Townscape, Heritage And Visual Impact Assessment

18-23 Hand Court High Holborn Estate SRG Holborn Ltd.

26th September 2018

Nos. 18-23 Hand Court High Holborn Estate, London WC1

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September 2018



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1 Introduction

1.1 This report has been prepared on behalf of SRG Holborn Ltd. in support of a planning application for the redevelopment of the site which comprises Nos. 18-21 and 22-23 Hand Court, London WC1V 6JF.

Purpose

- 1.2 The purpose of the report is to assess the effect of the proposed scheme on heritage and townscape in the vicinity of the site and to measure that effect against national and local policies relating to urban design and the historic built environment.
- 1.3 This report should be read in conjunction with the drawings and Design & Access Statement prepared by Buckley Gray Yeoman and other application documents.

Organisation

1.4 This introduction is followed by an assessment of the site and of the nature and significance of heritage assets in the vicinity of the development site, and a description in Section 3 of the national and local policy and guidance that is relevant to this matter. Section 4 describes the proposed development and its effects. Section 5 assesses the proposed development against policy and guidance. Section 6 contains a Visual Impact Assessment in respect of the proposed scheme. Section 7 examines the proposal in terms of policy and guidance, and Section 8 is a summary and conclusion. There are various appendices.

Nomenclature

- 1.5 Nos. 18-21 and 22-23 Hand Court are referred as the 'site' throughout this report. The proposals are referred to as 'the proposed scheme' or 'the proposed development'.
- 1.6 In 2015 English Heritage changed its name to 'Historic England' and a new charity, officially called the English Heritage Trust, took the name of English Heritage and

responsibility for managing the National Heritage Collection of more than 400 state-owned historic sites and monuments across England. In this report reference is made both to 'English Heritage' and 'Historic England'.

Author

- 1.7 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. He was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark, and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect, and has a specialist qualification in urban and building conservation.
- 1.8 Assessment and drafting for this report was undertaken by Anne Roache M.A. Anne is a researcher with over 25 years' experience. She has worked for leading commercial organizations in the fields of property, planning and law. Alongside a specialisation in the archaeology, architectural and social history of London, Anne is also a qualified field ecologist, practiced in carrying out a range of ecological surveys.
- 1.9 Historical research and assistance for this report was provided by Dr Ann Robey FSA, a conservation and heritage professional with over twenty years' experience. She has worked for leading national bodies as well as smaller local organizations and charities. She is a researcher and writer specialising in architectural, social and economic history, with a publication record that includes books, articles, exhibitions and collaborative research.

2 The site and its context

- 2.1 This section of the report describes the site and its historical context and provides an assessment of its heritage significance and townscape character.
- 2.2 The site location and the appearance of the existing conditions in and around the site are illustrated in the Design & Access Statement prepared by Buckley Gray Yeoman.

Development of the Holborn area

- 2.3 High Holborn is part of the original Roman route leading west from the City of London. The road - then known as 'Holbourne' - crossed the River Fleet where Holborn Viaduct now stands and rose steeply towards what became known as 'High Holborn'. An important thoroughfare, it was once home to the Bishop of Ely's Palace whose 13th century foundation is commemorated in the name of Ely Place. From the late 16th century, Sir Christopher Hatton occupied part of that site and later Hatton Garden would be driven through the former Bishop's property. The area has been a centre of the legal profession since the 14th century being convenient for Chancery Lane which links High Holborn to Lincoln's Inn as well as to the High Court in the Strand. Soon, High Holborn was lined with Inns and large residences. The surviving 16th century timber-framed façade of Staple Inn Building bears witness to this early period.¹
- 2.4 Gray's Inn, which lies to the north-east of the site, is the smallest of London's four 'Inns of Court' and records show that there have been clerks established on the site since at least 1370. Gray's Inn grew steadily achieving great prestige during the reign of Elizabeth I. Much was rebuilt between 1669 and 1774 and further construction took place during the 18th and 19th centuries. In the 20th

¹ Cherry, B. and Pevsner, N. (1998). The Buildings of England: London 4: North.

- century, some rebuilding took place to replace fabric lost during the Blitz of World War II.
- 2.5 From the 17th century onwards, speculative development of houses and squares on the open fields north of High Holborn began to give the area its characteristic look and feel. In 1665 Bloomsbury Square (originally Southampton Square) was the first garden square of its type in London. It was followed in the 1670s by Red Lion Square and Queen Square, laid out by the prolific developer Dr Nicholas Barbon.
- By the mid-18th century most of the area between High 2.6 Holborn and the northern boundaries of the parish had been built upon including Bedford Square (c.1775). Gower Street (c.1790) and Russell Square (c.1800). A hierarchy of different scales of streets is evident across the area with clear differences between the wider major arterial routes, narrower secondary streets, rear mews and narrow connecting lanes. The spatial character of Gray's Inn also differs, being based on a series of interconnected courtyards and open spaces of varying sizes and scales. A range of building types is evident although the predominant type is the terraced townhouse built of locally sourced London stock brick many incorporating stucco. These terraces are generally three or four storeys in height (plus basement and attic) although there are a number of examples of more modest two-storey townhouses built for workers. Roofs – usually 'butterfly' form - are commonly defined by parapets, giving strong and consistent roof lines incorporating mansards where there is habitable attic space.²
- 2.7 By the middle of the 19th century, parts of the district had become synonymous with overcrowding and slum conditions bringing clearances and new wider roads constructed straight through these areas including Holborn Viaduct and Circus in 1869. This redevelopment

² LB Camden (2011), Bloomsbury Conservation Area Appraisal and Management Strategy.

- culminated in the creation of Kingsway opened by King Edward VII in 1905 which cut a swathe through the old slums forming a major north-south route through west central London and linking, at Aldwych, the ancient eastwest routes of High Holborn and Strand.
- 2.8 High Holborn grew as a major commercial centre alongside the growth of the legal sector. In the 19th century it was characterised by hotels and retail including Gamage's department store at Holborn Circus beside the well-established Leather Lane market. The First Avenue Hotel (now First Avenue House) formed the east side of Brownlow Street.
- 2.9 High Holborn's reputation as a prestigious office location was underpinned by the building of Holborn Bars as the head office of the Prudential Assurance Company in 1879 and the Pearl Assurance Company built their HQ at No. 252 in 1914 (now the Chancery Court Hotel). Proximity to Fleet Street led to the Mirror Group siting their headquarters at Holborn Circus (1961-1994).
- 2.10 Much rebuilt during the late 19th and 20th century, the High Holborn streetscape is today dominated by large office blocks of five to seven storeys, with recent examples considerably higher. The busy, wide thoroughfare of High Holborn provides a clear break between Lincoln's Inn and Gray's Inn and the separation between the busy thoroughfare and the quiet, private spaces of Gray's Inn remains demarcated by the Grade II listed Tudor gateway dating from 1583.³

Hand Court

2.11 Running north-south between Bedford Row and High Holborn is a passage shown on John Rocque's map of 1746 (fig. 1) as 'Hand Alley'.

³ Ibid.

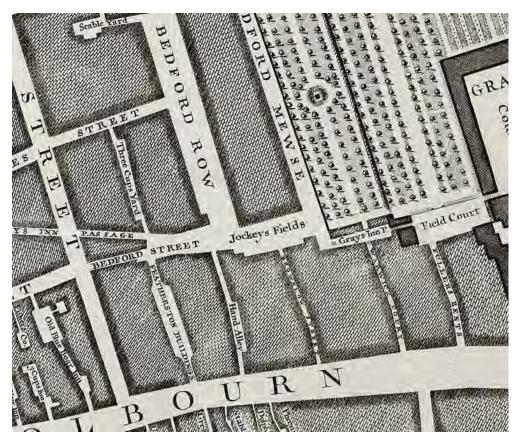


Figure 1: Rocque's map of London, 1746

2.12 By the time of Horwood's map of 1792-99 it is known as Hand Court (fig. 2) and shows many small properties located there. The passageway was named after the Handin-Hand Tavern which stood at the south-eastern corner with High Holborn. (A pub, now gone, is still shown at this location on the 1914 OS map (fig. x)).

⁴ Walford, Edward (1878), 'Red Lion Square and neighbourhood', in Old and New London: Volume 4.

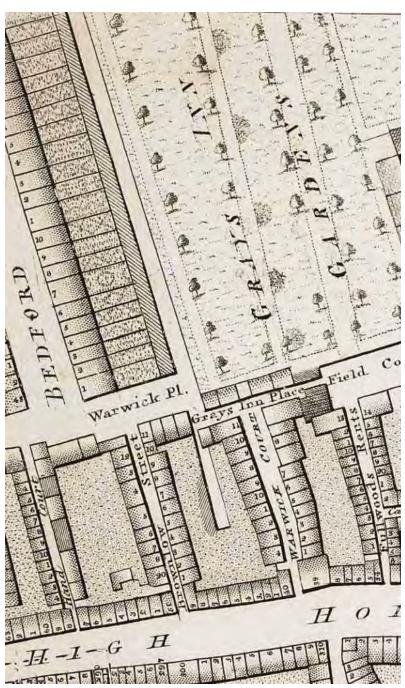


Figure 2: Horwood's map of 1792-99

2.13 An undated plan of the mid-19th century shows the layout of the Tavern, now known as 'The Vine Tavern' (fig. 3). The plan shows the relationship between the various surrounding courtyards and outbuildings of the block

Bottle Monte

Tree View Stands

Tree View Stands

Sourt York

Sourt Yard

Sourt Yard

bounded by Brownlow Street, High Holborn and Bedford Street. The full plan is reproduced as Appendix A.

Figure 3: Plan of the Vine House Tavern Hand Court

2.14 Another public house stood on the north-eastern side of Hand Court, probably since the 18th century, which a plan from 1828 names as the 'Wheatsheaf Tavern' (fig. 4⁵).

⁵ London Metropolitan Archives: Collage online: https://collage.cityoflondon.gov.uk. © LMA Reproduced under licence.

