

Heritage Statement



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19 Bedford Square, London WC1B 3JA

On behalf of: The Bedford Estates

Date: January 2022

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Cogent Heritage Ref: 0444

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PART I: Introduction

1. This Heritage Statement has been produced by Ignus Froneman of Cogent Heritage, in consultation with the Applicant (The Bedford Estates) and Johanna Molineus Architects. The report supports an application for the sensitive upgrading of the grade I listed 19 Bedford Square in the London Borough of Camden.
2. The Heritage Statement should be read alongside the application drawings, Design and Access Statement and all other submitted information.

Heritage assets

3. **Listed buildings:** As noted above, 19 Bedford Square is listed grade I, as part of a single entry that takes in numbers 12-27 and their attached railings. In fact, all of the terraced houses fronting the square are listed, and most of them at grade I.
4. **Conservation area:** The application site falls within Sub Area 5 of the Bloomsbury Conservation Area, which can be seen on the map at **Figure 1** (the map also shows listed buildings in black and 'positive' unlisted buildings hatched). As can be seen from the conservation area map, the part of the conservation area in the context of the application site takes in the setting of the listed buildings on Bedford Square. The proposed external changes are very limited and the assessment is undertaken on the broad basis that any change that preserves or enhances the special interest/significance of the grade I listed building would likewise also preserve the character, appearance and significance of the conservation area, which in this location derives its interest from the formally composed, unique and well-preserved Georgian square/townscape.

Purpose, scope and structure of the statement

5. The purpose of this document is essentially twofold. It firstly provides an assessment of the significance of 19 Bedford Square, to a proportionate degree of detail to enable an understanding of the potential impacts, in accordance with paragraph 194 of the National Planning Policy Framework (NPPF). The impacts of the proposed development are then assessed against the significance of the listed building, in accordance with NPPF paragraphs 194 & 195.
6. The relevant legislation and policy framework applicable to this application is set out at **Appendix I**. This report accords with Historic England's guidance on heritage assessments *Statement of Heritage Significance: Analysing Significance in Heritage Assets* Historic England Advice Note 12 (October 2019).
7. The remainder of the report is structured as follows:
 - PART II:** An assessment of the significance of the listed building, starting with an overview of its historic development.
 - PART III:** An overview of the proposed development and impact assessment.
 - PART IV:** Conclusions.

