

Heritage Statement & Schedule of Work

For Replacement and Minor Alterations to Doors

41 Bedford Square, London WC1B 3HX

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41 Bedford Square

Heritage Statement &

Schedule of Works for Asbestos Remediation to Doors

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1. Introduction

This Heritage Statement has been prepared to inform and accompany a listed building consent application for submission in March 2020 to remediate the discovery of asbestos panels within the existing doors at 41 Bedford Square. No. 41 is part of the Grade-I listed terrace 40-54 Bedford Square, which itself composes the south side of the whole Grade-I listed square and registered garden. The building stands within the Bloomsbury Conservation Area.

The proposals aim to remove the asbestos panels from doors and replace with non-hazardous panels that are similarly non-combustible. Where the asbestos panels cannot be removed safely without irreparable damage to doors, then is proposed to replace these doors whole in an design authentic to its period and location. The work will also provide an opportunity to replace some poor quality modern doors that exist.

This statement is in support of architectural drawings, a door survey and schedule of door work proposals prepared by architects SMOK. Assembly Associates asserts its copyright in respect of this Heritage and Planning Statement which may not be reproduced without their written permission.

The Statement begins with a history of Bedford Square, and of No 41 within it, including an account of its major alterations. These inform a Statement of Significance which follows, describing the site's protected heritage qualities. This is in turn the foundation for the final section, a Heritage Impact Assessment, which looks at the submitted proposals for alteration informed by the foregoing history and significance, and assesses their impact on heritage significance. It concludes with a summary justification taking into account national, London-wide and Camden Council planning policies.

2. History

2.1 Bedford Square and the Bedford Estate

Until the late seventeenth century the area north of Oxford Street, within the parishes of St Marylebone and St Pancras, was largely still in agricultural use. John Rocque's map of 1746 records the first phases of residential development in these areas, following the early-Georgian classical principles of town planning which had been pioneered in London in the mid-seventeenth century first in Francis Russell, 4th Earl of Bedford's Covent Garden piazza, and then in Nicholas Barbon's squares and terraces around Covent Garden and Holborn. These early residential developments were typically speculative, created by the disposal to housebuilders of leases on the lands of aristocratic estates, such as that of the earls of Southampton in most of the area of modern Bloomsbury. The builder-developers replicated across London the standard housing types designed by typically unrecorded architects, adding decorative variations. The new principle of *rus in urbe* brought the pastoral tastes led by the rural aristocracy into the city in the form of the garden square, while post-Palladian architectural styles favoured uniting efficient terraced housing into grand, symmetrical and palatial frontages.

The earls of Southampton initiated development north of Holborn and St Giles, but at the end of the seventeenth century, their lands passed by marriage into the Russell family, by then raised to the rank of dukes of Bedford. A lull in residential expansion in the early eighteenth century stalled the suburban development of Bloomsbury, but by the latter part of the century, conditions were right for John Russell, the 4th duke, to pursue an ambitious, prestigious extension of the area. The duke

died in 1771, but his wife, the dowager duchess Gertrude, and the estate surveyor, Robert Palmer, began development of Bedford Square in about 1775. The involvement of William Scott, a brickmaker, and Robert Grews, a carpenter, is recorded, and Thomas Leverton, a distinguished architect of country houses and particularly noted for his delicate decorative interiors, who later lived at 13 Bedford Square, is known to have been involved in the design of some. Despite the speculative nature of the square's development, and its phasing over almost a decade, and the apparent lack of a single overseeing architect, the square was realised with a high degree of architectural uniformity and as a holistic design. This reached a degree not previously achieved elsewhere in London, expressive of the new tastes of the late eighteenth century and a testament to the town planning vision and contractual expertise of the Bedford Estate.

Bedford Square proved a great success and remained a mainly residential square until the late Victorian period, despite the commercial conversion and development of other Georgian residential streets to the west around Tottenham Court Road. Its design proved influential in the style and garden square layouts of later residential squares to the north in Bloomsbury, especially those on the Bedford Estate itself. Some of the striking uniformity was achieved through the use of standardised manufactured Coade-stone dressings and elements such as doorcases. Sir Nikolaus Pevsner has remarked upon some of the idiosyncrasies of the architectural design which fail to follow formal classical principles and hint at the square's pragmatic, developer-led character. The detailed architecture of the square – which is essentially a modest development of the Palladian principles popularised by the Adam brothers half a century before – was in this sense less pioneering than the manner of its planning and construction. Pevsner notes:

"Each side of the square is treated as a whole, with stuccoes, pedimented and pilastered fivebay centre. The houses have entrances with window slits flanking the doors so as to make a tripartite pattern, and surrounds of Coade-stone with intermittent vermiculated rustication and bearded faces on the keystones."

Grews and Scott completed each house as a shell based on their agreement with the Bedford Estate, before internal finishes were carried out under the patronage of the final purchaser of the plot. Notwithstanding decorative variations, facades match in their elongated windows at the first, principal floor, with cast iron decorative balconies. The consistent plot widths typically generated largely uniform plans, with the greatest variations only in the more notable addresses such as Leverton's No. 1. The houses all have basements extending to an excavation front area, railed at street level, and rose with timber studwork walls to a roof of two pitches parallel to the front façade. Within, only the staircase compartment was constructed in masonry, to allow for the stone staircases to be cantilevered from it. Many of the houses contained decorative plaster or even painted ceilings, completed presumably under the patronage of the first purchasers, on at least the first floor.

In the 1890s, the row of mews buildings on Bedford Avenue which served the main houses in ancillary uses such as stabling and storage, were entirely reconstructed (Pevsner and Cherry, 1998, p. 323). The original mews buildings, which presumably resembled the surviving cottages connected to residential terraces of comparable age and status in Bloomsbury and Marylebone, but are little recorded except in plan, were replaced with the highly consistent red-brick-faced range on annexes, which survives today. Each annex plot has a matching façade arrangement of front door providing access independent from the Bedford Square houses, and a sash window to raised-ground level over a basement beneath. The façade has a strong, long, low parapet line, concealing a mansard behind. The façade is relieved with relief diaper patterning, and terracotta and stone detailing.

2.2 No. 41 Bedford Square

No. 41 stands on the south-side range of Bedford Square, near the street that connects the square to Bedford Avenue. It is 26ft. (8m) wide and 130 ft. (40m) deep. Andrew Byrne's archival research (1990, p.151) shows that it was first leased by the Estate in November 1777 for 99 years to the bricklayer-developer, William Scott, for an annual ground rent of £6, which Scott further subleased, 21 days later, to the carpenter, Robert Grews. Their arrangement involved a peppercorn rent for the first four years, followed by a ground rent of £18 4s. The house was already completed in 1779.

A complicated history of the completed building's occupation survives from multiple sources. Byrne identifies the first resident as Mr Serjeant Glynn, a Cornish politician and lawyer – occupations typical of the Square's early residents, because of proximity to both Westminster and the Inns. Glynn was an MP and Recorder of London while a resident, but his occupation was short lived, and he died at the house in September 1779. His tenancy was followed by that of William Lushington (to 1781), then a series of barristers: Robert Peers (to 1819); Richard Richards, also a Welsh MP (to 1843); and William Rogers (until 1861). During their occupation, some other names are recorded against the property in Camden Archives: Sir John Bayley, a judge, was in residence 1820-29; and both John Gregory and Henry Hodgson in 1853. These multiple residents may record a complicated history of sub-leases. Commercial occupations seem to have given tenants their livelihoods from the second half of the nineteenth century, including John Woolf, a stockbroker (resident 1865-84). A series of short tenancies in the 1880s and 90s include a period of vacancy in 1896, before a patent agent, Dugald Clerk, took up residence in 1897, remaining until at least 1902. As recorded by the blue plague on the front of the house, Sir Anthony Hope Hawkins, the novelist, lived in the house from 1903 until 1917. After this point, the history of the house's residents is less clear, but major alterations recorded to 11 Bedford Avenue and the shared yard suggest the arrival of non-domestic uses, and by the 1960s, the house seems to have been in use as a school. No. 41's transition from prestigious residence of lawyers and politicians, to less stable society tenancies first of the rich and then of artists, before its acquisition by commercial demands, seems fairly typical of its Bedford Square neighbours.

Presumably meeting the wishes of Glynn, No. 41 received decorative plaster-moulded ceilings and fireplaces made by an unrecorded craftsman. These are depicted in photographs kept at the London metropolitan archives some still surviving today.

2.3 Historical Alterations

The following account of the history of No. 41, record the surviving plans for past phases of alteration of No. 41, from the late nineteenth-century until the late twentieth-century. The plans are archived on microfiche at Camden Local Studies Library. Summary descriptions of the works are provided.

No archival records survive relating to No. 41 prior to 1896, when a drainage application was associated with plans by Langdale Hallett & Co. of Brompton Road for the installation of new gulleys, soil and wastewater pipes in the basement of the house, including a six-inch stoneware pipe. A new WC appears to have been installed at this time on the ground floor or above within the closet-wing, at the rear of the main stairs. At this date, there appears to have been no connecting corridor to the new annex building at either basement or ground level. The plans were approved.

No plans above basement-floor were provided so the extant condition of the house at the end of the nineteenth century is not otherwise recorded. From the early twentieth century, a series of major

alterations were made to the associated annex building, 11 Bedford Avenue, and to the yard between the two buildings. This period of alterations suggests an intensification of commercial activities in the square and its surroundings, as practical needs began to dynamically reshape the uses and form of the originally domestic buildings.