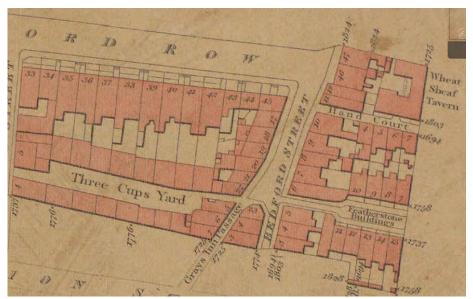


Figure 4: Plan of Bedford Estates situated in the parishes of St Andrew, Holborn and St George the Martyr, Holborn, 1828

- 2.15 Both public houses can be seen on the 1914 OS map (fig. 8).
- 2.16 At the end of the 1890s, the researchers for Charles Booth's London Poverty Survey described Hand Court as having 'small shops' and 'old picture and curio shops'. A photograph of 1920 illustrates what it probably would have looked like around the time of the survey (fig. 5).

 $https://collage.cityoflondon.gov.uk. \\ @ LMA \ Reproduced \ under \ licence.$

⁶ London School of Economics, Booth's London Online: https://booth.lse.ac.uk

⁷ London Metropolitan Archives: Collage online:



Figure 5: Hand Court in 1920 [© London Metropolitan Archives Collage Collection 72574]

- 2.17 Described as working-class but not poor; the Booth survey also noted that 'the north-east end was rebuilding'. This undoubtedly referred to the rebuilding of the Vine House Tavern and the corner property, No. 45 Bedford Row, as well as the adjoining two shop premises at Nos. 2 and 2A Hand Court.
- 2.18 In 1912 The Times reported that James R. McDonald, Surveyor of No. 45 Bedford Row was advertising the property as 'spacious and light suites of offices on ground, second and third floor' to be let in a modern building with lift. Rents were between £40 and £160 per annum. In addition, the two shops at Nos. 2 and 2A Hand Court were also advertised.⁸
- 2.19 The Vine House Tavern was rebuilt 1897-98 to the designs of the architect Horace M. Wakley and renamed the 'City of New York'. Wakley gave the four-storey terracotta-

⁸ The Times, 21 May 1912.

⁹ Horace Wakley was an architect member of a publican family and produced elaborate interiors, and according to Mark Girouard in Victorian Pubs (1982), p.138, liked to 'pepper his exteriors with coloured faience columns and little cupolas'. Other PH's by him include Cantons (now Spice of Life) at Cambridge

fronted building Renaissance detailing on the exterior and, inside a highly ornate plasterwork finish in the style typical of many grand public houses of the period (figs. 6 & 7).¹⁰



Figure 6: Nos. 18-21 Hand Court, the former City of New York Public House, 2017



Figure 7: The Lounge Bar of the Veterans Club showing the exuberant interior c.1911

Circus (1899), Essex Head PH (now the Edgar Wallace), Essex Street, Strand (1900), Ye Angel Hotel, (now Bon Marche) Ilford (1877).

¹⁰ *Op. cit.* Cherry, B. & Pevsner, N. (1998).

- 2.20 The City of New York operated as a public house, with a music licence, from 1899. By 1910 it had become associated with No. 47 Bedford Row when a Frank A. Becton was noted to be 'the proprietor of City of New York, Hand Court, Holborn WC & 47A Bedford Row WC'. 11 In 1911, the Hand Court premises became a club for ex-servicemen known as the 'Veterans Club'. The club had been founded in 1907 by Major Arthur Haggard, and these new premises were intended to provide accommodation and club rooms to ex-warrant officers, petty officers, non-commissioned officers and 'ordinary men of the services'. 12
- 2.21 The OS Map of 1914 shows the building in Hand Court physically joined to No. 47 Bedford Row (fig. 8).

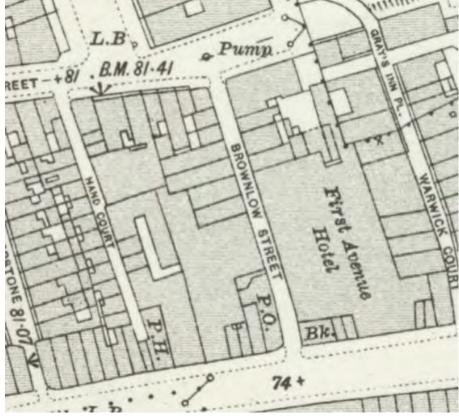


Figure 8: OS map extract, 1914

¹¹ Pub History. Online:

http://pubshistory.com/LondonPubs1910/London1910C2.shtml

¹² The Times, 18 January 1911.

- 2.22 Membership of the Veterans Club increased rapidly after the outbreak of the First World War and in 1917 an appeal for funds was launched for an extension to be built owing to 'heroes of the war', coming home 'stranded, incapacitated and homeless'. By 1919, the club had 6,000 members and it was intended to find larger premises closer to Charing Cross but in the interim it was hoped to increase the number of bedrooms provided at Hand Court. It seems however that the planned extension didn't happen as an adjacent bakery to the south itself expanded in the mid-1920s. 15
- 2.23 The club remained and ten years later, with the bakery gone, the decision was made to develop that site as additional bedrooms. In 1934, Alister. G. MacDonald¹⁶, ARIBA of No. 14 John Street, Adelphi was appointed to draw up plans. These included proposals to replace the one-storey bakery building at the rear of the building with a two-storey block of sleeping cubicles, with windows overlooking the enclosed courtyard (Appendix B). These plans were rejected but amended designs were given permission and in May 1935 the former bake house was altered to provide offices.¹⁷ It is unclear whether all of the proposed works were carried out.

Post War: Bedford Row and Hand Court

2.24 Bedford Row and Hand Court suffered extensive bomb damage during the Second World War, as did the whole of the surrounding area. The west side of Hand Court was

¹³ The Times, 19 November 1917.

¹⁴ The Times, 25 September 1919

¹⁵ LMA GLC/AR/BR/06/059968

¹⁶ Alister MacDonald (1898–1993) was the son of the first Labour Prime Minister Ramsey MacDonald and a prominent architect who worked on promoting the planning policies of his father's government, and who specialized in cinema design and news cinemas in the post-war period. His works in London include Nos. 18-20 Jermyn Street (Gordon Chambers); No. 71 Dean Street; No. 1 Soho Square (1925), No. 3 Golden Square, Aldine House for JM Dent & Sons at Nos.10-13 Bedford Street (1911), Nos. 75 & 77 Shaftesbury Avenue (1905), and No. 11 Great Marlborough Street (1910).

¹⁷ LMA GLC/AR/BR/06/059968

particularly badly affected and the OS map published in 1952 shows the western side of Hand Court and a number of surrounding sites marked as 'Ruins' (fig. 9).



Figure 9: OS Map Surveyed 1951: published 1952

- 2.25 The Veterans Club left the premises in 1948 and new tenants, The West Central Jewish Settlement and Club (WCJSC) which had lost its original premises to bomb damage, moved in. The building became known as 'Montagu House' after Lily Montagu the founder of the West Central Jewish Girls' Club and Institute.¹⁸
- 2.26 In 1951 the WCJSC engaged the same Alister MacDonald who had previously drawn up the alteration plans for the Veterans Club. The club wished to use part of the premises as a non-residential club along with ancillary offices and caretaker's quarters, with the remainder as offices. ¹⁹ The proposed works were said to involve 'minor

¹⁸ The Jewish Settlement and Club worked for the promotion of the physical, mental and spiritual benefit of members. It had originally been founded in 1893 by Lily Montagu (of the banking family), as the West Central Jewish Club.

¹⁹ Camden Planning Application 7074 (27 July 1951)

changes' and internal alterations including the changing of bedrooms into classrooms and offices, but with the old club accommodation remaining as it was in order to stage social events.²⁰ Permission for the works was granted in September 1951. The plans are included as Appendix C.

2.27 Figure 10 shows the ground floor plan of No. 47 with a new entrance, No. 47A, now forming the main access to the club rooms to the rear. The upper floors were used as office accommodation. The main stair from basement to first floor had been removed and the general circulation reconfigured.

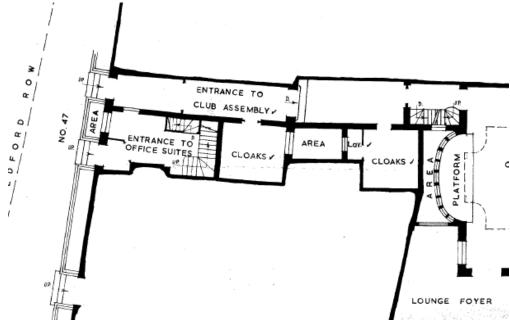


Figure 10: Ground floor plan of No. 47 Bedford Row (extract), 1951

- 2.28 In 1952, the builders Kashnor of Tottenham Mews, added bath and lavatory accommodation to a non-residential unit in Montagu House at Nos. 20-22 Hand Court.²¹
- 2.29 In 1953, an application was made by the WCJSC to use the 1st floor front room of No. 47, Bedford Row as a showroom, and the 3rd floor back room for packing and despatch.²² In 1967, Alister MacDonald once more

²⁰ Ibid.

²¹ Camden Archives and Local History Centre Drainage Plan Microfiche (1952)

²² Camden Planning Application 2456 (9 June 1953)

- worked on the premises creating a new cloakroom and toilets in the basement of the club.²³
- 2.30 In 1971, the Greater London Council described the club thus: 'these premises are large and rambling and comprise of a large lounge, concert hall and stage and many offices and auxiliary rooms. There are three floors and a basement all of which are in use and there is communication with adjacent premises under separate tenants'.²⁴
- 2.31 In May 1974, the terrace comprising Nos. 46-48 (consecutive) Bedford Row was listed Grade II.
- 2.32 In 1989 the WCJSC was granted permission for a change of use into mixed use with residential and offices.

 Renovation works all at ground floor level were carried out to No. 47A Bedford Row, which was at the time still an office as well as the entrance hall and cloakroom of the club, in order to 'form professional chambers' that combined office and residential accommodation.²⁵
- 2.33 No. 25 Bedford Row and the adjoining two former shop premises at No. 2 and 2A Hand Court were rebuilt at the turn of 20th century although the shops at ground floor level have been replaced by office accommodation (fig. 11).

