



**BLOOMSBURY
ASSOCIATION**

33 BEDFORD AVENUE
LONDON WC1B 3DP

PROPOSAL: Internal alterations, including reconfiguration of the internal spaces, replacement of the floors and the installation of underfloor heating

Application for listed building consent: 2020/4121/L

25 October 2020

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

1. Heritage Statement

We disagree with the conclusions of the accompanying Heritage Statement prepared for Resource Interiors by Alfie Temple Stroud.

Section 3.2.1, *Special interest of the listed building*, states: "33 Bedford Avenue's architectural interest is entirely vested in its 1890s red-brick street frontage, which is raised over a basement, and is consistent with the rest of the rebuilt mews row in its idiosyncratic elevational composition, decorative brickwork and stone dressings... The building behind the facade is of very modest architectural interest, mainly only for its form as a building of approximate mews scale – though this has anyway been greatly distorted in plan and height – and position in relation to the main house – that is, its subordinacy, scale and basic arrangement as an ancillary building..."

... In summary, No. 33's special interest is very limited, partly merely a memory no longer vested in its fabric or else speculative, and otherwise wholly associated with its 1890s façade."

Section 3.2.2, *Positive contribution to the conservation area*, goes on to say: "The essential character of the Bloomsbury Conservation Area is that of its first phase of Georgian semi-urban co-ordinated elite residential development, of which Bedford Square – though not the reconstructed fabric of Bedford Avenue – is without question the pre-eminent specimen. To this aspect of character, the Bedford Avenue buildings contribute by marking the urban arrangement of the ancillary mews house that was integral to the large terraces of this phase of development. In fabric, form and appearance, however, it contributes nothing. The conservation area's phases of Victorian and Edwardian commercial and residential intensification, and its finest twentieth-century redevelopments, are also important aspects of its character, and No. 33 Bedford Avenue makes a positive contribution to the first of these through its part in the composition of the striking 1890s façade. This is almost all of the building that is visible from the public realm, and is also the limit of its positive contribution, to which nothing is added in character or appearance by the modern fabric behind."

Then Section 4.3, *Summary justification*, concludes: "In general, behind the 1890s façade, No. 33 has been comprehensively rebuilt and altered, and its contribution to the special interest of the listed building apart from this façade is by loosely recalling a typical formal relationship of the house with its lost mews. Its internal plan form contributes no special interest, and no fabric or character survives which recalls its predecessors."

There is a common misconception in heritage assessments prepared for several of the buildings on the south side of Bedford Square. All review the research done by their predecessors to reach the same erroneous conclusion that the buildings on the north side of Bedford Avenue are of no particular architectural merit, other than for the fine ornamental, brick and stone screen wall built contemporaneously with Bedford Court Mansions, between 1894 and 1896.

This ignores one vital point. When the freehold of the south side of Bedford Square was sold by Bedford Estates to Abbey Life Assurance in 1970, there was a phased development of all the fabric loosely described as 'mews buildings' behind the ornamental facade to Bedford Avenue. At the time all were intended for office use and existing office plans accompany earlier planning applications for 52 Bedford Square. The intention was that, as conditions changed in the longer term, they could revert back to residential use.

As the Statement acknowledges, the design was undertaken by Ellis Clarke & Gallenough, the first phase of which (numbers 41, 42, 47, 48 and 53 Bedford Square) earned a Civic Trust Award in 1975.¹ Further phases followed, including number 33 in the early 1980s. The annual Civic Trust Heritage Year Awards are highly respected and are not usually made to buildings considered to have no architectural merit.

2. Procedurally

The application describes existing and proposed land uses for 33 Bedford Avenue as 'C3 Dwelling House'. The accompanying D&AS states: "The proposal is for the reconfiguration and renovation of internal spaces for improved facilities as a family residence." Previous proposals granted planning permission and listed building consent also refer to creating "a single-family dwelling house". This is misleading. The drawings of the existing and proposed alterations appear to show three self-contained flats, two without kitchens, which suggests more of a hospitality use. The ground and lower-ground floors appear to be a duplex yet no existing or proposed drawings are provided for the lower-ground floor. More clarity on this would be helpful.

The external alterations proposed should be considered through a separate application for planning permission. There might also be a need for a parallel planning application for the reconfiguration of the flats to a single dwelling house and to ensure all Local Plan policies for multi-occupancy are complied with, such as off-street refuse storage.

We are sceptical of the validity of an application being made on behalf of an applicant who appears to be a pseudonym, particularly with regard to the declaration of ownership given in Section 15 of the application form.

The Association does not support this application in its current form for the reasons stated above. Indeed, we are surprised that it was validated. The Council has a duty to safeguard the historic assets in its care and, as planning authority, to be more prudent in its assessment of applications such as this that affect grade I listed buildings.

We would be grateful if you would let us know of any further modification to the application; the decision, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee.

Stephen Heath
On behalf of the Bloomsbury Association

Copies to:

Neil McDonald, London Borough of Camden
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Jennifer Walsh, London Borough of Camden
Jaspreet Chana, London Borough of Camden
Bloomsbury Conservation Area Advisory Committee
Charlotte Street Association
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¹ Heritage Year Awards (Civic Trust, 1975), p.152. Also The Architects' Journal v162 (1975), 87.