In 1909, an application for further alterations to drainage submitted by James Smith & Sons of South Norwood appended a set of plans apparently associated with the partial or total reconstruction of the rear annex building behind the 1890s Bedford Avenue façade, and connecting link at this time. No clear elevations survive in association with the early applications, so it is difficult to assess the change in form and character that came with the reconstruction.

Smith & Sons' plans show a large, top-lit room at ground-floor level in the annex building, with a decorative fireplace located on the yard-side wall, is labelled 'New Billiard Room'. Beneath this, with yard-wall masonry containing two corner chimney breasts possibly retained from a pre-existing structure, are two bedrooms. These alterations seem to have amounted to a residential extension of the main house, perhaps providing more guest or service facilities for the tenant, Sir Anthony Hope Hawkins. The plans appear to distinguish between two sets of additions: those for the annex building itself (which was probably already in place but newly-built) and, significantly, those for addition of a narrow linking corridor structure running along the party wall with no. 42 between No. 11 and the rear closet wing of the house. Thus, a link structure between No. 41 and its Bedford Avenue annex has only been in place since 1909. Elevations show this first link to have been brick-faced with sash windows. A new WC was constructed at basement level at this time by creating a dogleg in the rear connecting corridor and extending the existing closet wing with a corner projecting into the yard. Elevation drawings are badly reproduced in the identified microfiche, but record proposed internal elevations to the yard with a mixture of flat-gauged and arched brick lintels to multi- and single-pane sash windows within walls of facing brickwork over two storeys.

In 1914, Bedford Square was surveyed and described in detail as part of the Survey of London, of which Volume 5 covered the second, northern part of the Parish of St. Giles-in-the-Fields. A valuable description of No. 41 at this time appears as follows:

"The premises have been considerably modernized, but four chimneypieces remain, that in the front room on the ground floor being Greek in character, with panelled pilasters and acanthus capitals. The one in the rear room on the same floor is treated with three-quarter lonic columns carrying the cornice directly over, to which a shelf of later date has been added."

"On the first floor, the chimneypiece in the front room (Plate 95) has coupled and bracketed pilasters and sculptured frieze. That in the rear room (Plate 95) is inlaid with mottled green marble. It retains the original cast-iron grate. The ornamental plaster ceiling in this room has four oval plaques in square panels. According to Mr Anthony Hope Hawkins, the present occupier, it is composed partly of old portions of a ceiling formerly in No. 30 or No. 31, Bedford Square, the remaining part being a copy of a ceiling still existing in one of these houses. The ceiling appears to be replica of that in the rear room if No. 31 (Plate 88), with the exception that it is of less width, and consequently the central design, instead of being circular, is compressed into an oval form."

The accompanying images are reproduced in Appendix B.

In 1927 G.E. Wallis & Son of Old Cavendish Street, N1, submitted an approved drainage application for No. 41 on behalf of Messrs. Elles-Hill & Co. The microfiche reproductions are difficult to read, but the associated works relate to the extension of the above-mentioned 1909 WC with a further, separate WC at ground-floor level, adjoining the connecting passage in the rear yard. Plans and

elevations record an existing escape stair standing perpendicular to the connecting passage to give access into the stair, and propose support of the new WC at ground-floor level on a stanchion to basement level to form an undercroft beneath, with modification of the yard elevation of the passage by blocking-up of a sash window and formation of a new smaller light. The existence of this peculiar arrangement in the rear yard, with oversailing ground-floor WC and stanchion prop, is confirmed by a photograph of the yard in 1973 contained in the London Metropolitan Archives (ref: 70281, Appendix B). More pertinent to the main areas of heritage significance in the house, the Wallis & Son plans include a full ground-floor plan, with an accompanying note than an existing doorway adjacent to the main front door, from the entrance hall into the front room – certainly a non-original position – was to be closed up.

Bedford Square was added in its entirety to the National Heritage List for England in 1951, meaning that from this date, comprehensive drawings and permissions for all alterations were required, both in association with the provision of the 1948 Town Planning Act, but also in order to gain approval from national and local heritage bodies.

Hall Beddall & Co Ltd of Waterloo Bridge submitted an approved drainage application in 1955 for partition of an existing WC on the first-floor landing in the pre-existing closet wing structure by addition of a wall, lavatory basins and formation of a new doorway to match one existing to its right. Two existing casement windows appear already to have lit the unpartitioned room.

More interestingly for a study of the heritage significance of No. 41, in 1963 Reckitt & Sons of Hull submitted a drainage application for formation of a new bathroom and WC on the third floor of No. 41. Appended plans (again badly reproduced in surviving microfiche) show that No. 40 and No. 41 were at this point laterally connected at several points through the party wall to permit their joint functioning as a girls' school. The plans helpfully record the condition of both Nos. 40 and 41 across all their floors. The alterations to the presumed original plan extant at this date can be presumed to have been made before designation in 1951, and some can be further dated by comparison with plans surviving above.

Regarding No. 41:

- The basement and ground-floor plans show the rear yard, annex and connecting passages at both levels in the condition established by the sequence of works described above, except in that the 1909 billiard room has been laterally partitioned by a light-weight partition wall.
- At ground-floor level, the front room appears to have been formally divided by addition of a partition wall across the rear of the front room to form an enclosed corridor leading off the main hallway and via a doorway in the party wall giving access into No. 40. This partition was added after the plans submitted in 1927 presumably in association with the conversion and lateral connection of the two houses for use as a school. The new partition and corridor made use of the existing and likely original door into the front room off the staircase corridor, which originally discharged into a partially-separated volume at the rear of the front room, without a solid partition but expressed as a volume separate from the main space centred on the chimney breast. From this space there would have been access into the rear room via a central connecting doorway or opening. This sequence of volumes in the original ground-floor arrangement is comparable to those shown in plans for other houses on the (younger) south, east and even north sides of Bedford Square (see: Pevsner & Cherry, 1998, p. 324; Survey of London, 1914, pp. 168 & 181). The plan and section drawings accompanying the 1963 application appear to show a twentieth-century arrangement of

- solid partitions around this space, perhaps with accompanying windows to provide borrowed light, with access still into both front and rear rooms.
- At first-floor level, the equivalent arrangement was at some point made with a lateral
 connection through the party wall and provision of an enclosed corridor within the foremost
 portion of the rear room, abutting the rear chimneybreast. The accompanying sections show
 timber panelled screens with doors, set into the original lateral walls dividing the two rooms,
 corroborated by the plans, which may be original survivals.
- The plans show no further lateral connections above first-floor level, but alterations evident from the presumed original plan include: a cupboard with issue into the room beyond formed around the original doorway off the staircase landing into the rear room on the second floor; and the cupboard, corridor, bathroom and WC which occasioned this 1963 application, formed from the foremost portion of the rear room at third-floor level, largely enclosing the rear chimneybreast. A note records that existing plasterboard was to be removed, and the new walls lined with plaster and expanded metal lathes.
- There was no attic space within the rearmost hipped roof above No. 41, as already existed above No. 40. Rooflights appear to be shown in the ceilings of each of the front rooms at third-floor, but their presumed position in the rear slope of the foremost roof hip of No. 41 is not clear in the roof plan.

A set of 22 photographs, from the interior of No. 41 but some also showing external views, is held at the London Metropolitan Archives. Many of them are erroneously dated 1907. These in fact appear to show the house in a condition corresponding with the above plans from 1963; certainly they predate the alterations recorded in the plans submitted with an application in 1974, described below. A selection of images, useful for supporting this document, are reproduced in Appendix B.

A series of listed building consent and planning applications in the 1960s and 70s are not recorded in drawings deposited at the London Borough of Camden's archives. Details are recorded only in the decision notices containing descriptions of development and the Borough's response. In 1965 Reckitt & Sons submitted a listed building consent application for the erection of three new partition walls — one in the basement of No. 40 and two in the front and rear rooms of the second floor on No. 41. In 1966 the application was partly granted, but refused permission for the subdivisions proposed for No. 41, so no change there is presumed. In 1970 the Borough granted approval to Reckitt & Coleman Products Ltd for "Alterations to 5 existing openings in order to sub-divide the buildings at 40 and 41 Bedford Square, Camden." A plan (HD208) showing the "5 points of access" and a schedule of works were submitted, but have not been located. It may be supposed that the works refer to the blocking-up of the points of access through the party wall which had been made in order to connect the two houses, probably shortly after 1927.