²³ Camden Archives and Local History Centre Drainage Plan Microfiche (1967)

²⁴ LMA GLC/AR/BR/13/089469

²⁵ Ibid.



Figure 11: Hand Court, 2017

- 2.34 Hand Court lost much of its charm in the later 20th century due to rebuilding on its west side and is now overshadowed by the MidCity Place development.²⁶ Nonetheless, Nos. 22-23, the former 'City of New York' public house building survives, its four-storey façade retaining its lavish terracotta decorative detailing.
- 2.35 Bedford Row remains an impressive enclave of Georgian domestic architecture described in the Bloomsbury Conservation Area Appraisal as: 'a fine example of an early Georgian street which still retains its original character', noting that 'The grade II listed Nos. 46-48 Bedford Row terminate the view south along Bedford Row, as seen from Theobald's Road'.²⁷

²⁶ Ibid.

²⁷ Op. cit. London Borough of Camden (2011).

The heritage and townscape context of the site

2.36 This section describes the nature of the site and its surroundings.

Conservation areas

- 2.37 Hand Court is located in the Bloomsbury Conservation Area which was first designated by Camden Council in 1968 and subsequently extended. The current Conservation Area Appraisal ('CAA') was adopted in April 2011.²⁸
- 2.38 The Bloomsbury Conservation Area is large, covering 160 ha, and so is subdivided into smaller areas. Hand Court lies within sub-area 9: Lincoln's Inn Fields/Inns of Court/High Holborn.

Listed structures

- 2.39 There are more than 1000 buildings and structures within the Bloomsbury Conservation Area on the statutory list of buildings of Architectural or Historic Interest. Many of its squares are protected under the 1931 London Squares Act and a number are on the Register of Parks and Gardens of Special Historic Interest.
- 2.40 Figure 12 indicates the location of those listed buildings closest to the Hand Court and the High Holborn Estate.²⁹

²⁸ Op. cit. London Borough of Camden (2011).

²⁹ Ibid.

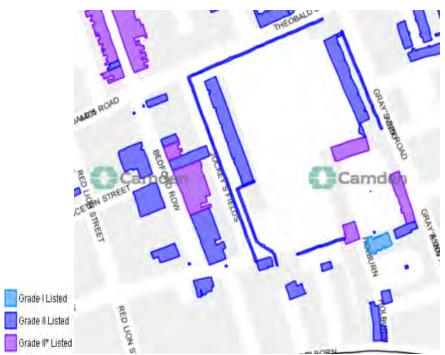


Figure 12: Location of listed buildings in vicinity of the High Holborn Estate

- 2.41 The group comprising of Nos. 46, 47 and 47A and 48
 Bedford Row and attached railings are listed Grade II
 under the Planning (Listed Buildings and Conservation
 Areas) Act 1990 as amended for their special architectural
 or historic interest.³⁰ The List description reads:
 - '3 terraced houses. Late 18th century, altered. No. 47 with two entrances. Yellow stock brick. 4 storeys and basements. Nos. 46-48 (consecutive) form a group closing the vista at the south end of the street'.
- 2.42 In the wider context Bedford Row contains many Grade II and II* listed buildings, as well as a Grade II K2 telephone kiosk, bollards and cast-iron water pump opposite Brownlow Street.
- 2.43 The site falls within Camden's 'London Suburbs' Archaeological Priority Area.³¹

³⁰ Historic England: https://historicengland.org.uk/listing/the-list/list-entry/1244583

³¹ https://content.historicengland.org.uk/content/docs/planning/apacamden.pdf

2.44 The 16th century walks and gardens of Gray's Inn, laid out under the direction of Francis Bacon, and altered from the 18th century onwards is registered Grade II* under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks and Gardens by English Heritage for its special historic interest.³²

Locally listed buildings

- 2.45 There are no locally listed structures in Hand Court of within the High Holborn Estate however *all* the unlisted buildings within the Estate with the exception of No. 18 Hand Court and Nos. 55-57 High Holborn are considered to make a 'positive contribution' to the character of their immediate surroundings and to the Conservation Area as a whole.³³
- 2.46 Nos. 19-23 and 24 & 25 are listed as 'Positive Contributors' to the Bloomsbury Conservation Area.
- 2.47 The other buildings which make a 'positive contribution' include:
 - Sub-area: 9: High Holborn: Brownlow House (Nos. 50-51), High Holborn House (Nos. 52-54);
 Brownlow Street: Nos. 8, 9, 10, 14–19, flank of High Holborn House, flank of Brownlow House.
 - Sub-area: 10: Bedford Row: Nos. 18, 19, 20, 22, 22, 24, 25, 26, 27, 28, 37, 38, 39, 40, 41, 44 and 45

2.48 Key Views include:

- Sub-Area 9: Glimpse views north & south along alleys and side streets off High Holborn; and the view east and west along High Holborn.
- Sub-Area 10: View south along Great James Street and Bedford Row terminated by the houses at the end of Bedford Row; and the view along Bedford Row and the visual effect of its gradual widening.

³² https://historicengland.org.uk/listing/the-list/list-entry/1000351

³³ Op. cit. London Borough of Camden (2011).

Registered landscapes

2.49 Gray's Inn, as a whole, is included at Grade II* on the Register of Historic Parks and Gardens ³⁴ maintained by Historic England. Lincoln's Inn Fields is included at Grade II.

Townscape character and heritage significance

Assessing heritage and townscape significance: definitions

- 2.50 The listed buildings, conservation areas and registered landscapes are 'designated heritage assets', as defined by the National Planning Policy Framework (NPPF). Locally listed building are 'non-designated heritage assets'. 'Significance' is defined in the NPPF as 'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic'. The English Heritage 'Planning for the Historic Environment Practice Guide' puts it slightly differently as 'the sum of its architectural, historic, artistic or archaeological interest'.
- 2.51 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (English Heritage, April 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.

The Conservation Area Appraisal

2.52 The conservation area appraisal for Sub Area 9: Lincoln's Inn Fields/Inns of Court/High Holborn notes that the area is

'characterised by a series of views across the open spaces to surrounding buildings, and a number of glimpse views along narrow passageways and underneath buildings to adjacent courtyards and gardens'. The description of Sub

³⁴ A 'garden or other land is registered under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks and Gardens by English Heritage for its special historic interest'.

Area 10: Great James Street/Bedford Row highlights that the 'historic built 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'.

The significance of the buildings of the High Holborn Estate and their context

- 2.53 The architectural and historic interest of the High Holborn Estate derives specifically from the architectural design and external appearance of its constituent buildings, from their shape, massing and urban presence, and from their history and associations.
- 2.54 The listed buildings in the vicinity of the High Holborn Estate, the Bloomsbury Conservation Area and the Registered Landscape are all 'designated heritage assets', as defined by the National Planning Policy Framework (NPPF).
- 2.55 'Significance' is defined in the NPPF as 'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic'. The English Heritage 'Planning for the Historic Environment Practice Guide' as 'the sum of its architectural, historic, artistic or archaeological interest'.
- 2.56 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (English Heritage, April 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.
 - The heritage significance of Nos. 18-21 and 22-23 Hand
- 2.57 The Bloomsbury Conservation Area Appraisal describes Hand Court thus:

'Hand Court is a passage dating from the 17th century, linking High Holborn with Sandland Street. It lost much of its charm in the 20th century due to rebuilding and has recently been re-modelled and overshadowed by the new Mid City Place development which dominates its west side. Nonetheless, No. 23 has survived; built as the former City of New York public house in 1897-99 by Horace M Wakley, its four-storey brown terracotta front has lavish Renaissance detail'.

- 2.58 The CAA identifies Montagu House, Nos. 19-23, 24 & 25 Hand Court as making a positive contribution to the conservation area. The built reality of Hand Court is that No. 24 forms part of No. 45 Bedford Row; Nos. 22 and 23 is a separate four storeys plus mansard building, referred to in the CAA; and Nos. 18-21 Hand Court is an approximately three-storey building that abuts the rear of Caroline House at Nos. 55-57 High Holborn.
- 2.59 Whilst the aesthetic value of Nos. 22 & 23 is evident, that of Nos. 18-21 is less obvious and the CAA makes no reference to it. It is an odd, squat, elongated building with an entirely late 20th century and poor quality ground floor, surmounted by a third floor that appears to be an ad-hoc mixture of mansard and masonry. While it obviously has some historic significance in the conservation area, it is hard to see how the building can be assessed as making anything more than a neutral contribution.

The heritage significance of Nos. 46, 47, 47A and 48 Bedford Row

2.60 As a group of listed buildings, Nos. 46, 47, 47A and 48
Bedford Row clearly possesses considerable interest or
value both as individuals and as a group, being good
examples of the predominant built form found across the
Bloomsbury Conservation Area, reflecting the speculative,
(mainly) residential development of the Stuart, Georgian,
Regency and early Victorian periods. This gives a

- distinctive, repeated grain to large parts of the Conservation Area.
- 2.61 The group has historic, evidential and (to a certain extent) communal value by illustrating the development of the area in the 18th and 19th centuries and in particular the evolution of the built environment of Bloomsbury and of London as a whole throughout the Georgian period. The nature of what has happened to these buildings subsequently provides evidence as to the kind of change that houses in Bedford Row and the surroundings streets experienced as they changed from predominantly residential to commercial uses.
- 2.62 Nos. 46, 47, 47A and 48 Bedford Row are listed buildings (i.e. a designated heritage asset), and thus have 'special architectural and historic interest'. This interest or significance is located in their external appearance (principally to the street); in the fragmentary remains of an early or original plan layout; and in the random decorative features of a number of periods. Of these things, the 19th century external appearance to Bedford Row survives largely intact, whereas the plan layout and internal decoration of the listed buildings has been very considerably altered. There is some, but much lesser, interest in the rear elevations.
- 2.63 It is clear that, despite the changes that have occurred, Nos. 46, 47, 47A and 48 Bedford Row have 'architectural' and 'artistic interest' (NPPF) or 'aesthetic value' ('Conservation Principles'). In respect of design, 'Conservation Principles' says that 'design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship'.
- 2.64 The association in the 20th century of Nos. 47 and 47A with both the Veterans Club and The West Central Jewish Settlement and Club, during which time they played an important part in the social and cultural development of

