement agenda. This recognizes that asset value is more than the fabric of the street's buildings but in the quality of the space that they define. The three-storey high, stone entrance portico of 122-142 Bedford Court Mansions projects from the established building line and is prominent in views to and from Bedford Square. The characteristics of crudely designed, 21st century railings are not compatible with a policy that seeks to protect the special character of Bedford Square. They also fail to meet the objectives of PPS 5 and Policies DP24 and DP25 of the Council's Local Development Framework.

The proposal, because of its prominence, will have a damaging effect on the setting of 40 Bedford Square, directly opposite, and on the setting of neighbouring listed buildings and will not enhance the character and appearance of the Bloomsbury Conservation Area. We note that Policy DP25 states that the Council will "*only permit development within conservation areas that preserves and enhances the character and appearance of the area*" and will "*not permit development that it considers would cause harm to the setting of a listed building*". This proposal, in its present form, fails on both counts.

The Association supports good quality design that will enhance Bloomsbury's streetscape, respect its heritage and its residential and business communities, which, in our view, this does not. With a demonstrable breach of the Council's planning policies DP24 and 25, and of its supplementary planning guidance, we look to the Council to refuse this application.

We would be grateful if you would let us know of any further modification to the application and the meeting date if it is to be decided by Committee. We would also be grateful if you would acknowledge receipt of this communication.

Stephen Heath
On behalf of the Bloomsbury Association

Copies to:

Councillor Adam Harrison, London Borough of Camden

Councillor Rishi Madlani, London Borough of Camden

Councillor Sabrina Francis, London Borough of Camden

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