Pevsner & Cherry (1998, p. 325) record that "Nos. 40-53 [the whole of the south side of the Square] were repaired and adapted as offices by Ellis, Clarke & Gallannaugh for Abbey Life Assurance, 1970-92, linked to extensions provided in the Bedford Avenue annex behind. Original decoration was meticulously restored." Ellis, Clarke & Gallannaugh were active from at least the 1950s, gaining some renown for their steel-frames modernist office and other civic buildings. A set of plans by the firm dated 1972 show a layout in the Bedford Avenue annex, including a corner stack on the façade to the yard, comparable to that appearing in the 1909 plans, but propose the formation of an extension into the yard at basement level and a complete internal rearrangement which suggests that the present yellow-brick annex building with ground-floor terrace was part of a comprehensive reconstruction of the annex ranges behind the Bedford Avenue façade in connection with this scheme. A sectional elevation shows a proposed two-storey link structure between the two

buildings, with a timber and glazed elevation at ground-floor comparable to that which currently exists. Other major internal rearrangements proposed in these plans, and which seem to accord with the existing condition are the extensive reorganisation of partitions in the rear rooms and around the staircase at the rear of the third floor

Although comparison with the existing condition of the house and with the 1974 works described below suggest that not all of the work proposed by Ellis, Clarke & Gallannaugh was carried out, that which was is presumed to have taken place between the time of the above application by Reckitt & Coleman and a 1972 application by Messrs. Cannon, Morgan and Rheinberg of St Albans, approved by the Borough, for various works throughout the building – presumably in connection with its occupation by a new tenant. The accompanying plans, HB294, have not been located, but the decision notice describes the works as follows:

- "(a) The replacement of the central, rear basement windows by a glazed door of appropriate design;
- (b) The removal of partitions and other works in the basement;
- (c) The removal of the partition in the first floor rear room;
- (d) The removal and alteration of partitions on second floor;
- (e) The erection of a fire-resisting screen at the head of the stairs and other proposed works and other proposed works on the third floor, subject to the following conditions:-
- 1. That the new railings and handrail at ground floor level should match those existing and the flights from ground to first floors, and shall be detailed to the satisfaction of the Council."

In 1974, Camden Council approved an application for alterations to WCs submitted by Bovis Construction. Only a drainage application and drainage plans have been identified with these works, suggesting that it was deemed too insignificant to merit a listed building consent application. The submitted plans nonetheless identify some alterations to the fabric apparently made since the 1963 plans, and thereby confirm that the Ellis, Clarke & Gallannaugh plans were apparently only partly realised. The 1974 proposed works included:

- Clearance of earlier partitions from the front room of the basement, to form a single room centred on the chimneybreast, with two WCs formed behind the window beneath the main entrance door.
- The removal of the foremost lateral screen or partition between the ground-floor rooms to form one long front room, with a structural beam or downstand apparently indicated spanning the room and bearing perpendicular on the rearmost corner of the front chimneybreast. The doorway from the stair compartment into the rear room has been blocked.
- The replacement of earlier asymmetrical doors in the hallway screen with a pair of symmetrical double doors.
- The removal of all earlier lateral partitions and screens from the first floor.
- The closet wing to the rear of the stair compartment appears to have been significantly
 altered or entirely reconstructed between 1963 and 1974, as it is shown on plans with a
 canted projection into the yard
- Significant alterations to the annex building, including the construction of a flat-roofed basement-level extension into the yard across the full width of the elevation, lit by three rooflights. The extension appears to have provided a single large room extending to the Bedford Avenue frontage, presumably used as office space. Double doors from the connecting corridor at ground-floor level open onto its flat roof. Plans show a lateral subdivision of the annex building, with basement and ground-floor levels apparently

accessed from No. 41, but first-floor accessed via a dedicated and partitioned stair directly from a doorway opening onto Bedford Avenue. Rooflights are shown in the southern roofslope of the annex building above first-floor level, but a stair continues up to a space at second-floor level, not shown.

2.4 Research Sources

John Summerson (1945) Georgian London

Andrew Byrne (1990) Bedford Square: An Architectural Study

W. Edward Riley & Lawrence Gomme (Eds.) (1914) *Survey of London: St Giles-in-the-Fields, Part II* (Volume 5)

Nikolaus Pevsner & Bridget Cherry (1998) Buildings of England: London 4, North

London Borough of Camden (2011) *Bloomsbury Conservation Area Appraisal & Management Strategy*

Historic England (n.d.) National Heritage List for England: Camden, Bedford Square (South Side) Nos. 40-54 (Consecutive) (List entry number: 1244553)

3. Statement of Significance

Bedford Square is one of the finest Georgian residential developments in Britain, and along with elements of the surrounding Georgian streets forms part of an historic architectural ensemble of international importance. The Grade-I designation of the square in the first phase of such listings in 1951, and the listing of the central garden itself at Grade II*, and surviving associated street furniture at Grade-II, reflect its high significance. The Bloomsbury Conservation Area is, similarly, considered among the most significant conservation areas in the country, incorporating important Victorian and twentieth-century buildings and townscapes alongside its first-phase Georgian development.

The designation of 41 Bedford Square at Grade-I formally denotes its possession of special architectural and historic interest of the highest degree. As part of the wider square, it is a principal element contributing to the character and appearance of the Bloomsbury Conservation Area, which was designated to protect the historic and architectural interest of Bloomsbury as a designed Georgian townscape, evolved through the subsequent centuries. These designations provide a formal benchmark of the site's degree of significance, but the elements of heritage interest which compose it require more detailed elaboration in order to provide a guide to the acceptable scope of development or alteration. As such, the significance of 41 Bedford Square is composed of all the features and qualities that give it historic and architectural special interest, and other sorts of heritage interest connected, for instance, with its contribution to the conservation area. In the language of the government's guidance documents under the National Planning Policy Framework (NPPF), these can be described as aspects of architectural, artistic, historic or archaeological interest.

The Historic England List entry does not provide a detailed statement of significance, but as well as describing the architectural character of the exteriors, and decorative elements of particular architectural interest surviving in the interiors, makes the following summary observation:

"The houses in Bedford Square form a very complete and important example of C18 town planning. Built as a speculation, it is not clear who designed all the houses. [Thomas] Leverton was a country house architect and may have been involved with only the grander houses... [Robert] Palmer was the Bedford Estate surveyor and may have been responsible for the vagaries of the square. The majority of the plots leased by the estate were taken by Robert Grews, a carpenter, and William Scott, a brickmaker. The following have plaques or tablets: No. 41 was the residence of Sir Anthony Hope Hawkins, novelist..."

Nikolaus Pevsner and Bridget Cherry, noting that it is "the best preserved of all London squares", observe that it is also "the finest urban development of [its] time...":

"Each side of the square is treated as a single unit, with stuccoed and pedimented centrepiece, the only London square of this type to survive complete. The broad doorways with Coade stone rustication and handsome fanlights, and the use of stucco for the ground floor, echo Adams developments around Portland Place, St Marylebone. The interiors differ, making use of a variety of combinations of rooms with curved ends, often with bows overlooking the gardens behind, the main rooms with refined plasterwork detail in the Adam manner. The most unusual is No. 1, designed by Thomas Leverton, which has a centrally-placed doorway leading to an entrance hall filling the whole width of the three-bay front. Leverton was involved in some of the other interior work in the square, although there is no evidence that he designed the exteriors."

Bloomsbury Conservation Area was one of the first designated in the country after the enabling legislation was passed in the 1960s. Bedford Square, as a principal and exceptionally-well preserved

example of the one of the early phases of the area's development, is indispensable to the special architectural and historic character and appearance of the Conservation Area which occasioned its protection. The qualities of significance of the buildings as a piece of town-planning and an architectural composition described in the rest of this section, are reiterated in Camden Council's 2011 *Conservation Area Appraisal and Management Strategy* as the qualities of positive contribution made by the square to the Conservation Area.

The houses' architectural consistency, principally in the exterior composition and planning, and their interior decoration and designed variations, are, then, consistently identified as Bedford Square's greatest elements of historic and architectural interest.

With regards to No. 41 and elements of historic, architectural, artistic and archaeological interest can be summarised as follows:

3.1 Assessment of Significance

3.1.1 Architectural Interest

Bedford Square's principal architectural interest is as a near-perfectly preserved residential square of the 1770s, and one which was influential in the subsequent development of Bloomsbury and of residential architecture elsewhere. Its grandeur of composition is underlined by its qualities of symmetry and decorative unity, which means that all the houses of the Square form an intimately connected group. The dressings and architectural elements which contribute detail to and compose its palatial facades – even in the fact of their sometimes rudimentary quality, as observed by Pevsner – are all elements of high architectural interest. The façade of No. 41 to the Square, along with attached railings and the bridge and steps, is perhaps the most important architectural feature of the house.

The interior of the house is of high architectural interest where elements of its original plan-form, material construction, and evidence of historic uses remain, in the sense that these are intrinsic to the designed unity and function of the house as part of the Bedford Square development; though they are perhaps of less interest than the house's exterior. Among these interior architectural elements, there is a gradient of interest, such that the finest, crafted decorative elements, such as the moulded plaster ceilings of the principal rooms, are most precious, followed by associated facing features such as historic skirting, doors and sash windows and their frames, and then standardised historic construction materials including floorboards and lathe-and-plaster wall fabric. These are all elements of architectural interest. Since the basement and third floors have been subjected to the most alteration in the main house, the interesting features are thus concentrated between the ground and second floors, with the ground- and first-floors among these – which were the highest-quality rooms of the original construction – having especially significant architectural interest. The cantilevered stone stair and its associated features is of similarly high interest.

Areas of modern construction, where plan-form has been altered, such as in the closet-wing and in many of the plasterboard partitions and modern office finishes of the basement and third floors, have no architectural interest. Modern rooflights and doors, including the glazed door to the basement lightwell area, are of no architectural interest.

3.1.2 Historic Interest

The intact form and decorative unity of Bedford Square is a record of historic interest for the way it evidences housebuilding and domestic architecture in the revival of residential development in London which extended into the early nineteenth century. The use of standardised Coade-stone decorative elements produced in Lambeth, and the speculative development of the Square with

strong oversight by an estate, but otherwise by entrepreneur developers without great architectural expertise or leadership, set the pattern for the development of much of the building-out of Bloomsbury, Marylebone and other areas of Inner London during the following half-century. No. 41 is part of this historically-interesting piece of town planning.