- mid-20th century Bloomsbury, means that the buildings can be accorded considerable communal vale.
- The heritage significance of 45 Bedford Row
- 2.65 No. 45 Bedford Row is considered in the Conservation Area Appraisal to make a 'positive contribution' to the character of their immediate surroundings and the Conservation Area as a whole.
- 2.66 Evidence suggests that the present building was built in the late 19th/early 20th century and appears to have replaced a late Georgian/early Victorian building shown on the 1870s OS survey map.
 - The heritage significance of Brownlow House, 50-51 High Holborn and High Holborn House (basement), 52-54 High Holborn
- 2.67 Both Brownlow House and High Holborn House are considered by the Bloomsbury CAA to make a positive contribution to the character and appearance of the Conservation Area. The early 20th century Brownlow House and 1930s High Holborn House are adjacent to Caroline House (Nos. 55-57 consec.) by George Davies which dates from 1956-57. Immediately abutting Caroline House, and incorporating an arched entrance to Hand Court, is one of the most recent and largest commercial buildings in High Holborn, MidCity Place (built 1999-2002).
- 2.68 Except at its western end towards the junction with Kingsway and Southampton Row, almost all of the buildings in High Holborn date from the 20th century inter-war and post-war periods. These buildings are a reminder of the increasing rarity of surviving mid-20th century commercial buildings and their particular contribution to social and economic history. The character of High Holborn is such that there is inconsistency of architectural style, plot widths and building heights however, both sides of the street are becoming increasingly dominated by large modern office buildings of varying quality. The relatively smaller scale of

- Brownlow House and High Holborn House respect, to some extent, the historic urban grain of earlier periods.
- 2.69 The public realm in this area of High Holborn is defined by the contrast of the busy thoroughfare and the quiet tributaries of the side streets and alleyways leading to secluded spaces to the north and south of a distinctly different character. This contrast adds to the interest and vibrancy of the area, where old and new stands side-by-side.

'Historic interest' or 'Historical value'

- 2.70 The buildings of the High Holborn Estate, the listed and unlisted buildings nearby, and their relationship to one another, the Registered Landscape and the Bloomsbury Conservation Area collectively illustrate the development of this part of London. Historical value is described as being illustrative or associative. The story of the Estate illustrates a good deal about how London evolved from the 17th to present times, about the transformation of the old landed estates and about social change and lifestyles during that period.
- 2.71 Nos. 46 and 47/47A and 48 Bedford Row are clearly buildings of special historic interest as acknowledged by their Grade II listing. These are good examples of late 18th century townhouses that illustrate the historic development of the fine Georgian Street that is Bedford Row.
- 2.72 In terms of English Heritage's 'Conservation Principles' the buildings provides us with 'evidence about past human activity' and by means of their fabric, design and appearance communicates information about its past. Subsequent alteration has not entirely denuded their exteriors of their ability to do this, though the original character of the interiors has been somewhat compromised by later renovations, leaving the exterior to largely convey their historic character.
- 2.73 The surrounding area clearly has associations with important individuals and bodies, in terms of notable

- former residents, as well as the architects and developers who created the Bloomsbury area.
- 'Architectural interest', 'artistic interest' or 'aesthetic value'
- 2.74 It is clear that Nos. 46 and 47/47A and 48 Bedford Row are buildings of special architectural interest as acknowledged by their Grade II listing. In terms of the layout and appearance of the buildings, Nos. 46 and 47/47A and 48 retain a sense of Georgian townhouses albeit with some significant internal alterations.
- 2.75 The houses have 'architectural' and 'artistic interest' (NPPF) or 'aesthetic value' ('Conservation Principles'). In respect of design, 'Conservation Principles' says that 'design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship'. The buildings retain the features of the original external design that contribute to each of these qualities. However, significant changes have occurred, and these are described in the preceding part of this section.

3 The policy context

3.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the built environment.

The Planning (Listed Buildings and Conservation Areas) Act 1990

3.2 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66(1) of the Act requires decision makers to '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" when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.

The National Planning Policy Framework

- 3.3 The revised National Planning Policy Framework was issued on 24 July 2018, replacing the previous National Planning Policy Framework published in March 2012.
- 3.4 Paragraph 124 of the NPPF says that 'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.
- 3.5 Paragraph 127 says that planning policies and decisions should ensure that developments:

'...are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); [and]

...optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks...'

- 3.6 Paragraph 131 says that 'In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings'.
- 3.7 Chapter 16 deals with 'Conserving and enhancing the historic environment'. Paragraph 128 that:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 3.8 A description and analysis of the heritage significance of the Hand Court site and its context is provided earlier in this report.
- 3.9 The NPPF (at Paragraph 190) also requires local planning authorities to '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 assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise

conflict between the heritage asset's conservation and any aspect of the proposal'.

3.10 At Paragraph 192, the NPPF says that:

In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.
- 3.11 Paragraph 193 advises local planning authorities 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

3.12 Paragraph 195 says:

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, or all of the following apply:

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

- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.
- 3.13 Paragraph 196 says that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.
- 3.14 Further advice, at Paragraph 197, urges local planning authorities to take into account the effect of an application on the significance of a non-designated heritage asset when determining the application. It says that 'In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.
- 3.15 Paragraph 200 of the NPPF advises 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. 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'.

Planning Practice Guidance

- 3.16 In 2014 the government published new streamlined planning practice guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the section entitled 'Conserving and Enhancing the Historic Environment'. It is subdivided into sections giving specific advice in the following areas:
 - Historic Environment Policy and Legislation

- Heritage in Local Plans
- Decision-taking: Historic Environment
- Designated Heritage Assets
- Non-Designated Assets
- Heritage Consent Processes and
- Consultation Requirements
- 3.17 The government is consulting on revised Planning Practice Guidance in conjunction with the revised NPPF.

Historic England's Good Practice Advice in Planning Notes

- 3.18 The NPPF incorporates many of the essential concepts in Planning Policy Statement 5 'Planning for the Historic Environment'. PPS5 was accompanied by a 'Planning for the Historic Environment Practice Guide', published by English Heritage 'to help practitioners implement the policy, including the legislative requirements that underpin it'. In the light of the introduction of the NPPF, Good Practice Advice notes 1, 2 and 3 supersede the PPS 5 Practice Guide, which was been withdrawn on 27 March 2015. These notes are:
 - Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans
 - Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment
 - Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets
- 3.19 The latter Note replaces 'The Setting of Heritage Assets: English Heritage quidance' (October 2011)

3.20 The advice provided in the notes largely echo that of the former Practice Guide. At Paragraph 26, Practice Note 2 says:

Successful sustainable development achieves economic, social and environmental gains jointly and simultaneously through planning decisions (NPPF, Paragraph 8). If there is any apparent conflict between the proposed development and the conservation of a heritage asset then the decision-maker might need to consider whether alternative means of delivering the development benefits could achieve a more sustainable result, before proceeding to weigh benefits against any harm.

Historic England guidance on the setting of heritage assets

- 3.21 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. The document provides 'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG)'.
- 3.22 The guidance echoes the definition of 'setting' in the NPPF as 'the surroundings in which [the asset] is experienced', and continues: 'its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.
- 3.23 The guidance provides, at Paragraph 12, a step-by-step methodology for identifying setting, its contribution to the significance of a heritage asset, and the assessment of the effect of proposed development on that significance:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.
- 3.24 The document then sets out how the step-by-step methodology is used and considers each step in more detail.

The London Plan

- 3.25 The London Plan 2016 (consolidated with alterations since 2011) is the current the spatial development strategy for London. This document, published in March 2016, is consolidated with all the alterations to the London Plan since 2011. It contains various policies relating to architecture, urban design and the historic built environment.
- 3.26 Policy 7.4 deals with 'Local character', and says that a development should allow 'buildings and structures that make a positive contribution to the character of a place, to influence the future character of the area' and be 'informed by the surrounding historic environment'.
- 3.27 Policy 7.8 deals with 'Heritage assets and archaeology', and says:

A London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes,

conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

3.28 Policy 7.9 deals with 'Heritage-led regeneration', and says:

- A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.
- B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration.

Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

- 3.29 Consultation on the Draft New London Plan occurred in recent months, and closed in early March 2018. The Draft London Plan is a material consideration in planning decisions. It gains more weight as it moves through the process to adoption though 'the weight given to it is a matter for the decision maker'.
- 3.30 A new policy, Policy HC1 'Heritage conservation and growth', echoes the policies of the current London Plan. Policy HC1C says:

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 seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

3.31 Policy HC1E says:

Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and reuse.

Camden Council's Local Plan

3.32 Camden Council adopted its Local Plan in June 2017. The Plan sets out the Council's planning policies. It replaces Camden's Core Strategy and Development Policies planning documents (adopted in 2010).

- 3.33 Section 7 of the Plan deals with Design and Heritage saying that 'the Council places great importance on preserving the historic environment'.
- 3.34 Policy D1 Design says that:

'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,
- *I. 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.'
- 3.35 Policy D1 also addresses Tall Buildings, Public Art and Excellence in Design.
- 3.36 Policy D2 Heritage deals with Camden's heritage assets. The policy says that:

'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.'

3.37 In relation to designated heritage assets generally the policy says:

'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.'

- 3.38 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'.
- 3.39 In relation to conservation areas the policy says:

'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.'

3.40 In relation to Listed Buildings the policy says:

'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.'

3.41 In relation to other heritage assets and non-designated heritage assets including those on and off the local list, Registered Parks and Gardens and London Squares the policy states:

'The effect of a proposal on the significance of a nondesignated 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.'

3.42 Sections 7 7.42-7.69 discuss the detail of the Council's approach to implementing Policy D2 under the following headings: Enhancing the historic environment (7.42-7.43); Designated Heritage Assets (7.44-45); Conservation Areas (7.46-7.56); Listed Buildings (7.57-7.62); Archaeology (7.63-7.67); 'Other' and Non-designated heritage Assets (7.68-7.69).