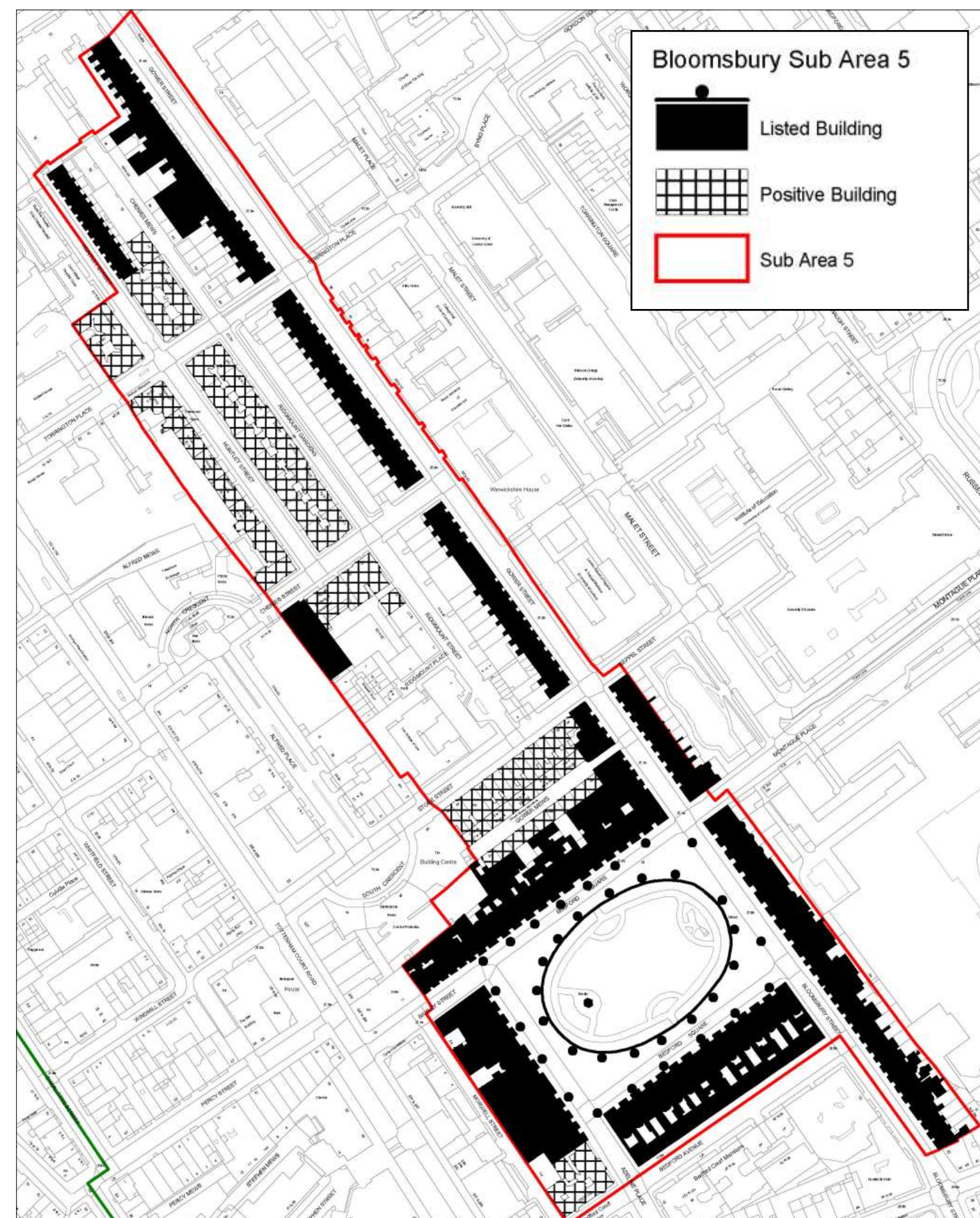


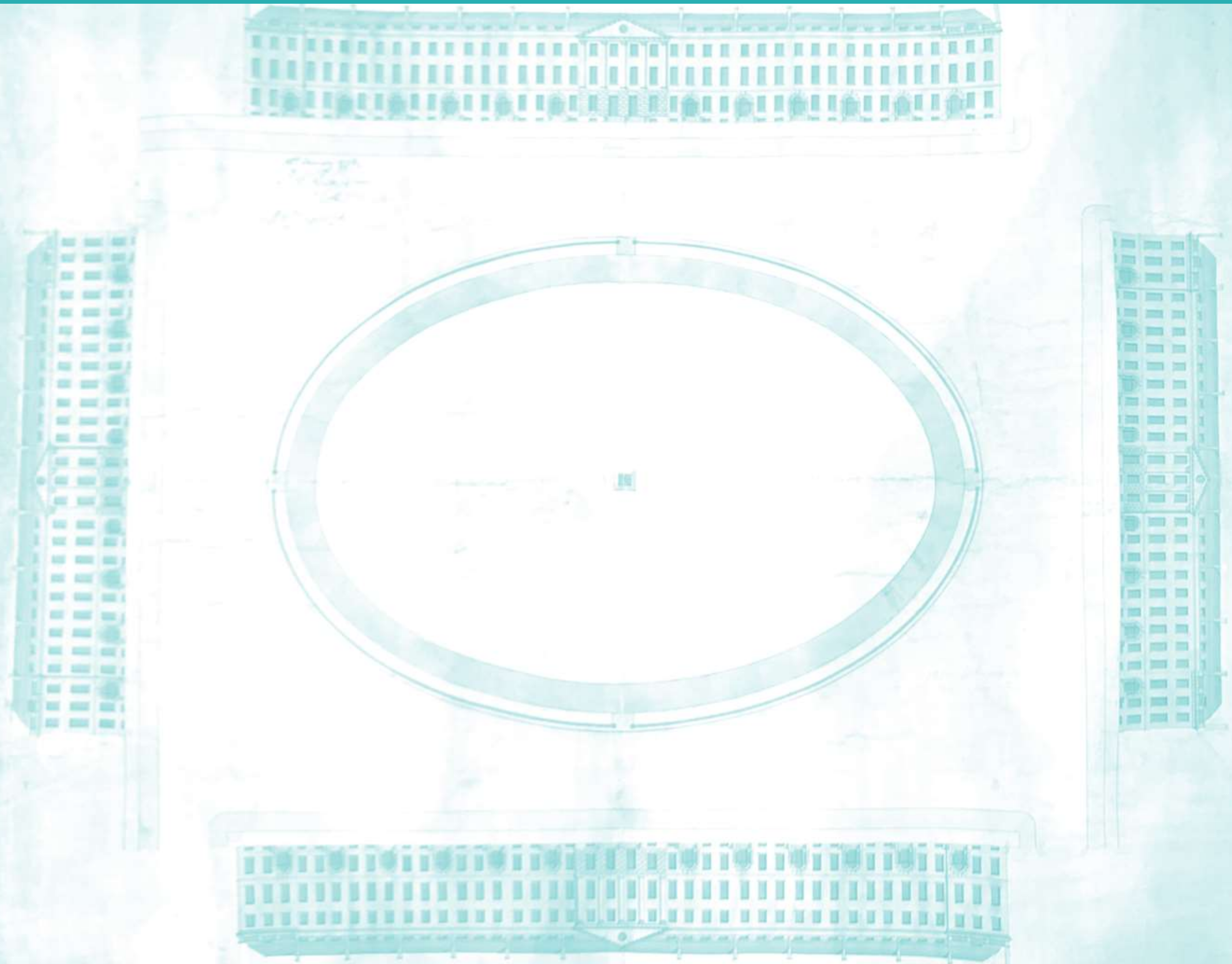
Figure 1: A map extract of Sub Area 5 of the Bloomsbury Conservation Area, from the Bloomsbury Conservation Area documents, available online on Camden's website.

PART I: Introduction

Site inspection and documentary research

8. The assessment was informed by a site visit, in November 2021, when the listed building was subject to a non-intrusive inspection (no surface/decorative treatments were removed to expose underlying fabric). Photos were taken on the site visit, a selection of which have been included to illustrate the report; they have not been altered, aside from cropping or annotation in some instances.
9. Documentary research of commonly available sources, including The Bedford Estates' and Camden's archives, was undertaken. The research was taken to a proportionate level of detail and intended to be informative, but not exhaustive. It is therefore possible that other sources of historic information about the building may exist, although for the purposes of this assessment the sourced information was sufficient to make an informed assessment.

PART II: Assessment of significance



PART II: Assessment of significance

10. The following section starts with an overview of the general historic background, synthesised from Camden's *Bloomsbury Conservation Area Appraisal and Management Strategy* (18 April 2011) (the 'Appraisal' hereafter), the *Survey of London*¹, the *Pevsner guide*², *Bedford Square: An Architectural Study*³ and documents sourced as part of the research. That is followed by an assessment of the significance of the listed building, with particular focus on the areas where changes are proposed.

Historic background

11. The Appraisal notes that Bloomsbury represents a period of London's early expansion northwards, dating from Stuart times (around 1660), which continued through the Georgian and Regency periods up to around 1840. This period of expansion, which followed the Plague in 1665 and the Great Fire of London in 1666, replaced a series of Medieval Manors on the periphery of London and their associated agricultural and pastoral land. The first swathe of building created a mix of uses with houses, a market (Covent Garden), commercial, cultural uses (the British Museum), hospitals and churches. Later expansion to the north was focussed on providing grander residential districts for wealthy families. This was carried out speculatively by a number of builders, on leases from major landowners, and followed a consistent form with terraced townhouses constructed on a formal grid pattern of streets and landscaped squares.
12. Covent Garden was a key architectural development that strongly influenced the form of Bloomsbury. In 1630 the developer, the Duke of Bedford, and his architect, Inigo Jones, introduced Palladian architecture to England in the form of a public square, addressed by a church and arcaded terraces of houses, and surrounded by grids of streets. This was a key departure from the prevailing pattern of development, based on narrow medieval streets, alleys and courtyards, and it set the scene for the next three centuries.
13. The manor of Bloomsbury, seized at the Dissolution, was assigned in 1550 to the 1st Earl of Southampton, Thomas Wriothesley Lord Chancellor of Henry VII. Land ownership elsewhere became fragmented. The land was first developed by the 4th Earl, who had obtained a royal license to build his residence, Southampton House, in 1640. Widespread development began following the Restoration. Landowners saw the potential for new fashionable suburbs to be developed, and took their inspiration from Covent Garden. Development extended northwards from St Giles High Street to Great Russell Street and between Holborn and Great Ormond Street.
14. The later Georgian and Regency period saw the rapid expansion of development northwards from Great Russell Street and Great Ormond Street towards to Euston Road, as landowners capitalised on demand from the expanding wealthy classes.

15. On the Bedford Estate, the 4th Duke had initiated the plans to capitalise on the demand for land for building, although the land to the north of Bedford House was deliberately left open to maintain his view of the hills of Hampstead and Highgate. Plans for Bedford Square, on the western edge of the estate, were conceived in the 1760s and, following the Duke's death in 1771, were advanced by his widow.
16. Bedford Square was designed as a unified architectural composition, though it was built by different builders, with strict controls over the design of the elevations. Its construction marked the beginning of systematic development of the land to the north. Unlike the earlier development, it was intended to be a grander, primarily residential district.
17. The *Survey of London* notes how the Bedford estate, with its wide streets and spacious squares, is an excellent example of early town planning, and affords an illustration of the advantages gained when a large area such as this is dealt with on generous lines by the owner.
18. According to the *Survey of London* [ibid], no drawing has been found showing the design for the laying out of Bedford Square, which was carried out between the years 1775 and 1780. However a plan of 1776, held by The Bedford Estates' archive (ref BI-P823), shows the proposed Bedford Square layout plan, and includes the four facing elevations (**Fig 2**).
19. The plots were leased by the Duke to various building owners. One plot was taken by Thomas Leverton, architect, and 24 by Robert Crews and William Scott, builders. These builders acquired many more plots on the estate, and it may be supposed that, as they at times worked in partnership, the whole of the buildings in the square and the houses in several of the adjoining streets were erected by them, partly as a speculation and partly as builders for other lessees.
20. The *Survey of London* [ibid] speculates there is much to support the view that Thomas Leverton was the author of the general scheme and the designer of the houses. He took up a building lease of No. 13 in 1775, practically at the beginning of building operations. He was a well-known architect, who adopted the style of the period as represented by Henry Holland and the Brothers Adam. His work shows well-balanced composition and refinement of detail. He employed, moreover, many of the designers who worked for the Brothers Adam, such as Bonomi, the clever draughtsman and architect, Angelica Kauffmann and Antonio Zucchi, the Italian artist. It is also said that he employed Flaxman to execute carving, and skilled Italian workmen to carry out his beautiful designs for plasterwork on ceilings.
21. With regard to the suggestion that the Brothers Adam were the designers of Bedford Square, it may be said that the only drawings found in relation to the square by these celebrated architects are in the Soane Museum, and represent two ceilings designed for Geoffrey Stainsforth, Esq., dated 1779. Stainsforth took up his residence at No. 8 Bedford Square in that year, but the house had already been in existence for some time, as it is referred to as the northern boundary of No. 7, on 20th November, 1777. There is no evidence that designs for the ceilings referred to were actually carried out, as the present ceilings of the house are plain.
22. The general architectural scheme of the square is interesting. As can be seen from **Fig 2**, each side is separately treated as an entire block of buildings, having a central feature and wings. The central feature of each side is carried out in stucco, having pilasters and