The designed qualities particular to No. 41 within the square have a subtly different sort of historic interest for the small clues they give us about its early occupants and their lives and preoccupations, as a segment of London society at a particular moment in the past. Even modest areas of plan-form or historic features from service quarters can carry historic interest as evidence of the past uses and users of the house – however, few of these survive at No. 41. Sir Anthony Hope Hawkins is a figure of modest historic significance, but the only alterations that can be confidently associated with him – those of the 1909 reconstruction of the 11 Bedford Square with a billiard room and bedrooms and the first two-storey link structure in the rear yard – are no longer in evidence. The personal, as opposed to general urban, historic interest of Nos. 41 & 11 is thus limited.

3.1.3 Artistic Interest

No. 41 is not known to feature in or to have contributed to any artistic works of particular significance; however, Bedford Square as a whole has been extensively depicted and described in cultural works. As such, the contribution of No. 41's exterior, and to a limited degree its interior, to the unity of the whole square is its only source of artistic interest.

3.1.4 Archaeological Interest

Archaeological interest relates to the evidence that standing or buried fabric can provide of the past. The sequence of physical changes evidenced by the standing fabric of the house is thus an aspect of archaeological interest in so far as the alterations relate to periods and changes that are of interest. In practice, archaeological evidence of past alterations is often best recorded archivally, since the alterations themselves will often have harmed or obscured the significance of older fabric. In Bedford Square, where heritage significance is overwhelmingly to do with original designed qualities, archaeological interest is very limited; however, the house must still be treated with care and integrity as a material record of the past.

3.2 Summary of significance by location

Focusing on surviving fabric of architectural and historic interest, the significance of different areas of the house and annex building can be summarised as follows.

3.2.1 Annex building, connecting corridor and yard

The 1974 plans indicate that substantial alteration and reconstruction had taken place in all areas behind the original rear facade of the 1890s annex. Given the extent of works evident between only 1963 and 1974, it seems unlikely that any earlier external fabric, and therefore little historic fabric within the building, could have survived behind the rebuilt facade to Bedford Avenue. Since the photograph of the yard apparently taken in 1973 (Appendix B), the internal façade of the annex has apparently been entirely rebuilt in a simple historicist style in yellow brick with sash windows, and historic plans suggest that the entire annex and accompanying link structure date from about this period.

Some historic brickwork may have been retained from the structure connecting the main house to the mews, or in the internal walls of the annex itself, but this is likely to have been heavily altered, and in either case dates to the 1890s at the earliest.

3.2.2 Basement and third floors

Within the house, the front basement and third-floor levels have undergone considerable alteration, with most partitions somewhat altered. Their original form may have been reinstated, recovering the architectural significance of the sequence of volumes, but some of the fabric is likely to be modern and perhaps of modern materials and construction techniques, and may therefore have relatively low architectural significance.

3.2.3 Ground and first floors

Alterations at the principle ground- and first-floor levels, associated with an apparent school use during the mid-twentieth century, appear to have been reversed in the 1970s, perhaps as part of Ellis, Clarke & Gallannaugh's refurbishment, which Pevsner & Cherry noted, included the "meticulous" (p.324) restoration of decoration. In these areas, the reinstated fabric – even where it is of recent date – will have greater architectural significance than the undecorated and standard fabric and volumes of the upper and lower floors, since it is now part of the coherent interior architectural scheme which is original or authentic to the house.

4. Heritage Impact Assessment

4.1 Statutory Assessment and Planning Guidance

Proposals will be assessed by Camden Council against its statutory obligation under the 1990 Planning (Listed Buildings and Conservation Areas) Act when determining whether to grant listed building consent. Considering No. 41 as a listed building, the Act requires the Council 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". The Act also requires the Council to "preserve or enhance" the "character and appearance" of the Bloomsbury Conservation Area. These features of special architectural or historic interest, character and appearance, have been briefly reviewed as part of the Assessment of Significance, above.

The Council officers will be guided by national planning policy, supplemented by the London Plan and its guidance documents, as well as local planning policy and guidance on more detailed considerations of townscape, conservation and design. The London and Camden supplementary planning documents accord with the provisions of the Act and the NPPF. Since nothing approaching substantial harm to the special interest of the listed building is proposed by the applicants, the relevant paragraph of the NPPF (2018) is:

"196. 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."

Camden's Local Plan contains detailed policies to ensure high quality design (Policy D1) and the conservation of the historic environment (D2 Heritage) and these will be applied to both the listed building consent application, covering the aspects of the proposal affecting the special interest of the listed building. Policy D1 emphasises Camden's demand of contextual design of the highest quality, while D2 stresses the Council's determination to resist harm to listed buildings and to seek enhancement of conservation areas. Further guidance is provided in the Camden Planning Guidance document 'Design', published in March 2019.

4.2 The Proposals

The proposals are in connection with the ongoing careful refurbishment of No. 41 as approved by Camden Council under applications 2019/4144/L and 2019/3676/P in support of their continued use as offices. Condition 5, pursuant to the listed building consent approval required the submission of joinery details for replacing poor quality modern doors with authentic panel doors. These details and application were approved under 2020/0877/L. During the implementation of this discharged condition, the project team discovered the widespread presence of asbestos panels glued and fixed into the recessed panels of many of the other existing doors. It is presumed that this early form of fire-upgrading work to doors was carried out as part of its conversion to office use in the 1970s.

The asbestos door panels present a significant health risk to the operatives undertaking the redecoration or refurbishment of the doors. Its continued presence will also pose an ongoing health management risk and regulatory liability to the users and owners of the building.

It is therefore proposed to remove this health risk by carefully replacing the asbestos panels from the doors as follows. Each subject door has been surveyed for its condition and method of original construction. Following the survey an itemised scope of work is proposed for each door. The door by door details of this work is set by SMOK Architects, contained in Appendix C. The summary proposed works in the application are summarised as follows:

4.2.1 Stairwell Back Doors at First, Second and Third Floor Levels

Take off the modern panelled door leading into rear annex elevator / service block and replace with new fire-rated wood panel doors to match the existing profiles and painted finish.

Because of the solid glued construction of these doors it will not be practically
possible to safely replace the asbestos sheets without splitting and breaking the
muntin, rails, and stiles of the door. It is there it is proposed to replace the whole
door on a "like for like basis." The impact of the heritage significance will be neutral
as the existing door is modern form part of the 20th Century annex extension

4.2.2 Doors to Rooms at Lower Ground and Third Floor Level

Take off the modern 4-panel timber doors and replace with new fire-rated four-panel doors to match the existing profiles and painted finish. (Door design and relocation previously approved under listed building consent 2020/0877/L)

O Because these modern doors have recessed asbestos panels glued into the stiles, rails and muntin, it will not be practical to safely replace the sheets without splitting and breaking up the door. It is therefore proposed to replace the whole door on a "like for like basis." The impact of the heritage significance will be neutral as the existing doors are modern replica doors and the replacements will be identical in appearance and maintained in the same location.

4.2.3 Door and Glass Façade to Link Block at Basement Level

Modify the approved design of the single glass door and surrounding glass facade which leads into the inner basement level courtyard, with a pair of glass doors in its place. The single glass door design was approved under listed building consent 2019/4144/L. The double door design will provide for a significant reduction in heat loss from the building and the reduce cold-draughts when compared to the frame-less single door design.

 The impact of the heritage significance will be neutral as the existing doors and approved doors a of modern glass construction. The proposed double doors will be fully in glass and overall identical in appearance.

5. Summary Justification

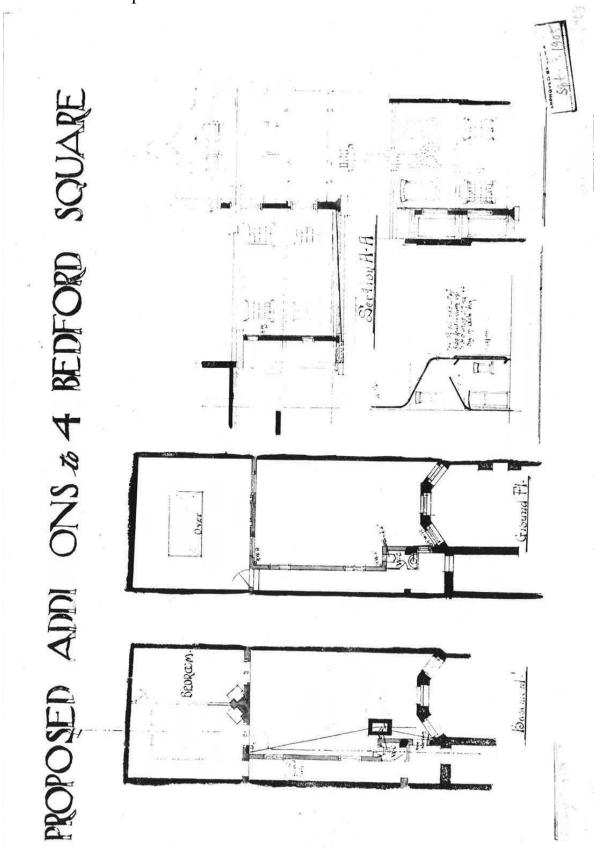
The proposals principally aim to remove dangerous asbestos materials which have been fitted to doors as a fire-barrier during the property's use as a school and offices in the 20th century. Now that the presence of asbestos has been confirmed, the new owners of the building have a duty to protect building maintenance operatives and occupants from any potential health hazards.