Guidance on urban design and the historic built environment

- 3.43 The English Heritage/CABE (now the Design Council) guidance 'Building in Context' gives guidance on the design of new development which affects the historic environment, and particularly conservation areas. It sets out good practice guidance on the design of new development in historic areas. It has subsequently been developed by Historic England and Design Council into a dedicated website on Building in Context³⁵.
- 3.44 The eight *Building in Context* principles are:
 - A successful project will start with an assessment of the value of retaining what is there;
 - A successful project will relate to the geography and history of the place and lie of the land;

³⁵ http://www.building-in-context.org/

- A successful project will be informed by its own significance so that its character and identity will be appropriate to its use and context;
- A successful project will sit happily in the pattern of existing development and the routes through and around it;
- A successful project will respect important views;
- A successful project will respect the scale of neighbouring buildings;
- A successful project will use materials and building methods which are as high quality as those used in existing buildings;
- A successful project will create new views and juxtapositions which add to the variety and texture of the setting.
- 3.45 The guidance explains the importance of basing designs on thorough analysis of the context and warns against the application of simple formulae such as 'fitting in' or 'contrasting the new with the old'. It advises that successful projects will:
 - Relate well to the geography and history of the place and the lie of the land;
 - Sit happily in the pattern of existing development and routes through and around it;
 - Respect important views;
 - Respect the scale of neighbouring buildings;
 - Use materials and building methods which are as high in quality as those used in existing buildings; and
 - Create new views and juxtapositions that add to the variety and texture of the setting.
- 3.46 The guidance contains a number of case studies and draws a number of specific conclusions from them:

- The best buildings result from a creative dialogue between the architect, client, local planning authority and others; pre-application discussions are essential;
- The local planning authority and other consultees can insist on good architecture and help to achieve it;
- Difficult sites should generate good architecture, and are not an excuse for not achieving it;
- With skill and care, it is possible to accommodate large modern uses within the grain of historic settings;
- High environmental standards can help generate good architecture;
- Sensitivity to context and the use of traditional materials are not incompatible with contemporary architecture;
- Good design does not stop at the front door, but extends into public areas beyond the building;
- High-density housing does not necessarily involve building high or disrupting the urban grain and it can be commercially highly successful;
- Successful architecture can be produced either by following historic precedents closely, by adapting them or by contrasting with them;
- In a diverse context a contemporary building may be less visually intrusive than one making a failed attempt to follow historic precedents.

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4 The proposed development and its effect

- 4.1 This section of the report describes the proposed scheme for the site of Nos. 18-21 & 22-23 Hand Court and its effect on the heritage significance and townscape character described in the previous section.
- 4.2 The proposed scheme is illustrated in the drawings and Design & Access Statement prepared by Buckley Gray Yeoman.
- 4.3 A summary of townscape and heritage effects is provided in this section. A detailed assessment of the townscape and heritage effects of the proposed scheme in a series of townscape view is provided in the next section of this report. This section should be read with the next section of the report.

Background

Previous planning applications

4.4 In 2007 two schemes for the comprehensive redevelopment of the High Holborn Estate site were dismissed at appeal. These schemes identified the buildings which were of heritage significance and established the parameters of what would be acceptable in planning terms, mainly in relation to uses, height, the massing of buildings, and what constituted an acceptable effect on the Bloomsbury Conservation Area. The appeal schemes led to a successful planning application for a comprehensive office-led development that was granted planning permission in July 2009. That permission was subject to minor material amendments which were approved in October 2011 (reference: 2010/5725/P). Planning permission was sought in 2012 for the renewal of planning permission granted in July 2009. The application was the subject of a resolution to grant planning permission in February 2013, but the applicant decided not to complete the \$106 Agreement and

- therefore the planning application was formally withdrawn.
- 4.5 More recently, planning permission and listed building consent was granted for the change of use at 46, 47, 47a & 48 Bedford Row from office to residential to provide 5 units and the demolition of rear extensions.

Pre-application discussions

- 4.6 The proposed scheme has been the subject of extensive pre-application discussions with the London Borough of Camden. Discussions with the Council occurred in July 2016, February 2017, June 2017, August 2017, May 2018 and August 2018. Proposals were shown to Camden's Design Review Panel in August 2017 and July 2018. These discussions resulted in the significant change to the design of the proposed scheme over a two year period.
- 4.7 The Design & Access Statement describes the evolution of design proposals that occurred in order to arrive at what is now proposed.

The proposed scheme

18-21 Hand Court

- 4.8 It is proposed to replace the existing three storey office building at 18-21 Hand Court with a new modern five storey office building (ground, basement plus 4 upper levels). The ground floor will contain retail units (also located at basement level), the office entrance, a service entrance and a electricity substation. The fourth floor is set back, with a terrace overlooking Hand Court below. Plant will be located at roof (along with photovoltaic panels) and basement levels.
- 4.9 The building to Hand Court is expressed as a series of vertically-emphasised bays separated by brick piers with stepped brick reveals and soldier course brick soffits and cills. Scalloped brick spandrels mark the floor levels, and this curvature is also expressed in the parapet at fourth floor and the shallow arches at ground floor. Each window bay consists of an uninterrupted fully height

glazing unit. The ground floor is organised into wider bays, the width of four bays in the office floors above, and have bronze framed glazed shop fronts. The office entrance has stepped reveals and soffit, echoing the elevation above.

22-23 Hand Court

- 4.10 The proposal for 22-23 Hand Court seeks to change the existing use from office (B1) to retail (A1/A3) at ground and basement level only, in addition to some modifications to the front elevation along Hand Court to improve the frontage for retail and provide independent access for the existing first floor office unit. The façade to Hand Court is retained and refurbished, save for the removal of non-original shop fronts.
- 4.11 The proposed new shop fronts will enlarge the amount of glazing and thus the visibility and viability of the retail units. The design of the new shop fronts will be respectful and entirely in keeping with the character and appearance of the host building, made of traditional materials (wood and glass) and detailed appropriately.



Figure 13: the proposed scheme - 18-21 Hand Court is on the right, 22-23 Hand Court on the left (image © Buckley Gray Yeoman, 2018)

Effect on heritage significance and townscape character

18-21 Hand Court

4.12 The proposed scheme for 18-21 Hand Court will create a new active frontage on Hand Court, helping to enliven this moribund space. The scale and proportions of the design relate directly to the immediate context – the set-

- back at fourth floor respects the scale of 22-23 Hand Court. In overall terms, the proposed building improves on the present situation it replaces the squat, unsatisfactory and altered existing building with a new development that respects the townscape quality of the 'court' while assuming a more appropriate scale.
- 4.13 The proposal is a high-quality design it is a simple, elegant and straightforward proposal whose quality derives from adopting an appropriately muted level of architectural expression, using a modest palette of traditional materials to create a crisp and contemporary project. The combination of appropriate scale and the quality of its design causes the scheme to fit very well into its context.

22-23 Hand Court

4.14 The contribution made by 22-23 Hand Court to the Bloomsbury Conservation Area lies in principally its façade to Hand Court, and this will be preserved and enhanced in the proposed scheme. The scheme will secure the building for the long term in its optimum viable use, and a key to achieving this is the careful opening up of the ground floor frontage.

Conclusion

- 4.15 The proposed schemes for 18-21 Hand Court and 22-23 Hand Court respect the existing built form and urban grain of the area. The new building at 18-21 Hand Court is a respectful and high quality piece of modern architecture.
- 4.16 In addition to the benefits of the design in architectural and urban terms, the proposed scheme also delivers more general planning benefits. In summary, these are:
 - The scheme for 18-21 Hand Court provides a high quality new office building that serves the core Central London market, with modern, attractive and flexible office accommodation.

- The scheme will provide a greater number of uses, adding increased life and vitality to the site as well as its surroundings;
- The scheme enlivens the ground level street frontages with active uses; this enhances the pedestrian experience of the site and the area, making the use of the streets around the site a safer and more pleasant experience;
- The scheme creates (in 22-23 Hand Court) an upper floor, twenty-four hour, residential use that ensures that life and activity - and the security and place-making that they bring - continues around the clock.
- 4.17 The overall set of proposals for Hand Court are highly positive in many ways. We conclude that both schemes for 18-21 Hand Court and 22-23 Hand Court will preserve and enhance the Bloomsbury Conservation Area, the setting of nearby listed and locally listed buildings, and will have no effect on the registered landscape. The rationale for this conclusion is developed further in the next section

5 Townscape, heritage and visual impact assessment

Introduction

- 5.1 This section of the report assesses X townscape views of the site, analysing the as-existing situation and what is proposed.
- 5.2 The photography and visualisation work was undertaken by AVR London. The majority of the views illustrate the proposed scheme in wire line; five images are rendered. An explanation of the methodology for the production of an Accurate Visual Representation (AVR) is provided with the application, along with larger-scale images. The location of the selected view points is shown in Figure 14 below. The photographs here are at a small scale; this section of the report should be read with the larger images.
- 5.3 In each view, the existing situation is described and the proposed development is then shown and assessed as proposed in isolation, and in terms of the cumulative effect of the scheme with other proposed developments.
- 5.4 The text below should be read in conjunction with the analysis contained in Sections 4 and 6.
- 5.5 The commentary should be read as a whole. Certain descriptions are not repeated where the same townscape or heritage characteristics or features appear more than once in the views, and the text cross-refers to other views.

Assessment methodology

An analysis of the area around the site has been undertaken to understand the impact the development is likely to have on key heritage and townscape features and heritage assets. This includes: urban form, character and architectural quality, the presence of heritage assets, scale and massing, public realm, permeability and linkages, continuity and enclosure.

- 5.7 A combination of desktop study and fieldwork has been used to determine the significant views of the development.
- 5.8 After initial desktop work and fieldwork, key representative viewpoints has been subject to verified photomontage simulations to enable an accurate assessment of the visual impact of the buildings on an existing view. In this report, the assessment of the impact of the proposals on townscape and heritage significance is focussed principally on an assessment of the wirelines.
- 5.9 Given the nature of the proposals, the scope of the assessment has had regard to Historic England guidance on the setting of heritage assets and tall buildings.