1. 'Bedford Square (general)', in *Survey of London: Volume 5, St Giles-in-The-Fields, Pt II*, ed. W Edward Riley and Laurence Gomme (London, 1914), pp. 150-151. *British History Online* <http://www.british-history.ac.uk/survey-london/vol5/pt2/pp150-151> [accessed 21 December 2021].

2. *London 4: North (Pevsner Architectural Guides: Buildings of England)*, Pevsner, N (1998).

3. *Bedford Square: An Architectural Study*, Byrne Andrew (1990).

PART II: Assessment of significance

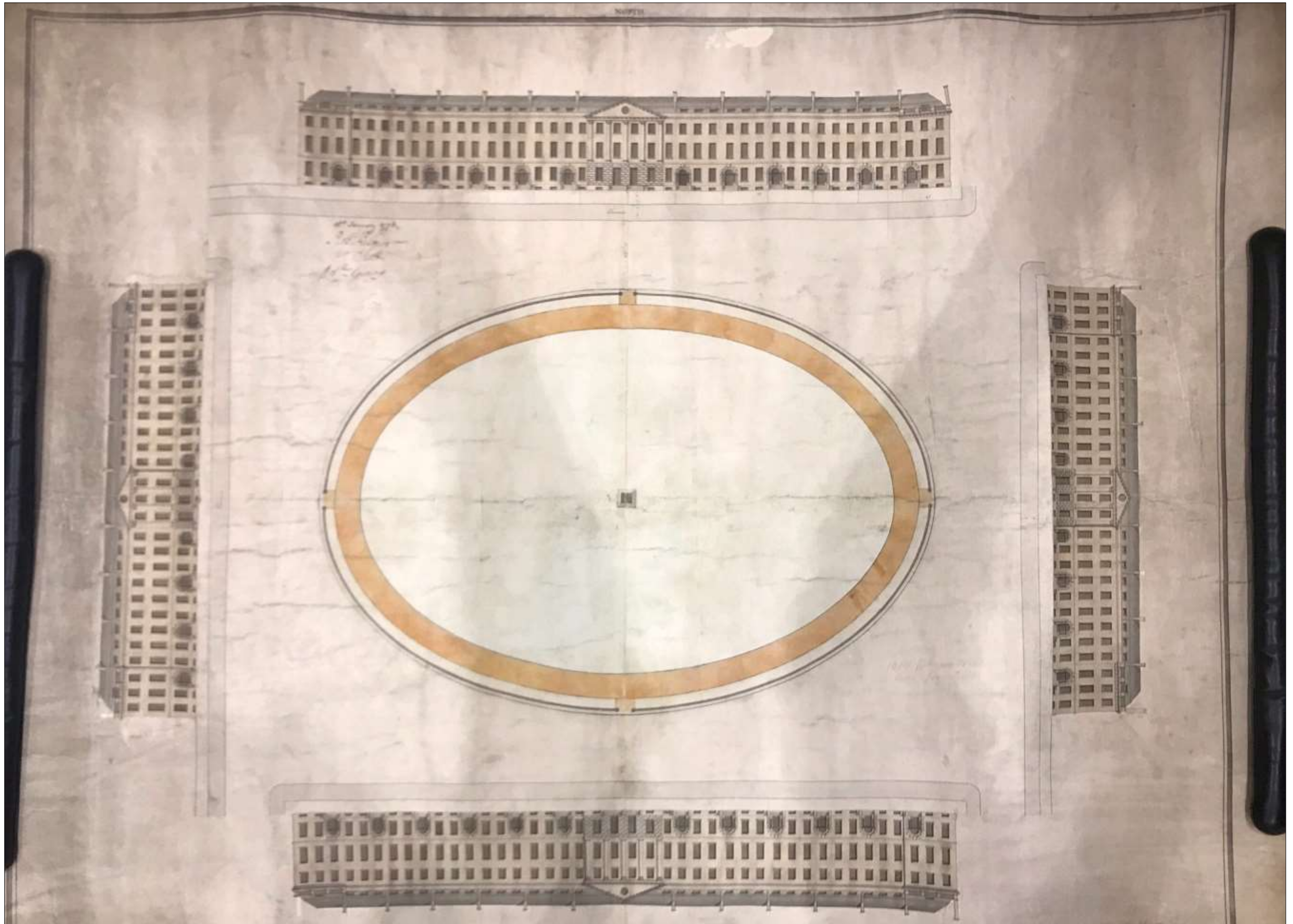


Figure 2: A plan of 1776, held by The Bedford Estates' archive (ref BI-P823), showing the proposed Bedford Square layout plan, including the four elevations.

PART II: Assessment of significance

pediments in the Ionic order, those to the north and south having five pilasters, and those to the east and west, four. The western house, being smaller, does not have the additional walling extending beyond the pilasters. The houses at the ends of each block have balustrades above the main cornice and, generally, the windows are ornamented with iron balconies at the first floor level.

23. The round-headed entrance doorways, other than those to the central houses, are rusticated in Coad's artificial stone, and enclose a variety of fanlights.
24. Turning then to 19 Bedford Square, a plan of 1795 published in *Bedford Square: An Architectural Study* [ibid] (**Fig 3**) shows the house with a small closet wing to the NE, and with a deeper mews building than most of the other houses (No. 21 being a notable exception). This must be the original arrangement and the outbuilding features, as noted in *Bedford Square: An Architectural Study*, Coade stone enrichment (**Photo 4** on page 18). The rear building to No. 21 likewise appears to be a largely unaltered original structure, and a remarkable survivor.