The proposals would have a neutral impact on the heritage significance of the building by virtue of only modern materials and elements are being replaced. The alterations do no propose to alter the design and appearance of the doors and the special interest of the listed building is preserved in accordance with the council's Policy D2.

16

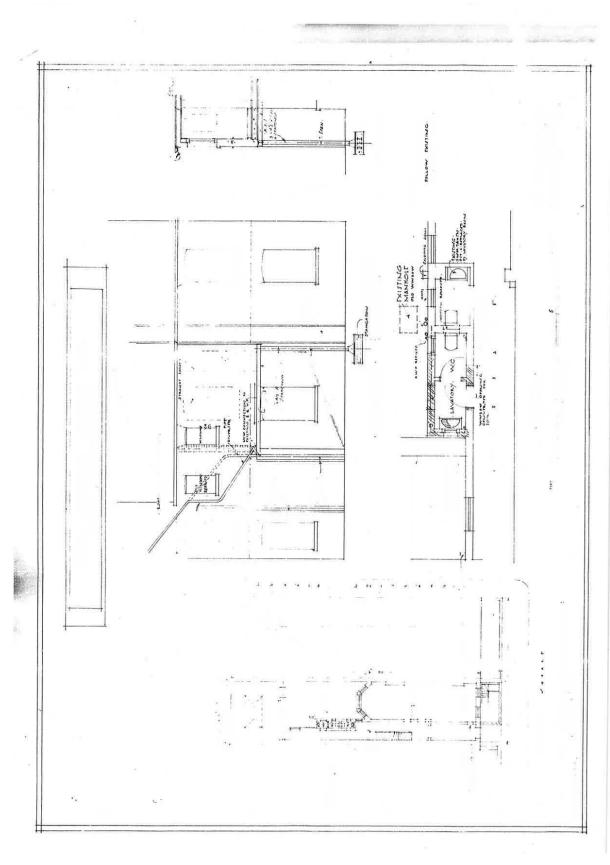
Appendix A

Selected historic plans

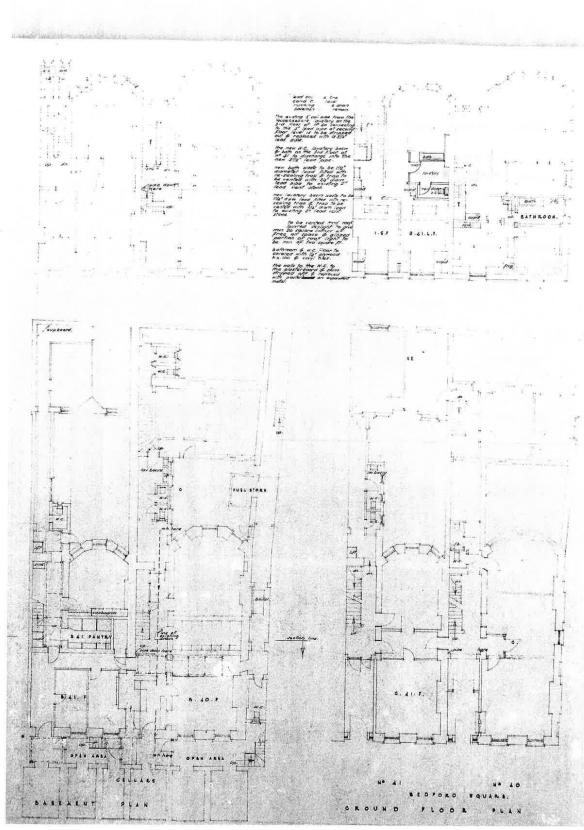


1 Plan drawings for 1909 application (Camden Local Studies Archive)

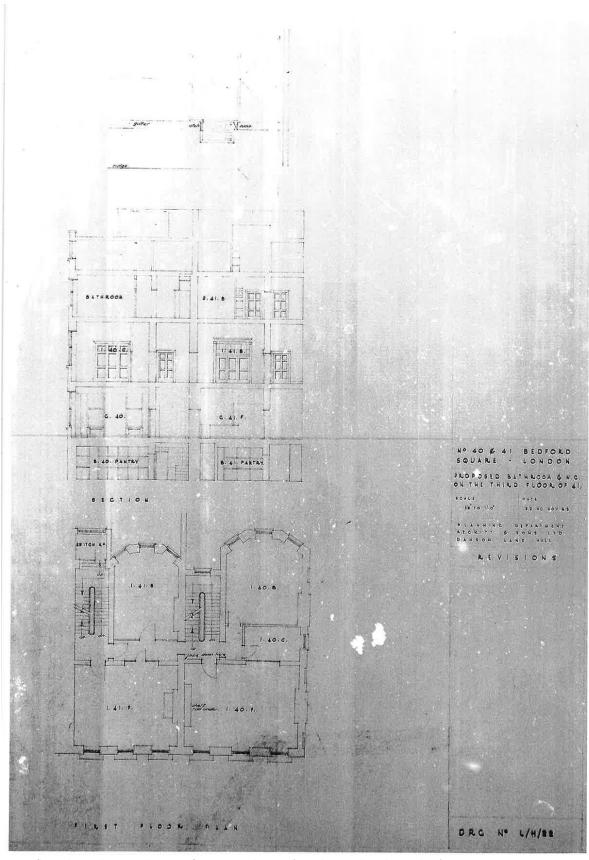
Assembly Associates



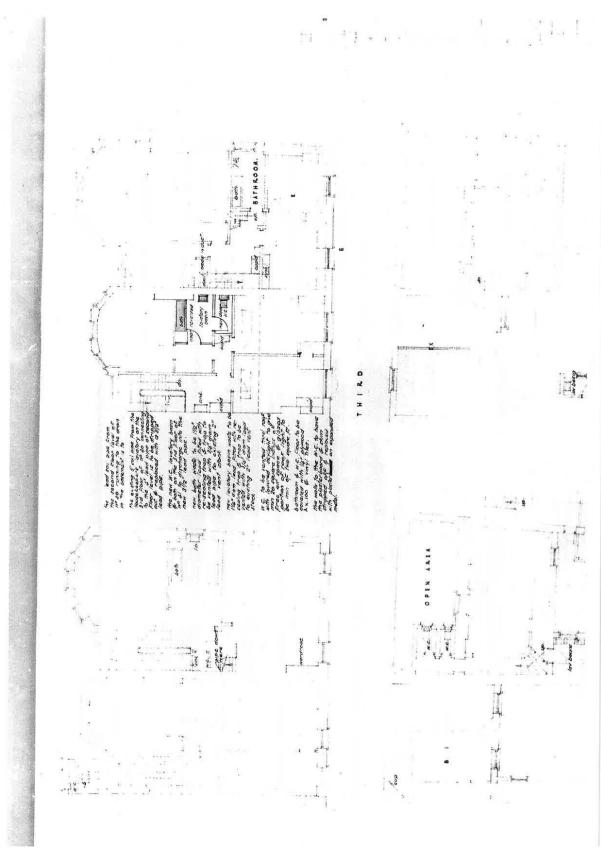
2 Plan and elevation drawings for 1927 application (Camden Local Studies Archive)



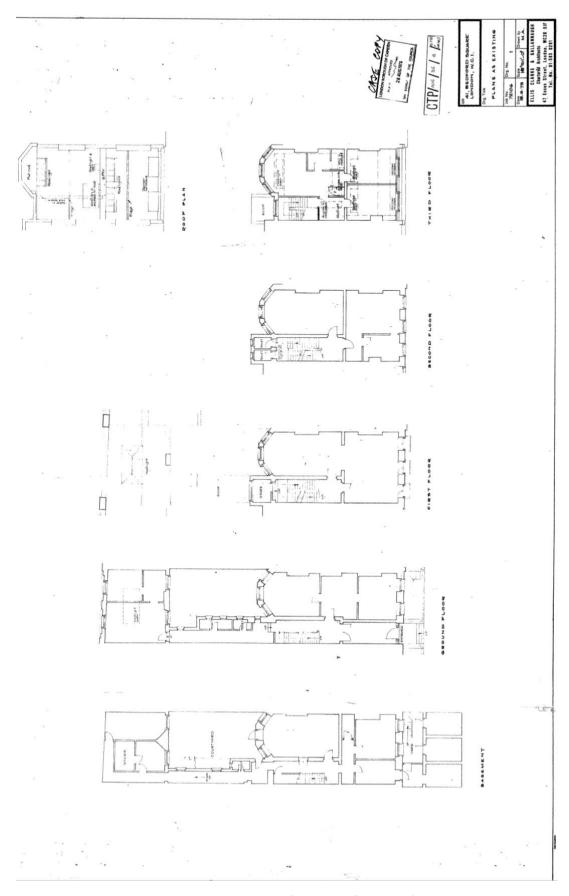
3 Basement and ground-floor plan drawings for 1963 application (Camden Local Studies Archives)