Impact criteria

- 5.10 The magnitude of change to townscape and heritage receptors is measured as follows:
 - 'Negligible' no material change;
 - 'Minor' changes that only make a small difference to the ability to understand and appreciate the historic context or townscape setting. A minor impact may also be defined as involving receptors of low sensitivity exposed to intrusion, obstruction or change of a low to medium magnitudes for short periods of time.
 - 'Moderate' a change that makes an appreciable difference to the ability to understand the historic context or townscape setting. A moderate impact may also be defined as the result of moderately sensitive receptors exposed to intrusion, obstruction or change of a medium magnitude, or highly sensitive receptors exposed to intrusion or change of a low magnitude.
 - 'Major' a fundamental change in the appreciation of the resource and historic context or townscape

setting. A substantial impact may also be defined as the result of highly sensitive receptors exposed to intrusion, obstruction or change of a high or medium magnitude for prolonged periods.

- 5.11 The impact of proposals on townscape receptors is measured as follows:
 - 'Neutral': there is negligible or no impact;
 - 'Beneficial': the impact of the development is to improve the condition or circumstances of the townscape receptor
 - 'Adverse': the impact of the development is to harm the condition or circumstances of the townscape receptor.

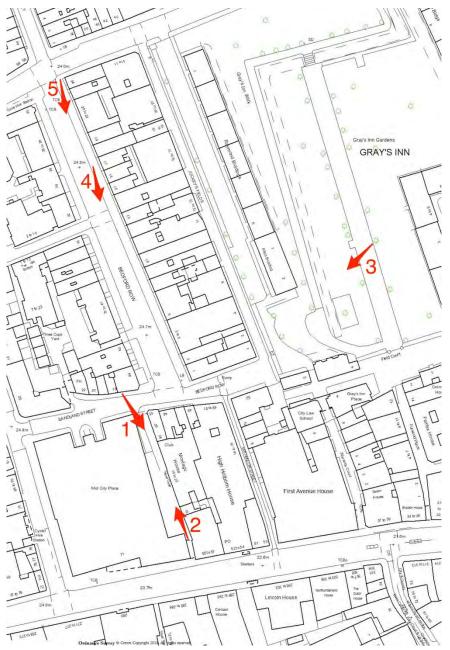
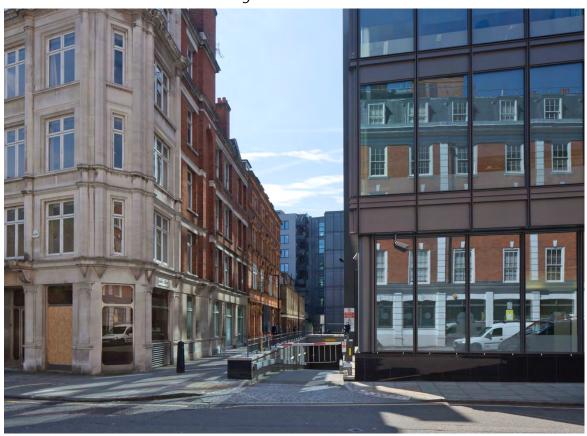


Figure 14: Townscape view points

View 1: Looking south along Hand Court from Bedford Row

Existing

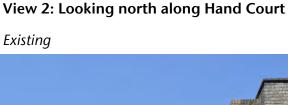


5.12 This view (as with all others) is from within the Bloomsbury Conservation Area. The unlisted 45 Bedford Row is on the far left, and 24-25 Hand Court is the red brick building to its right. 22-23 Hand Court is beyond, and the low form of 18-21 Hand Court leads the eye towards the narrow opening at the southern end of Hand Court onto High Holborn. Above this opening on the left is 55-57 High Holborn. The large bulk of Mid City Place occupies the right hand side of the view and also extends above the opening at the southern end of Hand Court.



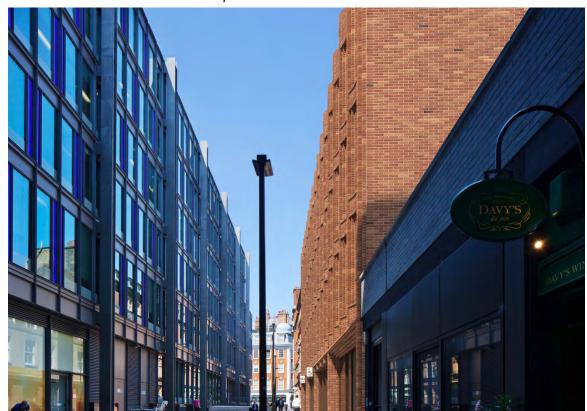
Proposed

- 5.13 The proposed view shows the refurbished façade of 22-23 Hand Court with the proposed redevelopment of 18-21 Hand Court beyond. The scale of the new building is seen as entirely consistent with the eastern side of Hand Court, the parapet of the main elevation aligning with that of 22-23 Hand Court and buildings to the north, and the setback fourth floor is minimally visible, seen in the same way as the chimneys and dormers of the older buildings to the north. The proposed development fills the gap of 18-21 Hand Court, obscuring the unremarkable modern rear elevation of 55-57 High Holborn.
- 5.14 The magnitude of change in townscape terms is *Moderate*, and the effect is assessed as *Beneficial*. The setting of the heritage assets and townscape character is altered to a significant degree, but in a positive way.



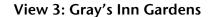


5.15 This view looks north along Hand Court. The lower rear part of 55-57 High Holborn (Davy's Wine Bar) is on the right with 18-21 and 22-23 Hand Court beyond, seen obliquely. The impervious and inactive ground floor frontage on the eastern (right hand) side of Hand Court is clear in this view. Mid City Place dominates the left hand side of the view. Bedford Row is seen in the distance; the building that is visible (44 Bedford Row) is not listed.



Proposed

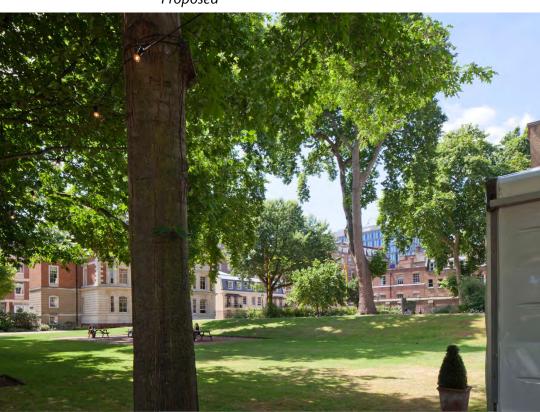
- 5.16 This view shows the positive effect that the proposed development of 18-21 Hand Court will have in addressing the over-dominant effect of Mid City Place with a taller building on the site on the eastern side of Hand Court. The proposals will re-balance the proportions of Hand Court, providing a better sense of enclosure and a more legible space. The brick materiality of the proposed scheme will offer a warm, contextual and more humane contrast to the metal and glass of the large office building opposite.
- 5.17 The magnitude of change in townscape terms is *Major*, and the effect is assessed as *Beneficial*. The setting of the heritage assets and townscape character is altered to a very significant degree, but in a positive way.



Existing



5.18 This view is of very high heritage and townscape significance. It looks towards the site from the Grade II* registered landscape of Gray's Inn Gardens. Raymond Buildings (listed Grade II) is just seen on the right and in the right middle distance are the rear parts of the Grade II listed 1-7 Bedford Row, with Mid City Place rises above. The Grade II 5 Field Court (with slate mansard) is to its left



Proposed

- 5.19 The proposed development, indicated by a dotted yellow wire line (see detailed image below) will not be seen from this view point, as it is hidden by intervening built form.
- 5.20 The magnitude of change in townscape terms is clearly *Negligible*, and the effect is assessed as *Neutral*. The setting of the heritage assets in the view is left unchanged. There is no change in townscape character.



Detail of proposed View 3



Existing



5.21 This view looks south along Bedford Row towards the east-west section of the street at its southern end, from a position on the pavement outside 1 Bedford Row. The Grade II buildings at 46, 47, 47A and 48 Bedford Row are visible in the distance. The entrance to Princeton Street is on the right. All the buildings on the left of the view are listed either Grade II or Grade II*; all except 37-41 Bedford Row on the right are listed Grade II. Mid City Place can be seen above the buildings on the left. The site is beyond 46, 47, 47A and 48 Bedford Row.





- 5.22 The proposed view indicates that a very small portion of the proposed development at 18-21 Hand Court *may* be visible above the listed buildings at 46 and 47 Bedford Row, though the proposed building is positioned behind the large mature street tree in the centre of the view at the end of Bedford Row and will effectively be invisible. If possible to see the proposed building, the view would be of the short northern elevation, its brick blending with that of its immediate context. Far more evident in this view is the broader family of taller buildings that line both sides of High Holborn, signalling the presence and location of that busy main thoroughfare from within the Bloomsbury Conservation Area the proposed scheme for Hand Court will sit below this higher datum.
- 5.23 The magnitude of change in townscape terms is *Minor*, and the effect is assessed as *Beneficial*. The setting of the

heritage assets and townscape character is altered to a very limited degree.



Detail of proposed View 4

View 5: Looking south along Bedford Row from Theobald's Road

Existing



5.24 This view is from a position approximately fifty metres to the north of View 4, looking in the same direction. While the majority of buildings in the view are listed either Grade II or Grade II*, Nos 19-22 on the left and Nos 26-28 on the right are not. The site is located behind the trees and buildings at the end of the view.





- 5.25 The proposed development will, effectively, be invisible in this view, hidden by intervening built form and mature street trees – which, even in a winter condition, would screen the southern end of Bedford Row. Distance from the view point reduces further the degree of change in the view.
- 5.26 The magnitude of change in townscape terms is Negligible, and the effect is assessed as Neutral. The setting of the heritage assets in the view is left unchanged. There is no change in townscape character.