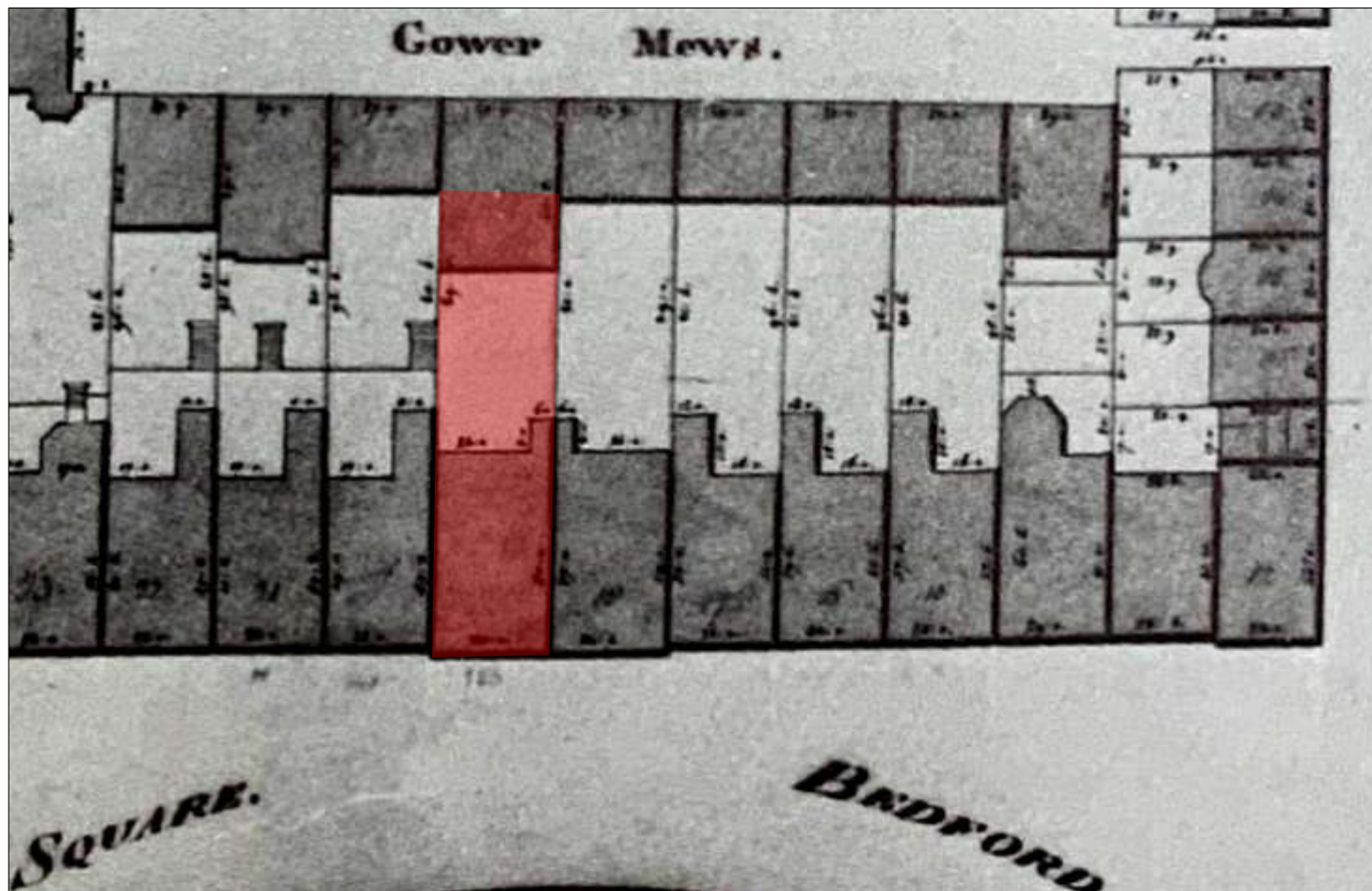


Figure 3: A plan of 1795, published in *Bedford Square: An Architectural Study*.

25. The 1875 Ordnance Survey map (**Figure 4**) shows a larger closet wing to 19 Bedford Square, but otherwise a similar situation.



Figure 4: Extract of the 1875 Ordnance Survey map, with the application site shown in red.

PART II: Assessment of significance

26. The 1896 Ordnance Survey map (**Figure 3**) shows no notable changes to the application site, only the removal of the NE part of the enlarged closet wing recorded on the 1875 map, leaving just the central projection of it.
27. The 1916 Ordnance Survey map (**Figure 6**) shows a similar arrangement.
28. An undated, c. late 19th or early 20th century basement plan (**Figure 7**) is the earliest sourced plan for the building, and it probably reflects the original basement plan, with three heated rooms: two to the front, separated by a passage, and one to the rear.

29. The Bedford Estates' archive holds a plan for a Building License plan, dated 1920 (ref. LE-LIC4-48), which shows proposed works at that time (**Figure 8**), and there is an accompanying specification that records other works, such as refurbishment of damaged mantelpieces. By this time the central structure, between the original front house and the original rear structure, had been added (there was also a lean-to attached to it at the basement level) and is shown as existing, which gives an approximate date for this structure between the time of 1916 Ordnance Survey map and 1920 (the Ordnance Survey map may have been surveyed earlier). Of note are the general layout of the structures (the house probably reflecting a broadly original layout), changes to the third floor of the house, and the integration of the added central structure with the original rear structure at ground level.