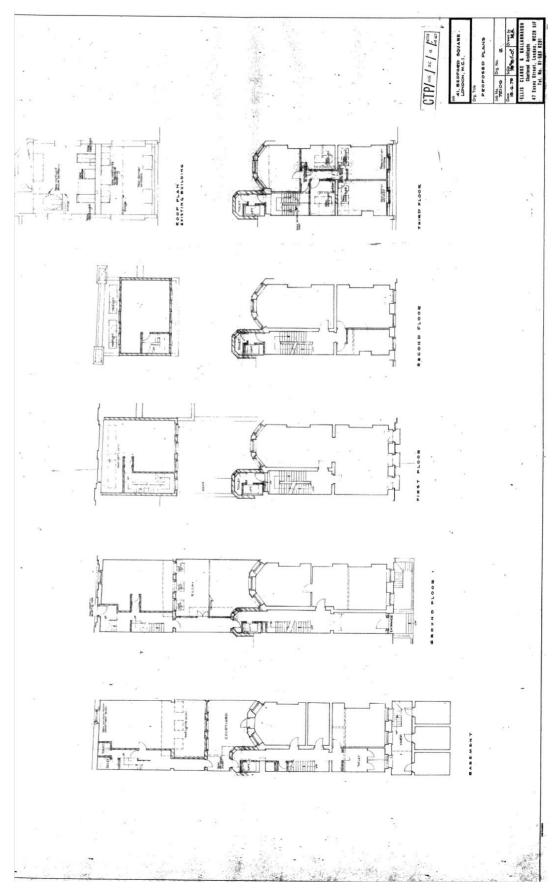
4 First-floor plan and section drawings for 1963 application (Camden Local Studies Archive)



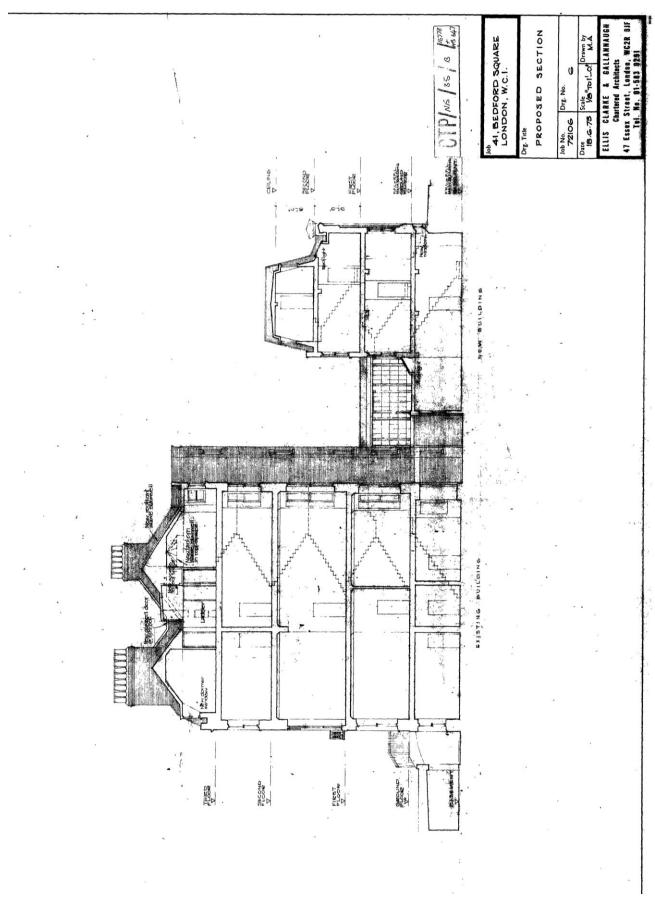
5 Second- and third-floor plans for 1963 application (Camden Local Studies Archive)



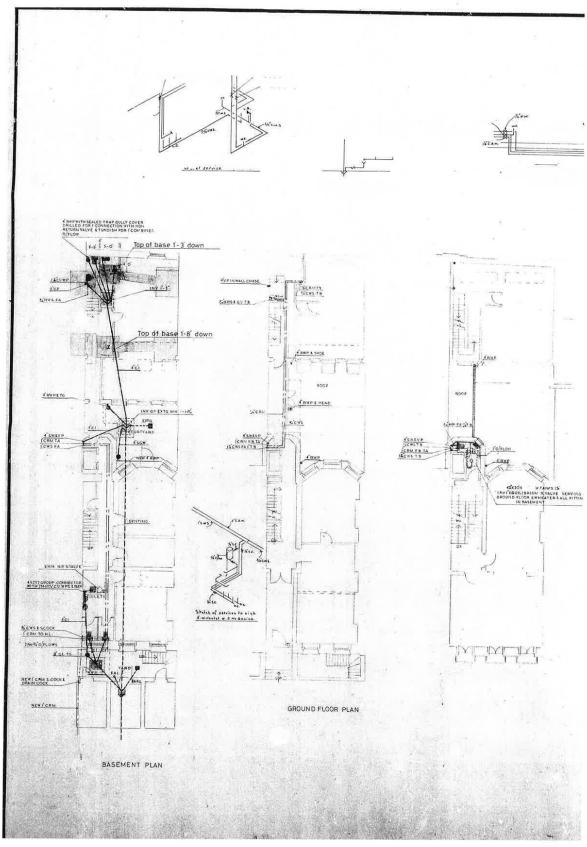
6 Ellis, Clarke & Gallannaugh existing plans, dated 1972 (in applicants' possession)



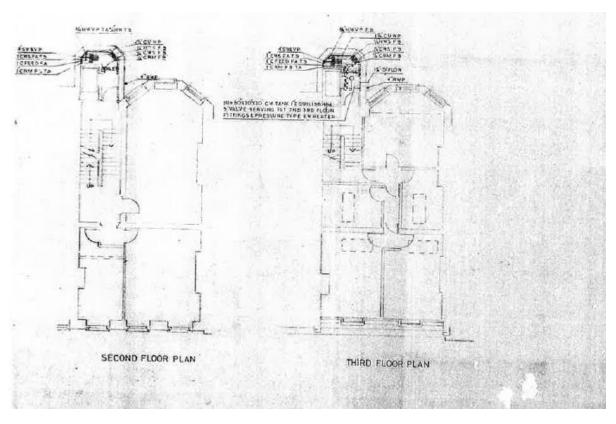
7 Ellis, Clarke & Gallannaugh's 1972 proposed plans (in applicants' possession)



8 Proposed section drawing from Ellis, Clarke & Gallannaugh's 1972 plans (in applicants' possession)



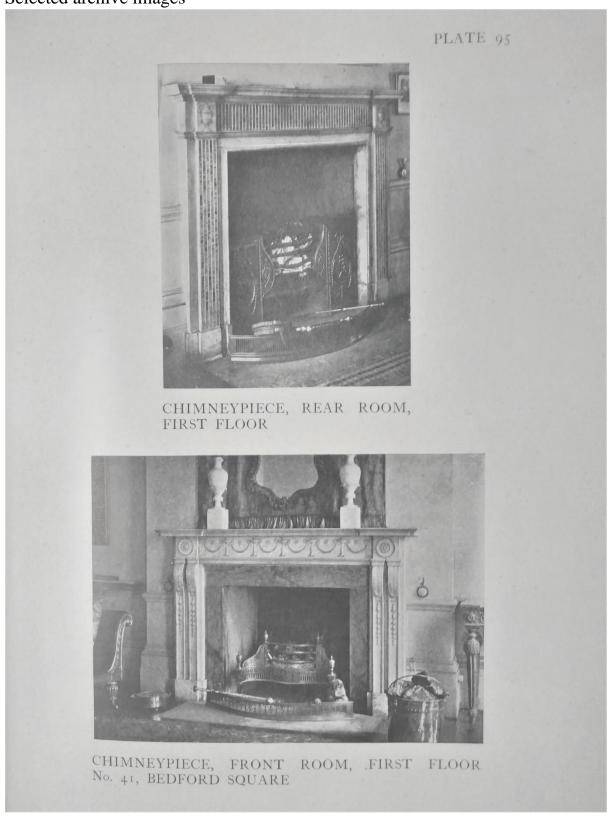
9 Basement, ground- and first-floor plan drawings for 1974 application (Camden Local Studies Archive)



10 Second- and third-floor plan drawings for 1974 application

Appendix B

Selected archive images



11 Plate 95, Survey of London: St Giles-in-the-Fields, Part II (Vol. 5, 1914)



12 Staircase compartment and lobby (London Metropolitan Archive, ref: 70241)



13 Ground-floor front room including chimneypiece (70244)



14 Second-floor front room depicted in 1965 (London Metropolitan Archives, ref: 70203)



15 Second-floor rear room depicted in 1965 (LMA, ref: 70204)



16 Yard and annex building in 1973, showing early-twentieth century facades (London Metropolitan Archives, ref:70281)

Appendix C

Survey & Schedule of Works to Doors for Asbestos Remediation Produced by SMOK Architects