Detail of proposed View 5

6 Compliance with legislation, policy and guidance

6.1 This report has provided a detailed description and analysis of the site and its heritage and townscape context, as required by the National Planning Policy Framework. In addition, the report also describes (in Section 3 'The proposed development and its effect') how the proposed scheme will affect that heritage significance and townscape character. The effect is positive, and for that reason, the scheme complies with policy and quidance. This section should be read with Section 4.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 6.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed scheme preserves and enhances the character and appearance of the Bloomsbury Conservation Area by virtue of the positive effect that the development will have on the setting of the conservation area. The proposed development thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It does not lead to 'substantial' harm or any material level of 'less than substantial' harm to any heritage assets.
- 6.3 In considering the proposed scheme for Hand Court it is worth noting Historic England's online guidance regarding 'Legal Requirements for Listed Building and Other Consents'³⁶. English Heritage points out that 'Most of the principles that should be adhered to when making planning and other consent decisions affecting the historic environment are set out in policy and guidance. However, the law introduces some important and inescapable considerations for certain applications'.

³⁶ http://historicengland.org.uk/advice/hpg/decisionmaking/legalrequirements/

6.4 Historic England continues:

When considering any conservation area consent or planning permission decision that affects a conservation area a local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of that area....

The House of Lords in the South Lakeland case decided that the "statutorily desirable object of preserving the character or appearance of an area is achieved either by a positive contribution to preservation or by development which leaves character or appearance unharmed, that is to say preserved."

A development that merely maintains the status quo, perhaps by replacing a building that detracts from the character and appearance of the conservation area with a similarly detrimental building, would satisfy the statutory consideration. This is notwithstanding that the existing detrimental building presents an opportunity, when it is being redeveloped, to improve the environment.

However, in a number of ways the policies in the NPPF seek positive improvement in conservation areas. Most explicitly paragraphs 126 and 131 require that local planning authorities should take into account "the desirability of new development making a positive contribution to local character and distinctiveness". Paragraph 9 says that pursing "sustainable development involves seeking positive improvements in the quality of the...historic environment...". The design policies further reinforce the objective of enhancement of an area's character and local distinctiveness, concluding that "Permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area..." (paragraph 64).

Compliance with both the statutory consideration and the NPPF policies therefore, generally speaking, requires account to be taken of the desirability of taking opportunities to enhance the character and appearance of a conservation area. As such, whilst the South Lakeland case is still relevant to the interpretation of statute, its effect on decision-making has apparently been negated in this respect by the policies in the NPPF.

- 6.5 The key word in the final paragraph of this extract is 'apparently'. This carefully chosen word makes it abundantly clear that it is far from certain that the South Lakeland decision has been definitively altered by the National Planning Policy Framework. One reason is that it, as a legal decision, cannot be altered without a similar decision or legislation that overturns it policy, even national planning policy guidance, cannot overturn legal decisions such as South Lakeland. Planning decisions are ultimately made in a legal and policy context not just in a policy context alone.
- 6.6 The implication is this: it would be extremely difficult to portray the proposed scheme for Hand Court as doing anything less than maintaining the 'status quo' in heritage and townscape terms and leaving the Bloomsbury Conservation Area unharmed, given the evident shortcomings of what exists on the site and the quality of architectural design that is present in the proposal. In our view, it is far from obvious that a reliable assessment of 'harm' can be convincingly articulated in respect of the proposed scheme. It is obviously possible to make a robust and reliable case for enhancement brought about by the proposed scheme, and that case is made earlier in this report.

The level of 'harm' caused by the proposed scheme to heritage assets

6.7 As outlined in Section 5, the NPPF identifies two levels of potential 'harm' that might be caused to a heritage asset by a development: 'substantial harm...or total loss of

- significance' or 'less than substantial'. Both levels of harm must be caused to a *designated* heritage asset in this case, the Bloomsbury Conservation Area.
- 6.8 The proposed scheme does not lead to 'substantial' harm or any level of 'less than substantial' harm to any designated heritage asset. As has been explained earlier, the proposal does very evidently not result in the 'total loss of significance' of the conservation area or any listed building.
- 6.9 The only potential for 'less than substantial' harm would be if the proposed scheme caused the loss of something central to the special interest of the Bloomsbury Conservation Area or the setting of nearby listed buildings or the Registered Landscape. There is nothing about the proposal that would give rise to this level of harm.

The balance of 'harm' versus benefit

6.10 A series of tangible and distinct public benefits flow from the proposed development – in terms of urban and architectural design, in terms of the character and appearance of the conservation area, in terms of the setting of the designated and undesignated heritage assets and in economic and use terms. These are set out earlier in this report and in the Design & Access Statement. These more than outweigh any very low - and non-material - level of 'harm' that *might* be asserted as being caused by the proposed development.

The National Planning Policy Framework

6.11 The proposed scheme is, undoubtedly, a very good example of the 'outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings' that is sought by Paragraph 131 of the NPPF.

- 6.12 In respect of Paragraph 185 of the NPPF, the proposed scheme can therefore certainly be described as 'sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'. It preserves the 'positive contribution' that the relevant heritage assets make to their surroundings, and it preserves and enhances their special architectural or historic interest.
- 6.13 The proposed scheme complies with Paragraph 195 of the NPPF it certainly does not lead to 'substantial harm to or total loss of significance of a designated heritage asset'. It also complies with Paragraph 196 for the reasons given in detail earlier in this report the scheme cannot be considered to harm the conservation area or the setting of listed buildings, but rather alters heritage assets and their setting in such a way that the net effect of such change is positive, for the reasons given earlier.
- 6.14 Any 'less than substantial harm to the significance of a designated heritage asset' (Paragraph 196) if any that can be ascribed to the scheme is outweighed by the multiple benefits flowing from the scheme: the exceptional quality of the architectural design, the creation of employment space, the creation of active frontages within the development, the enhancement of its public realm, the provision of new local facilities, and so on, and as discussed in this report, the Design & Access Statement and the planning statement.
- 6.15 The scheme very definitely strikes the balance suggested by Paragraph 196 of the NPPF it intervenes in the setting of heritage assets in a manner commensurate to their heritage significance. This balance of intervention versus significance is described in detail earlier.

The London Plan

6.16 The proposed scheme for the High Holborn Estate site is exactly what the London Plan envisages when it talks (in Policy 7.4) about developments having 'regard to the form, function and structure of an area, place or street

- and the scale, mass and orientation of surrounding buildings'. The design of the proposed scheme is inherently responsive to these things, and it is designed to minimise its impact on the context in which it finds itself. It inherently 'allows existing buildings and structures that make a positive contribution to the character of a place, to influence the future character of the area'.
- 6.17 By responding as it does to its location, the scheme will build on 'the positive elements that can contribute to establishing a character for the future function of the area'. The massing and scale of the proposed scheme undoubtedly 'has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass', and does so with 'a high quality design response'. The proposed development is certainly 'human in scale', related as is shown earlier, to traditional means of scaling the elevations of buildings in cities. It is of 'the highest architectural quality' and includes 'details and materials that complement... the local architectural character'. The scheme thus complies with Policies 7.4 and 7.6.
- 6.18 The proposed scheme transforms the Hand Court site from its present state, and in so doing adds life and vitality to the broader context in which heritage assets around it exist. The scheme clearly by not affecting them in direct visual terms 'conserve[s] the significance of heritage assets'. For these reasons, the scheme is consistent with Policy 7.8 of the London Plan.
- 6.19 It is also consistent with Policy 7.9 of the Plan the 'significance' of the heritage assets in the context of Hand Court and the High Holborn Estate site has been 'assessed'

Camden's Local Plan

6.20 As has been shown, and for the same reasons that are given in respect of the NPPF, the scheme would provide new buildings that would make a positive contribution to the surrounding townscape and also preserve *and*

- *enhance* the character and appearance of the conservation area and the setting of listed structures.
- 6.21 For these reasons, and those given earlier, the proposed development is consistent with Camden's Local Development Framework policies regarding demolition and new development in conservation areas, and in particular, Policy D2. which deals with Camden's heritage assets.

Historic England guidance on the setting of heritage assets

- 6.22 The step-by-step methodology provided in Historic England's Historic Environment Good Practice Advice in Planning Note 3 is addressed as follows:
 - Step 1: identify which heritage assets and their settings are affected:
 - This is done in Section 2 of this report and in the Visual Impact Assessment contained in Section 5.
 - Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s):
 - This is discussed in Sections 2 and 5 of this report
 - Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance:
 - This is undertaken in Sections 4 and 5 of the report
 - Step 4: explore the way to maximise enhancement and avoid or minimise harm:
 - This formed part of the design process and preapplication discussions with the local planning authority, and the design has evolved to respond to pre-application advice.
 - Step 5: make and document the decision and monitor outcomes:
 - The submission documents, in particular the Design & Access Statement, and this report record

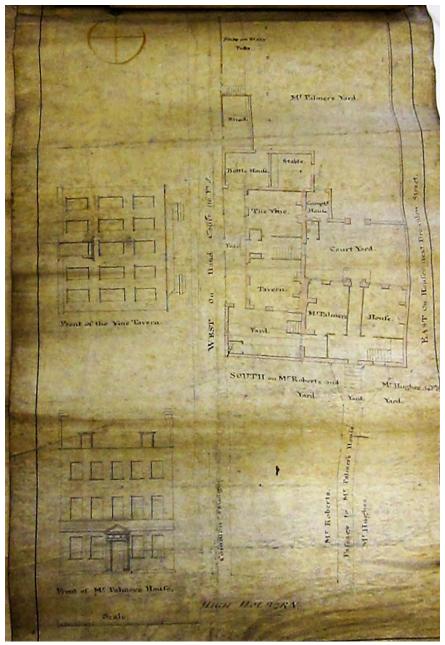
the scheme as amended following design development prior to an application for planning permission being made.