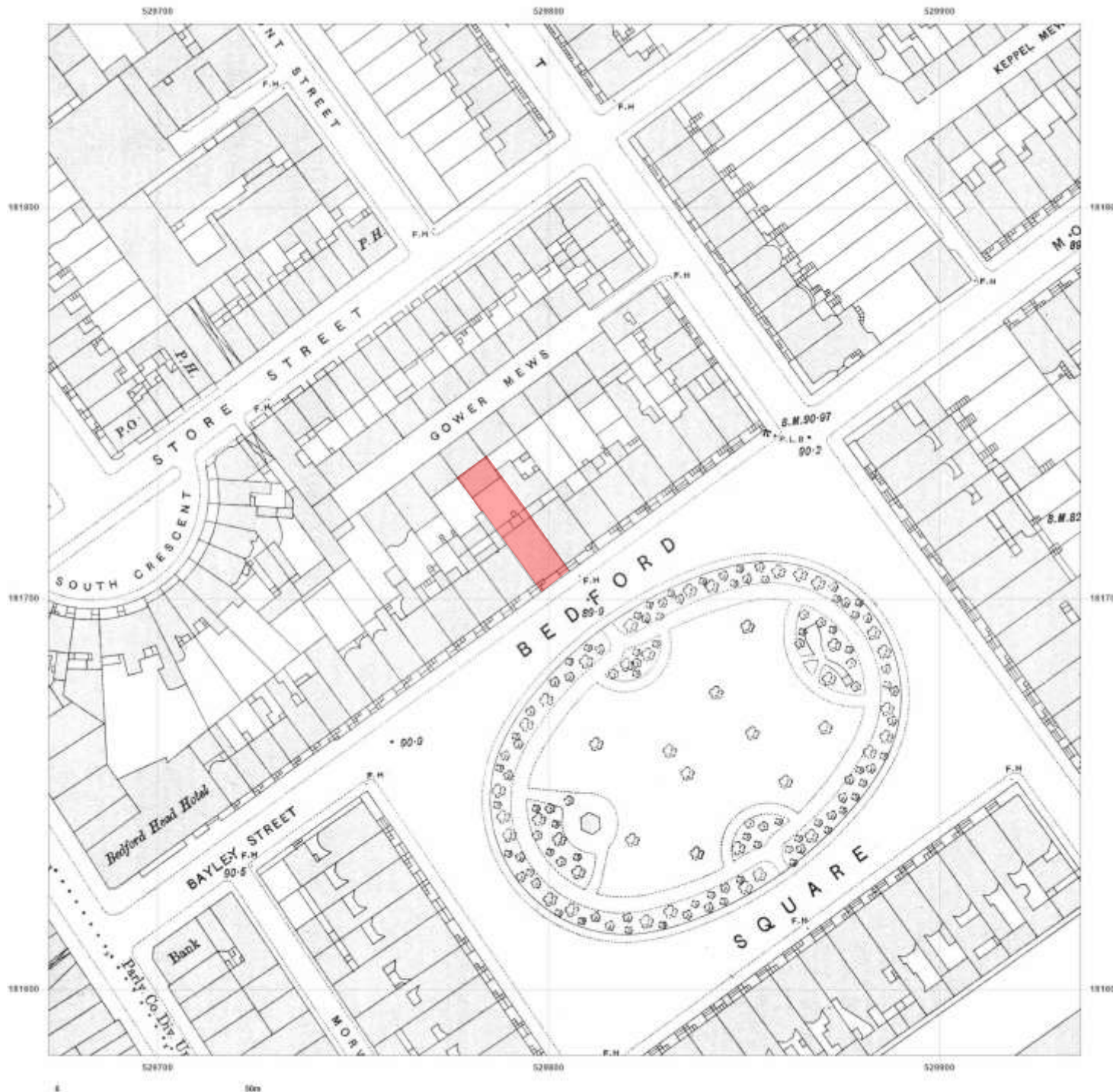


Figure 5: Extract of the 1896 Ordnance Survey map, with the application site shown in red.

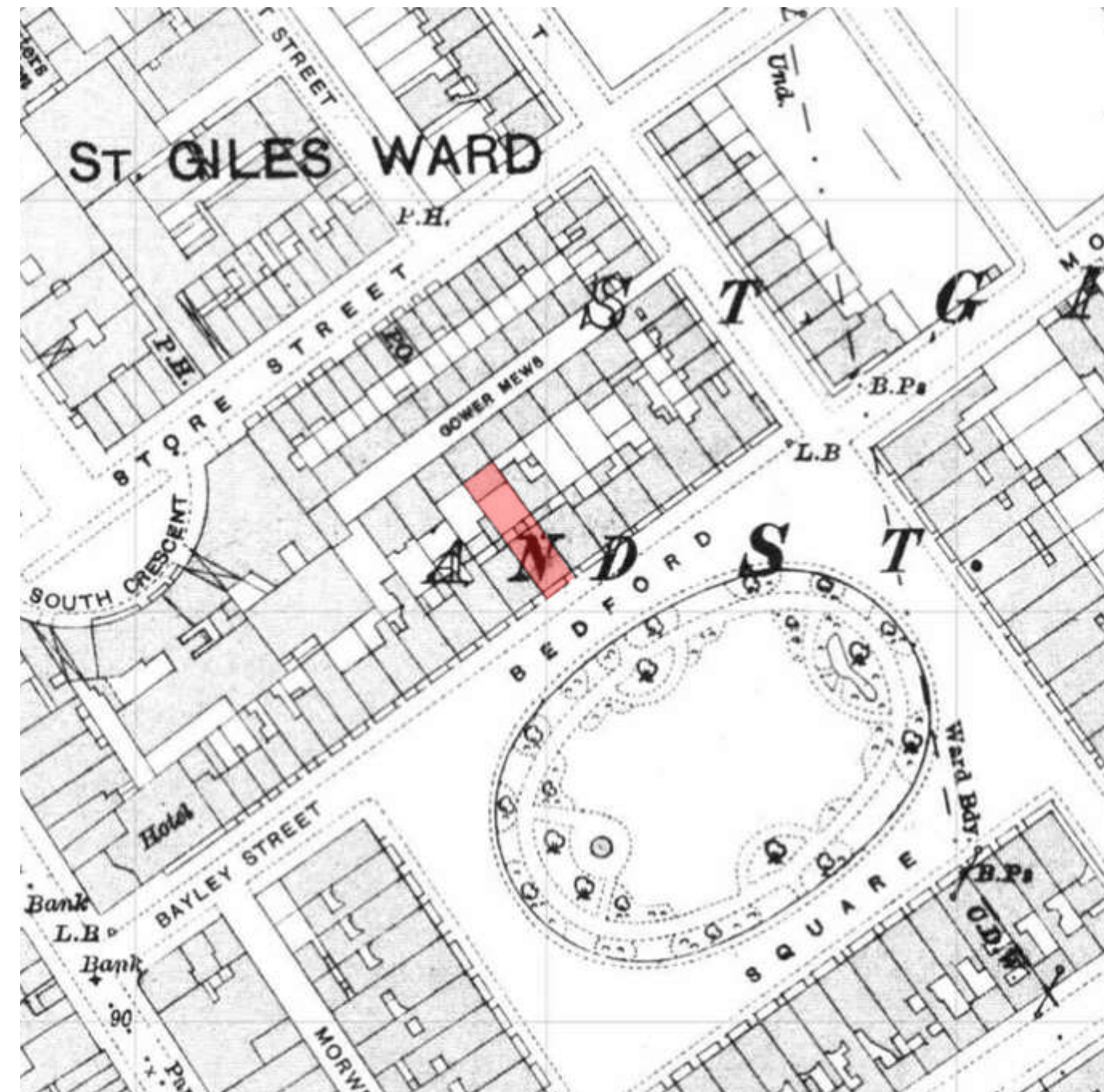


Figure 6: Extract of the 1916 Ordnance Survey map, with the application site shown in red.

