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Direct Dial: 020 7973 3785

Our refs: L00674132  
L00674171  
L00674192  
L00674370

23 October 2017

Dear Ms Powell

**Arrangements for Handling Heritage Applications Direction 2015 &  
T&CP (Development Management Procedure) (England) Order 2015  
42 BEDFORD SQUARE AND 13 BEDFORD AVENUE LONDON WC1B 3HX  
Application Nos 2017/4807/L, 2017/4808/L, 2017/4814/L, 2017/4814/L**

Thank you for your letters of 5 October notifying Historic England of the recent applications for Listed Building Consent at 42 Bedford Square. The reference numbers for the four related cases are listed above and this letter forms a combined response to the proposals as a whole.

I was very grateful to have the opportunity to meet on site with you and the others involved on 4 October, and to have had the chance to discuss the case again with you by telephone on 20 October.

**Summary**

This is a complex case which involves a considerable amount of harmful and unauthorised alterations that have already been carried out, combined with some works which do conform to an existing consented scheme, and a further layer of works which are newly proposed but not yet implemented.

We advise below that the proposals would benefit from being combined into a single application, and provide detailed advice on specific items discussed on site. We are unable to provide our support at present, but look forward to a successful scheme being brought forward in future.

**Historic England Advice**

As you know, the house is Grade I listed and stands within the Bloomsbury Conservation Area. It is not known who was originally responsible for the design of the houses on Bedford Square, though the project was masterminded by Robert Palmer as agent for the Dowager Duchess of Bedford in the 1770s. John Summerson, the seminal commentator on the period, called the square 'one of the most valuable relics of Georgian London'.



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The works that have been unlawfully carried out are extremely harmful to the significance of this highly designated house. They include, but are not limited to: the cutting of large sections of walling, the removal of fire surrounds, doors and architraves, damage to and removal of dado railing and panelling, alterations to shutters and to walling and plasterwork, and the punching of holes into fine eighteenth-century decorative plaster ceilings.

Based on the discussion held on site, and on the basis of the documents so far submitted, it is clear that the applicants are now convinced of the need to reverse these harmful alterations. Historic England will support the combined effort of the council and the applicants in achieving this goal.

It is also apparent that the best means of organising this effort will be to secure a site-wide strategy that conforms to a single plan of action subject to clear and straightforward control. This can best be achieved by combining the various applications cited above, and the missing proposals for the second floor, into a single application that addresses the house as a whole. A separate application for the less contentious and architecturally separate works in the mews building would also be appropriate.

If the present applications were to proceed in their current form HE would not be in a position to provide its draft letter of Authorisation as there remain significant unresolved elements and various areas of missing information which it will be necessary to draw together.

Anticipating the development of a subsequent, unified application we provide the following areas of detailed advice which we hope will help to expedite the process:

*Additional or clarified information:*

We would expect to see a complete schedule of the unauthorised works that have been carried out in order to make it absolutely clear where repair and reinstatement are required. Any future application should include a set of drawings showing:

- the layout of the house before the recent commencement of works;
- the existing layout marked up in order to show the authorised and unauthorised alterations that have been carried out. These should include internal elevations, sections and ceiling plans where necessary;
- proposed drawings as standard.

In addition to these drawings it will be necessary to know in detail how the large air-handling systems in each room will be dealt with, the repair methodology for the areas of historic fabric that have been affected, and to have photographic evidence of the



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stored joinery and fireplace features and the detail of their reinstatement. These are all areas in which Historic England may wish to comment further in due course.

*Fitted Furniture*

There is a considerable amount of fitted furniture that has been assembled within the house and it is for the Local Authority to determine whether or not this requires Listed Building Consent. That found in the first floor front room is in my view the most contentious of these items: it is wired into the building, has a physical impact on the dado rail which appears to have been altered in order to accommodate it, and alters the appearance of the room by projecting in front of the window and partially obscuring the cornice. Historic England would encourage any opportunity to re-design this feature in order better to reveal the architectural form of the room.

*First Floor Fire Surrounds*

Both fire surrounds at first floor have been removed and are said to be in storage. According to research that was reported on site it would appear that the fire surround previously found in the front room historically belonged in the rear room at first floor. It may be considered a heritage benefit to restore this fire surround to its original position. We would wish to see careful justification of the proposals and a methodology for the reinstatement.

*Attic Ceiling*

At the front of the house at attic level is a room which currently lacks a ceiling. This dates back to the time of the previous owner, but the extant listed building consent was negotiated on the basis that a ceiling would be reinstated here. Given the loss of historic fabric elsewhere in the building, Historic England would support the Local Authority in continuing to seek the reinstatement of a ceiling in this room.

*Service Stair Remnant*

A service stair which formerly led from the second floor to a mezzanine level had, as part of the previous consented scheme, been agreed to be relocated and retained within the building. That this has now been entirely removed from the plan form of the house is regrettable. However, this was not a major feature of the building's significance and I understand it had been subject to considerable alteration. As such, while its wholesale removal is harmful, it may be justifiable if the applicants can demonstrate the delivery of heritage benefits elsewhere as part of the proposals.

*Second Floor Sauna*

A sauna has been installed in the closet wing at second floor and retrospective consent is sought. The insertion of this feature precludes the reinstatement of the staircase discussed above. I do not think it can be argued that the sauna itself is a feature which reveals or enhances the significance of the house, but it is removable and will form part of a room which is otherwise lacking historical detail or character. Again, subject to the consideration of the planning balance as a whole we have no in-



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principle objection to this alteration.

**Recommendation**

Historic England is unable to support the proposals in their current form and if they were to progress further we would withhold our draft letter of Authorisation. However, we are hopeful that, subject to the advice set out above, a successful scheme can be brought forward. To that end if we can be of any further assistance please do not hesitate to contact me.

If these applications are likely to proceed further towards determination by your Council please notify us so that we can provide detailed comments on our position for each application.

Please note that this response related to historic building matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3735).

Yours sincerely

**Matthew Cooper**

Inspector of Historic Buildings and Areas

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cc

Penelope, Viscountess Cobham

Mr Edward Kitchen



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