7 Summary and conclusion

- 7.1 Hand Court and the High Holborn Estate are typical of many central London commercial locations. Despite many older buildings having been replaced by later development the area retains a good degree of its earlier character. The site and its surroundings clearly forms part of an urban context that is characterised by the layout of pre-20th century streets and alleyways and by large numbers of older buildings and spaces many of which are designated heritage or non-designated heritage assets. Hand Court is located in an area of high townscape and heritage significance.
- 7.2 There is a significant opportunity to create a more interesting and vibrant environment in Hand Court that improves the architectural quality of the High Holborn Estate, preserves and enhances townscape and heritage significance and that links well to the surrounding cityscape. That is what the proposed scheme for Hand Court will do.
- 7.3 The proposed schemes for 18-21 Hand Court and 22-23 Hand Court respect the existing built form and urban grain of the area. The new building at 18-21 Hand Court is a respectful and high quality piece of modern architecture. The overall scheme will enhance both the setting of listed and locally buildings in the vicinity as well as the character and appearance of this part of the Bloomsbury Conservation Area. The effect on heritage assets and townscape further afield will be, where the development is visible, lesser but still positive. The proposals generate a considerable number of architectural, urban design, heritage and planning benefits.
- 7.4 For these reasons, the proposed scheme will therefore comply with the law and with national and local policies and guidance for urban design and the historic built environment.

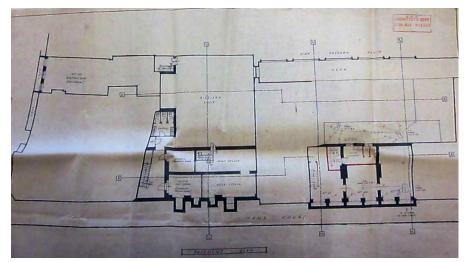
Nos. 18-23 Hand Court, High Holborn Estate, London WC1 Townscape, Heritage And Visual Impact Assessment

Appendix A: Premises in Hand Court, hand drawn plan, mid-19th century

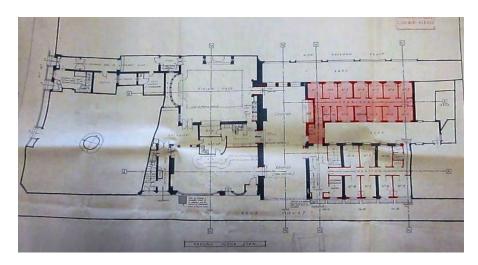


Source: © London Metropolitan Archives CLC/275/MS33303

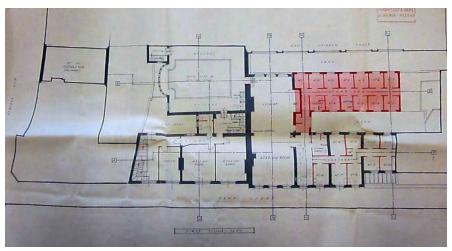
Appendix B: Architectural drawings: Alterations and additions to Nos. 19-23 Hand Court for the Veterans' Club (1934)



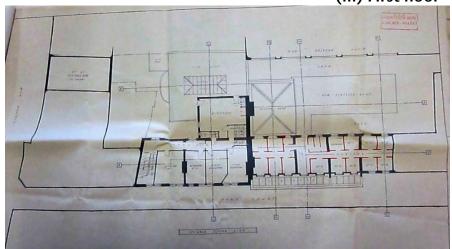
(i) Basement



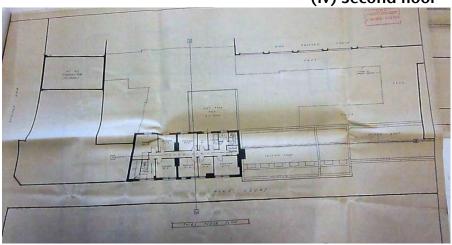
(ii) Ground floor



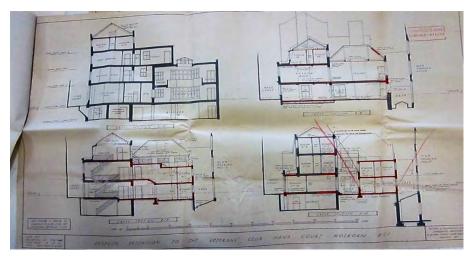
(iii) First floor



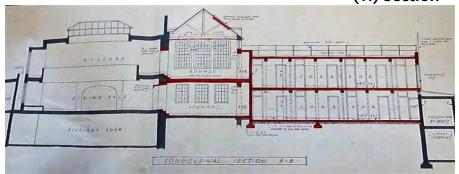
(iv) Second floor



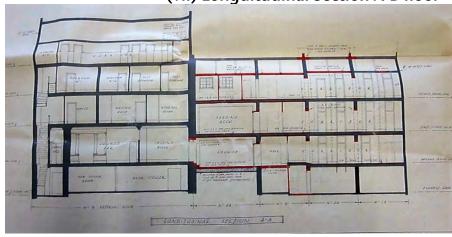
(v) Third floor



(vi) Section



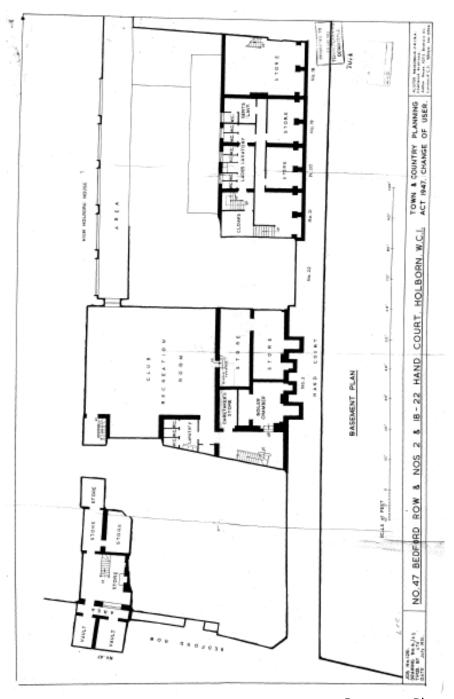
(vii) Longditudinal Section A-B floor



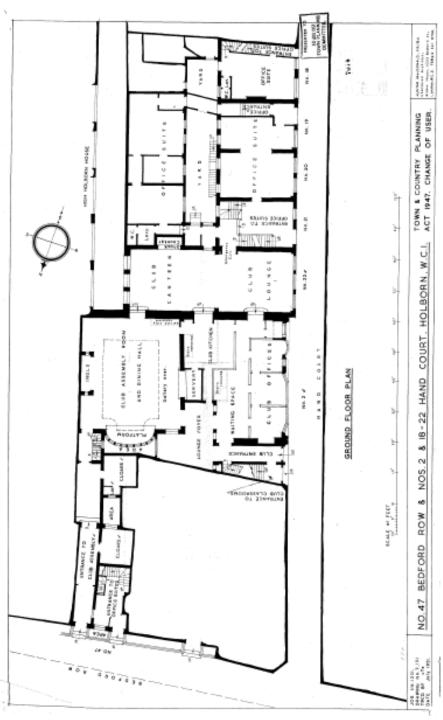
(vii) Longditudinal Section A-A

Source: © LMA GLC/AR/BR/06/059968

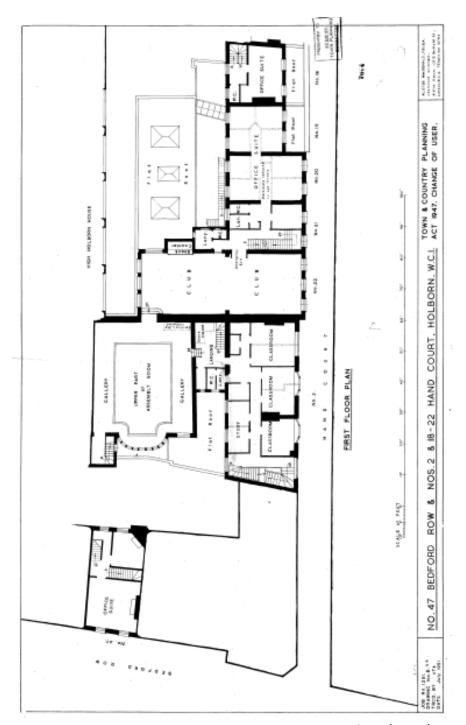
Appendix C: Plans - No. 47 Bedford Row & Nos. 2 and 18-22 Hand Court, 1951



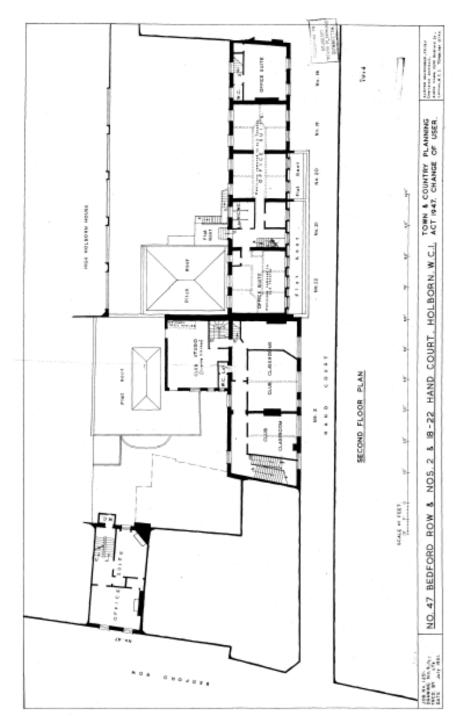
Basement Plan



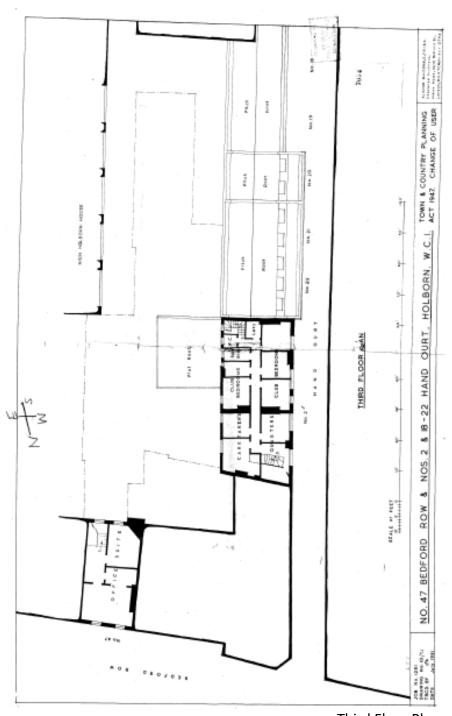
Ground Floor Plan



First Floor Plan



Second Floor Plan



Third Floor Plan

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