PART II: Assessment of significance

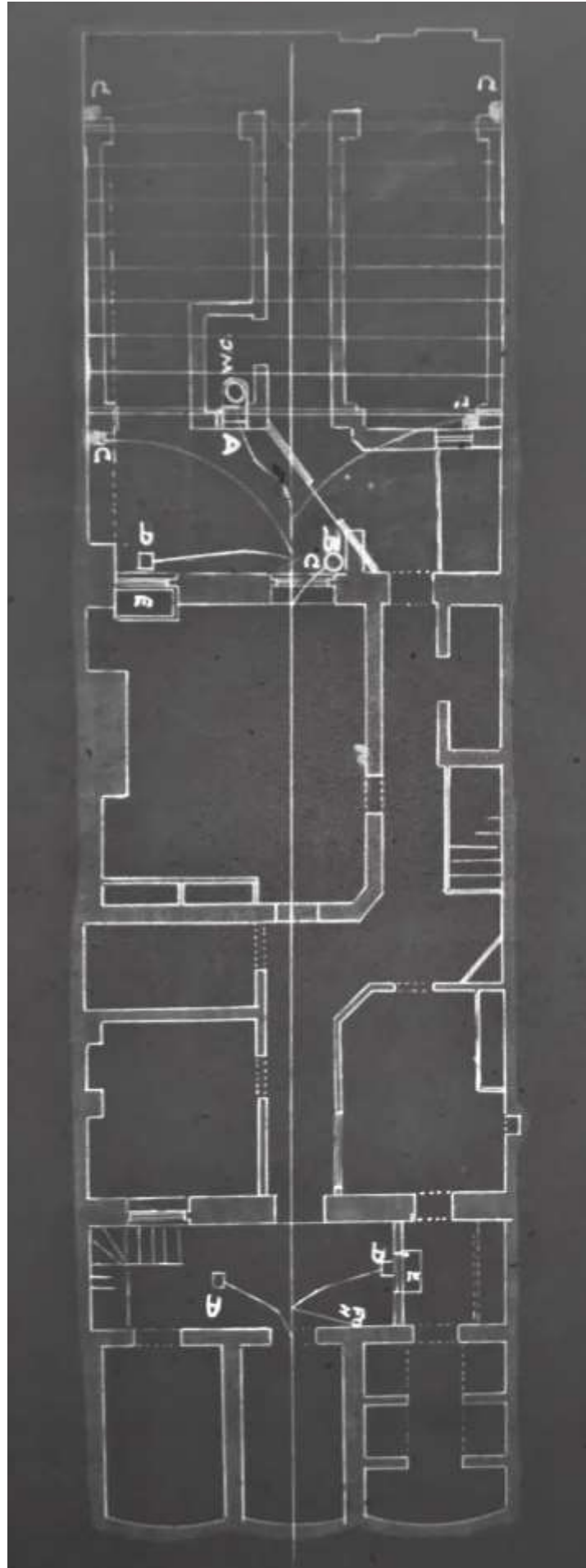


Figure 7: An undated c. late C19 or early C20 basement plan.



Figure 8: 1920 Building License plan, held by The Bedford Estates' archive (ref LE-LIC4-48), showing the proposed changes to 19 Bedford Square.

PART II: Assessment of significance



Figure 9: A 1934 photo showing the NW side of Bedford Square.



Figure 10: A 1934 photo showing the NW side of Bedford Square.

30. A 1934 photo, showing the NW side of Bedford Square (**Figure 9**) records a generally unchanged façade to the block, as does a photo of 1956 (**Figure 10**) and sketch of 1952.
31. The Bedford Estates' archive holds a plan showing proposed alterations to 19 Bedford Square (by Christian Doll), dated 1945 (**Figure 12**). By this time the changes shown on the 1920 plan appear to have been implemented, and the proposals were associated with an institutional use of the building, a change from the residential use in 1920.
32. The London County Council bomb damage map (not reproduced) does not record any damage to this part of Bedford Square. The 1951 Ordnance Survey map (**Figure 10**) shows the central structure, between the original front house and the original rear structure, for the first time.

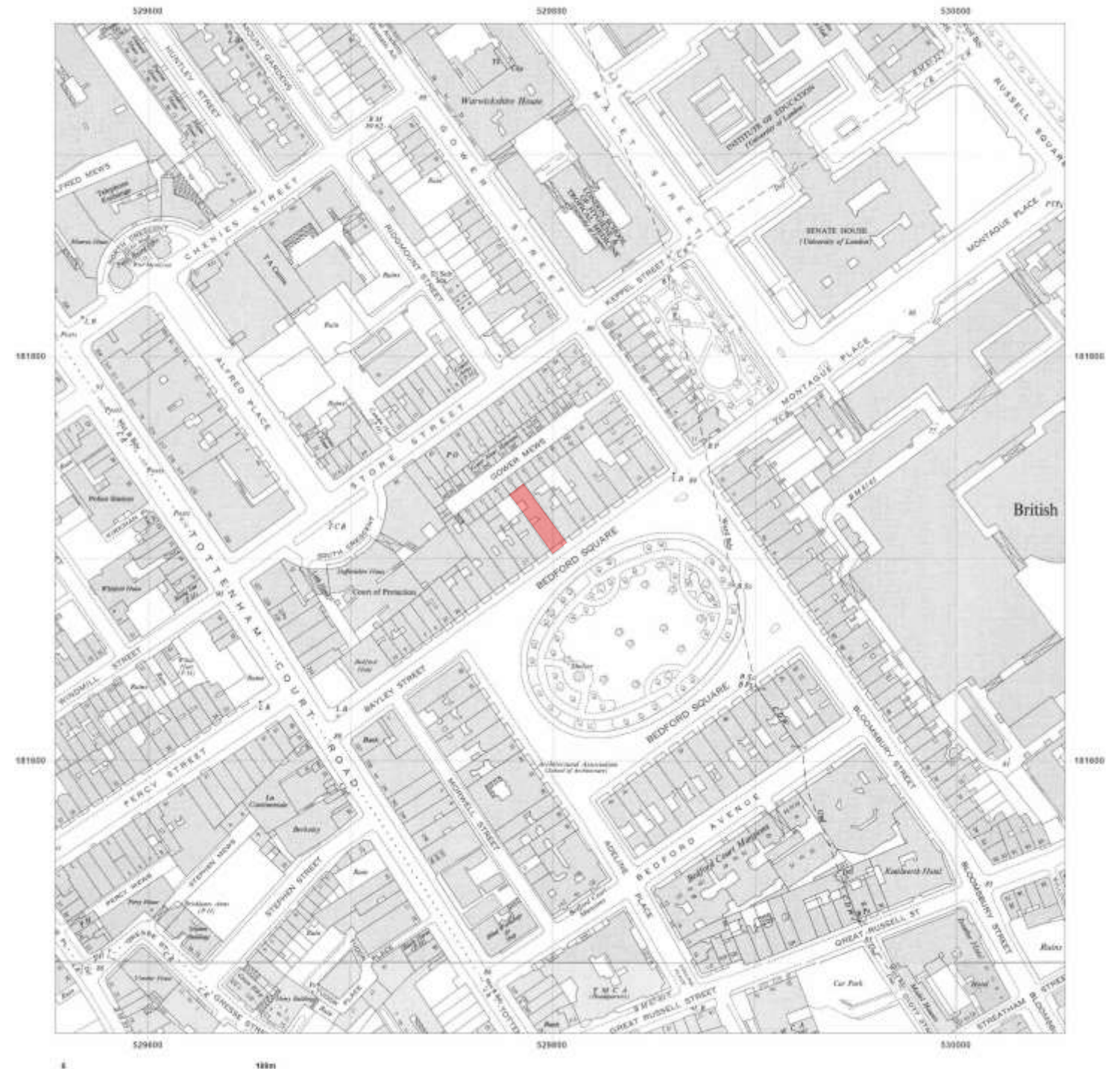


Figure 11: Extract of the 1875 Ordnance Survey map, with the application site shown in red.