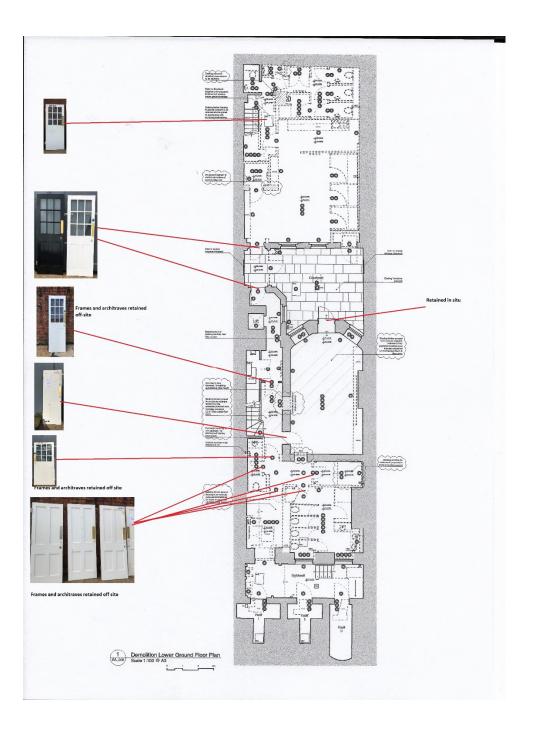
LOWER GROUND FLOOR			Asbestos Containing Material/No	Actions / Risks	
Door Ref :	ТҮРЕ	Fire Rating proposed	Asbestos detected/Further test required		
DLG 003	4 solid panel , square recessed	FD30S	ACM	This is a glued sandwich construction. Unable to dismantle with out major damage to door construction. Remedial works cannot be certified as FD30.	
DLG 004	9 glazed panes , 2 flush panels	FD30S	Test required	Similar construction to DLG 011 but will need to carry out a test to rule out ACM's.	
DLG 008	9 glazed panes , 2 flush panels		Test required	Similar construction to DLG 011 but will need to carry out a test to rule out ACM's.	
DLG 011	9 glazed panes , 2 flush panels	FD30S	NAD	No action required	
DLG 014	9 glazed panes , 2 flush panels		Test required	Similar construction to DLG 011 but will need to carry out a test to rule out ACM's.	
DLG 023 GROUND FLOOR	9 glazed panes , 1 flush panels	FD60S	NAD	No Action required. But door is only 44mm thick.	
DG 002 (Pair)	6 panel glazed door		NAD	No action required	
DG 003	6 panel HW door	FD30S	ACM	Panels are glued and beaded in one side. The other side is glued into rebate. Beads will need replaced and damage to rebated side is to be expected. Remedial works cannot be certified as FD30.	
DG 004	6 panel HW door	FD30S	ACM	Panels are glued and beaded in one side. The other side is glued into rebate. Beads will need replaced and damage to rebated side is to be expected. Remedial works cannot be certified as FD30.	

Locked Door	6 panel HW door		ACM	Panels are glued and beaded in one side. The other side is glued into rebate. Beads will need replaced and damage to rebated side is to be expected.
FIRST FLOOR				
D1 001	6 panel HW door	FD30S	ACM	Panels are glued and beaded in one side. The other side is glued into rebate. Beads will need replaced and damage to rebated side is to be expected. Remedial works cannot be certified as FD30.
D1 002 (2 pairs)	4 panel painted bi-fold doors		Test required	Existing door was not highlighted as FD. Test will be required to rule out ACM.
D1 003	6 panel HW door	FD30S	ACM	Panels are glued and beaded in one side. The other side is glued into rebate. Beads will need replaced and damage to rebated side is to be expected. Remedial works cannot be certified as FD30.
D1 004	Beaded and 3 panelled door, rebated edge	FD30S	ACM	This is a full insulated panel glued into rebate. With mouldings forming dummy panels to front face. Cover bead to rear of door will require renewed. Expect damage to rebate. Remedial works cannot be certified as FD30.
MD1 001	Flush painted with vp	FD30S	Test required	Test required to rule out asbestos core.
SECOND FLOOR		•	•	
D2 001	6 panel painted door	FD30S	ACM	Panels are glued and beaded in one side. The other side is glued into rebate. Beads will need replaced and damage to rebated side is to be expected. Remedial works cannot be certified as FD30.

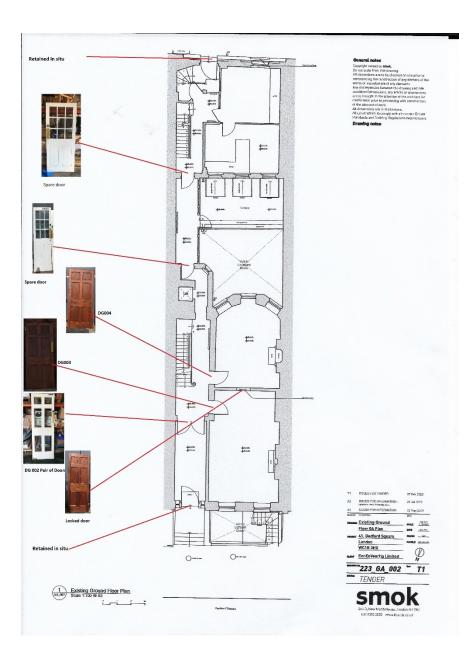
D2 002	6 panel painted door	FD30S	ACM	Panels are glued and beaded in one side. The other side is glued into rebate. Beads will need replaced and damage to rebated side is to be expected. Remedial works cannot be certified as FD30.
D2 003	Beaded and 3 panelled door, rebated edge	FD30S	ACM	This is a full insulated panel glued into rebate. With mouldings forming dummy panels to front face. Cover bead to rear of door will require renewed. Expect damage to rebate. Remedial works cannot be certified as FD30.
MD2 001	Flush painted with vp		Test required	Test required to rule out asbestos core.
THIRD FLOOR				
D3 001	4 solid panel , square recessed	FD30S	ACM	This is a glued sandwich construction. Unable to dismantle with out major damage to door construction. Remedial works cannot be certified as FD30.
D3 002	4 solid panel , square recessed		ACM	This is a glued sandwich construction. Unable to dismantle with out major damage to door construction.
D3 003	4 solid panel , square recessed		ACM	This is a glued sandwich construction. Unable to dismantle with out major damage to door construction.
D3 006	4 solid panel , square recessed		ACM	This is a glued sandwich construction. Unable to dismantle with out major damage to door construction.
D3 007	4 solid panel , square recessed	FD30S	ACM	This is a glued sandwich construction. Unable to dismantle with out major damage to door construction. Remedial works cannot be certified as FD30.

D3 008	6 panel , painted	FD30S	ACM	This is a full insulated panel glued into rebate. With mouldings forming dummy panels to front face. Cover bead to rear of door will require renewed. Expect damage to rebate. Remedial works cannot be certified as FD30.
D3 009	Flush painted eggbox			Replace door with new.
D3 010	4 solid panel , square recessed	FD30S	ACM	This is a glued sandwich construction. Unable to dismantle with out major damage to door construction. Remedial works cannot be certified as FD30.

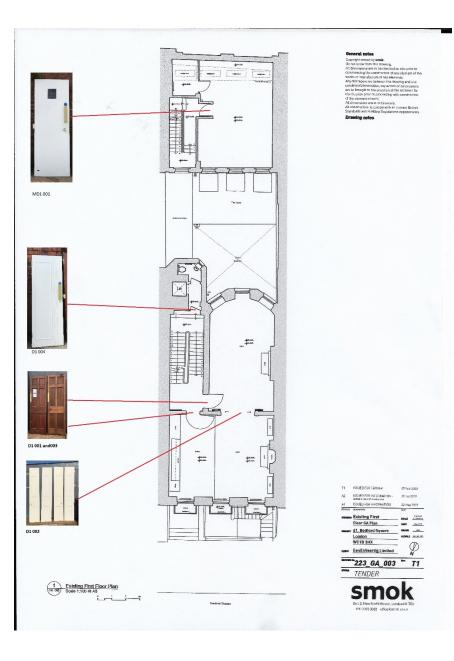
LOWER GROUND FLOOR		Door Style /Type	Panel Thickness	Tested / Results	Comments
DLG 003	Existing door retained in-situ	Painted door 4 solid panel, square recessed. Panel thickness 12mm. Panels rebated into door on all 4 edges	12mm	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Due to the manufacture of this door type it is not possible to modify these doors. To break the mortice joints extensive damage would be caused to timber stiles and mullions. The panels would be damaged with the potential for fibre release and the cleaning out of the rebates would not be feasible presenting an unacceptable risk of release of fibres.
DLG 004	Existing door relocated from existing corridor / lobby	9 glazed panes , 2 flush panels	44mm	No Asbestos materials found	No further action
DLG 008	Existing door retained but location moved within corridor	9 glazed panes , 2 flush panels	44mm	No Asbestos materials found	No further action
DLG 011	Existing door retained in-situ	9 glazed panes , 2 flush panels	44mm	No Asbestos materials found	No further action
DLG 014	Existing door retained in-situ	9 glazed panes , 2 flush panels	44mm	No Asbestos materials found	No further action
DLG 023	Existing door retained in-situ	9 glazed panes , 1 flush panels	44mm	No Asbestos materials found	No further action



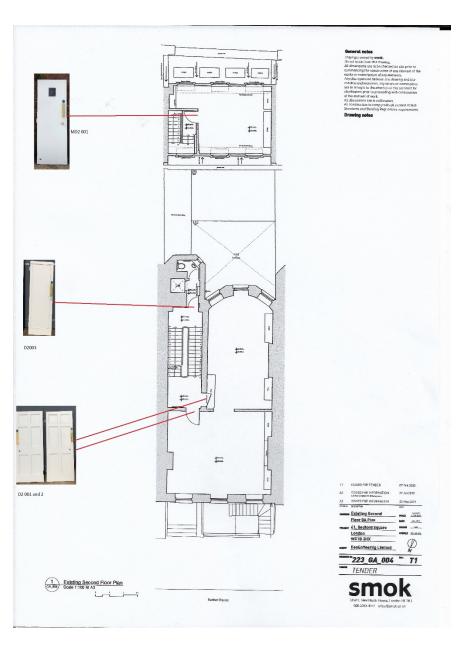
GROUND FLOOR		Door Style /Type	Panel Thickness	Tested / Results	Comments
DG 002	Existing door retained in-situ	Pair 6 panel glazed door	NA	Timber and glass door	No further action
DG 003	Existing door retained in-situ	6 panel HW door	13mm hardwood veneered flat square panel. With bolection type beads	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Panels can be removed and safely disposed. Rebates cleaned and new beads fitted.
DG 004	Existing door retained in-situ	6 panel HW door	13mm hardwood veneered flat square panel. With bolection type beads.	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Panels can be removed and safely disposed. Rebates cleaned and new beads fitted.
Locked Door	Existing door retained in-situ	6 panel HW door	13mm hardwood veneered flat square panel. With bolection type beads.	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Panels can be removed and safely disposed. Rebates cleaned and new beads fitted.