PART II: Assessment of significance

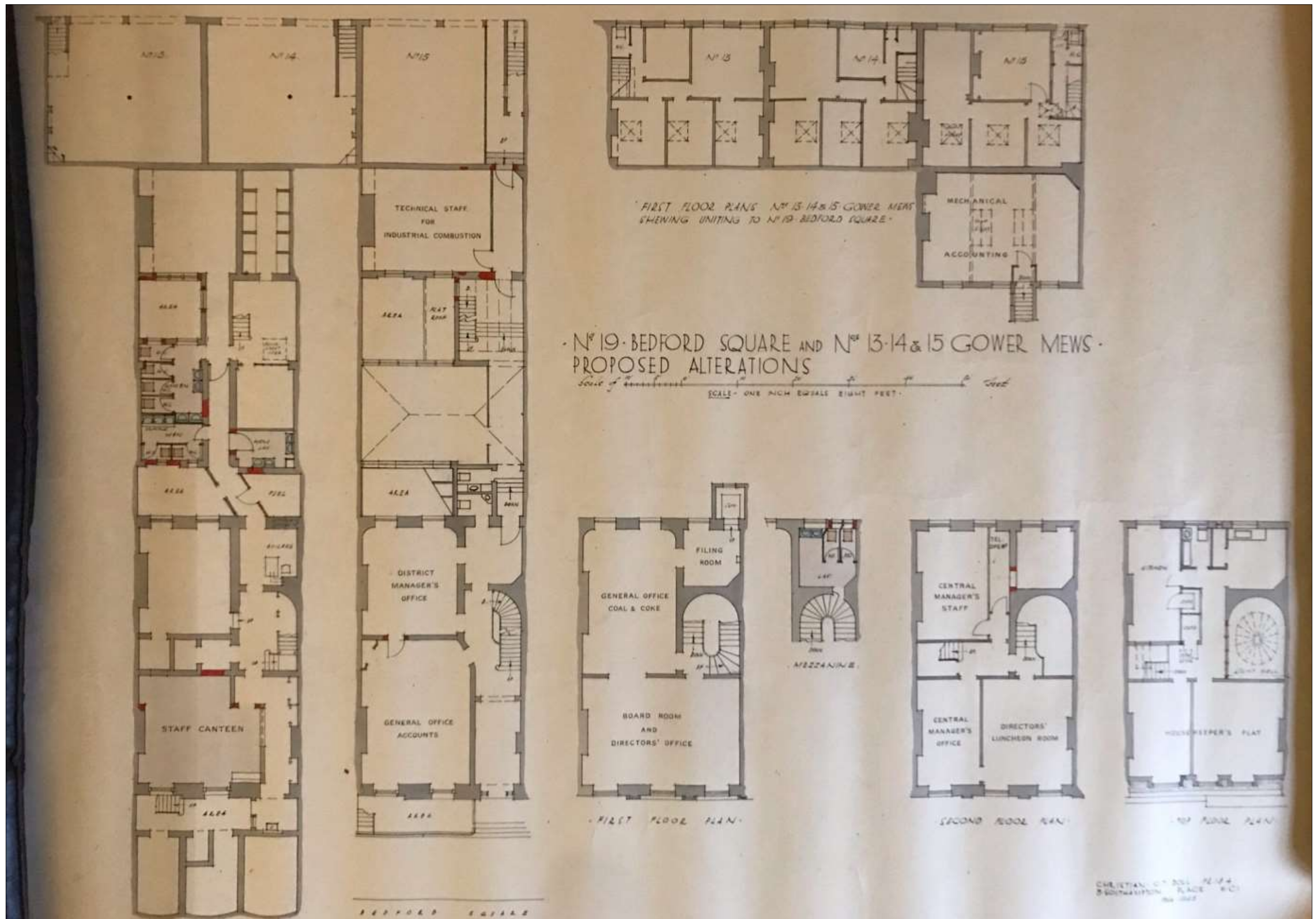


Figure 12: Proposed alterations to 19 Bedford Square (by Christian Doll), 1945, held by The Bedford Estates' archive (ref BI-PR389).

PART II: Assessment of significance

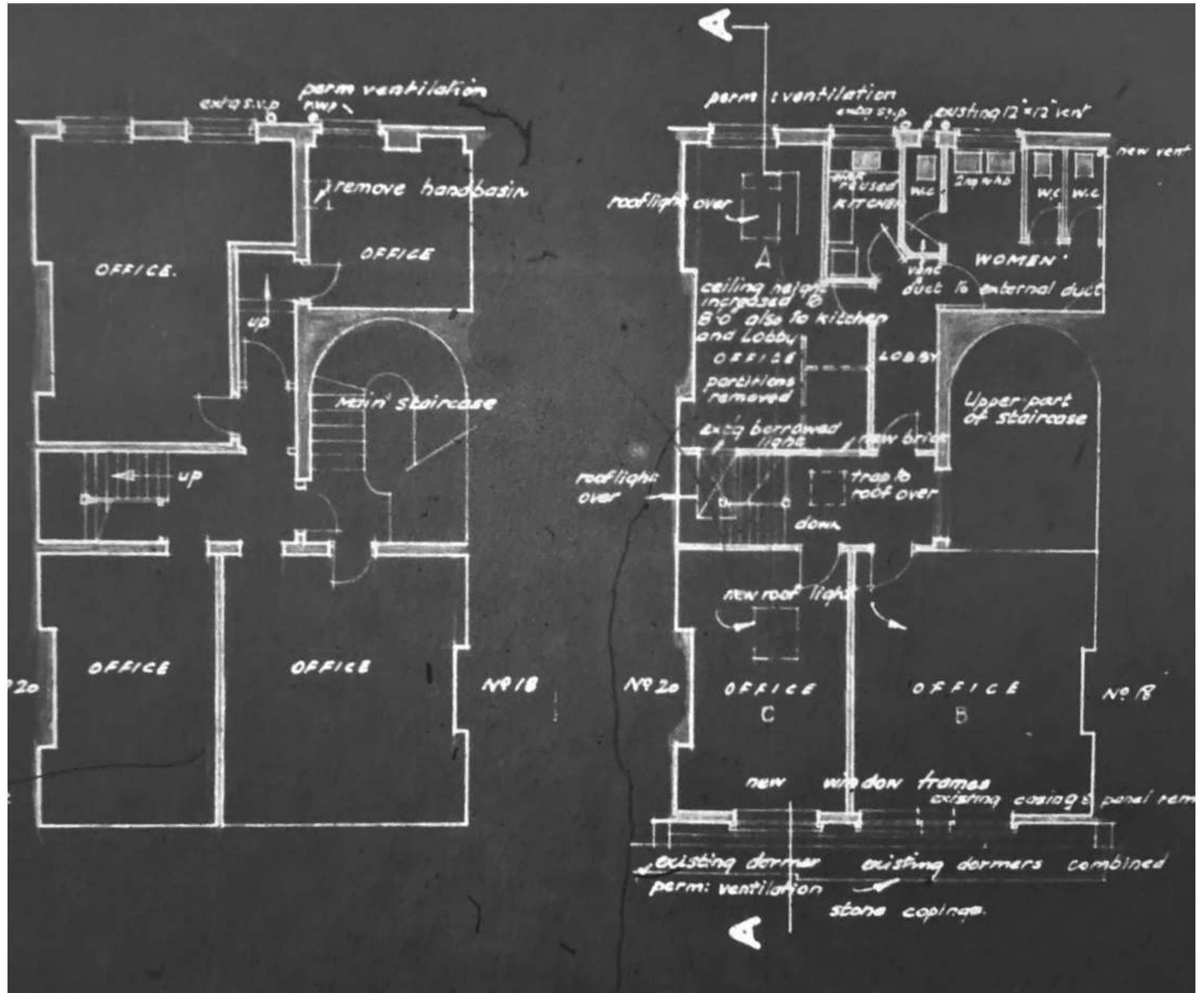
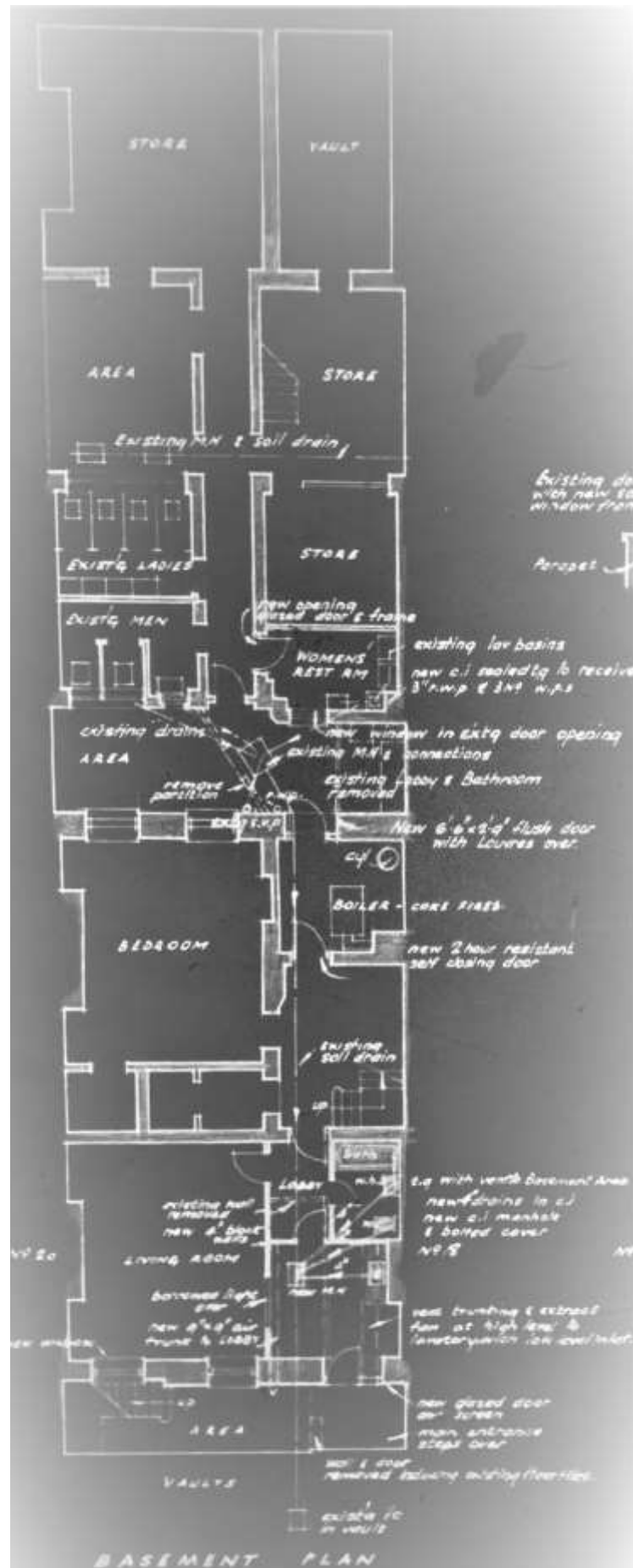