First FLOOR		Door Style /Type	Panel Thickness	Tested / Results	Comments
D1 001	Existing door retained in-situ	6 panel HW door	13mm hardwood veneered flat square panel	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Panels can be removed and safely disposed. Rebates cleaned and new beads fitted.
D1 002	Existing door retained in-situ	2 pair 4 panel painted bi-fold doors	12mm with bolection type beads	No asbestos materials found	No further action
D1 003	Existing door retained in-situ	6 panel HW door	13mm hardwood veneered flat square panel	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Panels can be removed and safely disposed. Rebates cleaned and new beads fitted.
D1 004	Existing door retained in-situ	Beaded and 3 panelled door one face. Other face flush with 25mm half round bead covering board . Rebated meeting stile.	29mm	Back panel are constructed from an Asbestos insulating board containing amosite/crysotile. Front face is timber	The panels to the front of these doors are timber. We believe that the doors have been extensively reworked to include routing out the back of the middle stile and mullions to accommodate the 12mm thick asbestos panel. We are unable to determine if the asbestos panel is glued to the framing or front panels. That can only be reviewed by the Asbestos Removal contractor after 14 day notification and under safe conditions. If that is the case the door will require disposal.
MD1 001	Existing door retained in-situ	Flush painted with vp	44mm.	No asbestos materials found	No further action



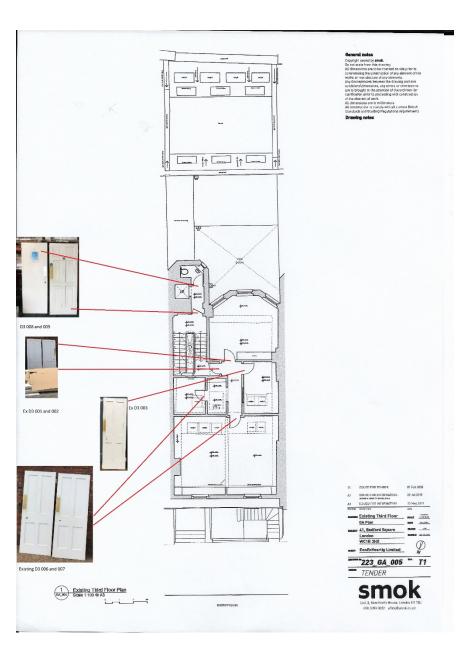
Second		Door Style /Type	Panel Thickness	Tested / Results	Comments
Floor					
D2 001	Existing door retained in-situ	6 panel painted door	12mm with bolection type beads	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Panels can be removed and safely disposed. Rebates cleaned and new beads fitted.
D2 002	Existing door retained in-situ	6 panel painted door	12mm with bolection type beads	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Panels can be removed and safely disposed. Rebates cleaned and new beads fitted.
D2 003	Existing door retained in-situ	Beaded and 3 panelled door one face. Other face flush with 25mm half round bead covering board . Rebated meeting stile.	29mm	Back panel are constructed from an Asbestos insulating board containing amosite/crysotile. Front face is timber	Further investigative work to this door can only be carried out after 14 day notification under controlled conditions.
MD1 001	Existing door retained in-situ	Flush painted with vp	44mm.	No asbestos materials found	No further action

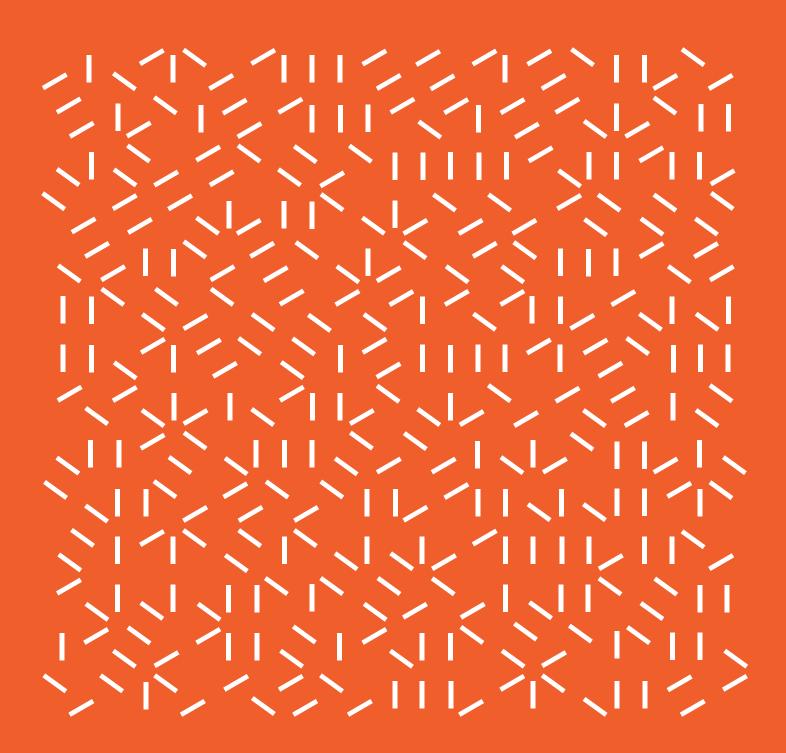


Second Floor		Door Style /Type	Panel Thickness	Tested / Results	Comments
D3 001	Existing door retained in-situ	Painted door 4 solid panel, square recessed. Panels rebated into door stiles and mullions on all 4 edges	12mm square flat panel	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Due to the manufacture of this door type it is not possible to modify these doors. To break the mortice joints extensive damage would be caused to timber stiles and mullions. The panels would be damaged with the potential for fibre release and the cleaning out of the rebates would not be feasible presenting an unacceptable risk of release of fibres.
D3 002	Existing door in new frame	Painted door 4 solid panel, square recessed. Panels rebated into door stiles and mullions on all 4 edges	12mm square flat panel	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Due to the manufacture of this door type it is not possible to modify these doors. To break the mortice joints extensive damage would be caused to timber stiles and mullions. The panels would be damaged with the potential for fibre release and the cleaning out of the rebates would not be feasible presenting an unacceptable risk of release of fibres.
D3 003	Existing door in new frame	Painted door 4 solid panel, square recessed. Panels rebated into door stiles and mullions on all 4 edges	12mm square flat panel	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Due to the manufacture of this door type it is not possible to modify these doors. To break the mortice joints extensive damage would be caused to timber stiles and mullions. The panels would be damaged with the potential for

					fibre release and the cleaning out of the rebates would not be feasible presenting an unacceptable risk of release of fibres.
D3 006	Existing door salvaged from LGF electric cupboard in new frame	Painted door 4 solid panel, square recessed. Panels rebated into door stiles and mullions on all 4 edges	12mm square flat panel	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Due to the manufacture of this door type it is not possible to modify these doors. To break the mortice joints extensive damage would be caused to timber stiles and mullions. The panels would be damaged with the potential for fibre release and the cleaning out of the rebates would not be feasible presenting an unacceptable risk of release of fibres.
D3 007	Existing door in new frame	Painted door 4 solid panel, square recessed. Panels rebated into door stiles and mullions on all 4 edges	12mm square flat panel	Panels are constructed from an Asbestos insulating board containing amosite/crysotile.	Due to the manufacture of this door type it is not possible to modify these doors. To break the mortice joints extensive damage would be caused to timber stiles and mullions. The panels would be damaged with the potential for fibre release and the cleaning out of the rebates would not be feasible presenting an unacceptable risk of release of fibres.

D3 008	Existing door retained in-situ	Beaded and 6 panelled door one face. Other face flush with 25mm half round bead covering board . Rebated meeting stile.	29mm	Back panel are constructed from an Asbestos insulating board containing amosite/crysotile. Front face is timber.	The panels to the front of these doors are timber. We believe that the doors have been extensively reworked to include routing out the back of the middle stile and mullions to accommodate the 12mm thick asbestos panel. We are unable to determine if the asbestos panel is glued to the framing or front panels. That can only be reviewed by the Asbestos Removal contractor after 14 day notification and under safe conditions. If that is the case the door will require disposal.
D3 009	Existing door retained in-situ	Flush plywood eggbox door		No asbestos materials found	No further action required.
D3 010	Existing door retained in-situ	Painted door 4 solid panel, square recessed. Panels rebated into door stiles and mullions on all 4 edges	12mm square flat panel	The panels are constructed from a mineral fibre board. No asbestos materials found.	No further action required





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