Figure 13: A basement plan of proposed alterations to 19 Bedford Square, 1961.

Figure 14: Second and third floor plans of proposed alterations to 19 Bedford Square, 1961.

PART II: Assessment of significance

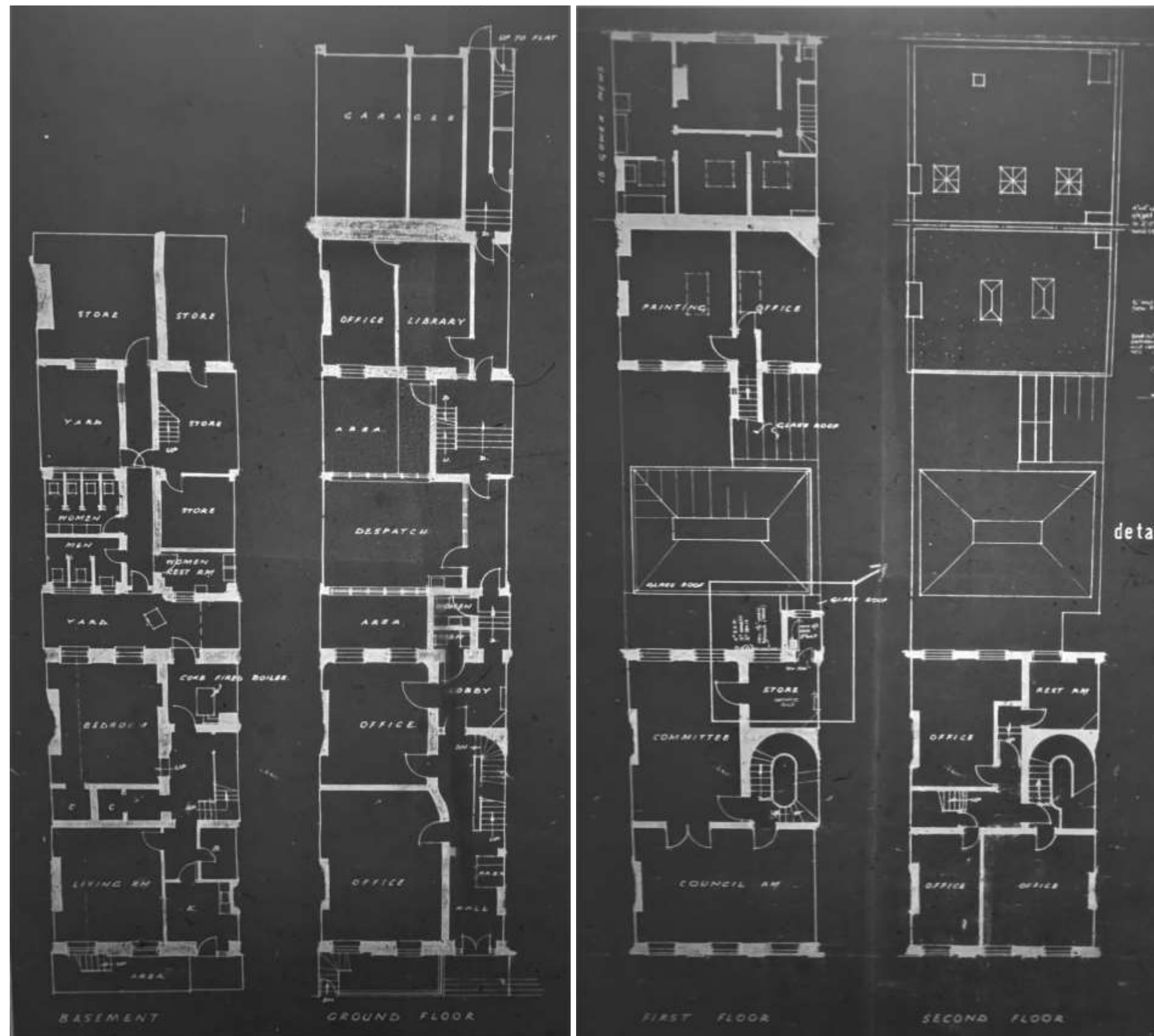


Figure 15: A set of floor plans 19 Bedford Square, 1966.

33. **Figures 13 & 14** on the previous page show proposed changes in 1961, which appear to show some, if not all, of the 1945 changes were implemented. By this time there appears to have been living accommodation in the basement (a bedroom and living room), with offices elsewhere.
34. **Figure 15** shows a set of plans associated with very minor changes to the first floor of the closet wing. This appears to show the 1961 changes were implemented.
35. The Bedford Estates' archive holds a schematic plan showing the basement and ground floors of 19 Bedford Square (**Figure 16**) and this broadly reflects the present arrangement, though there have been a few deviations since that time.

PART II: Assessment of significance

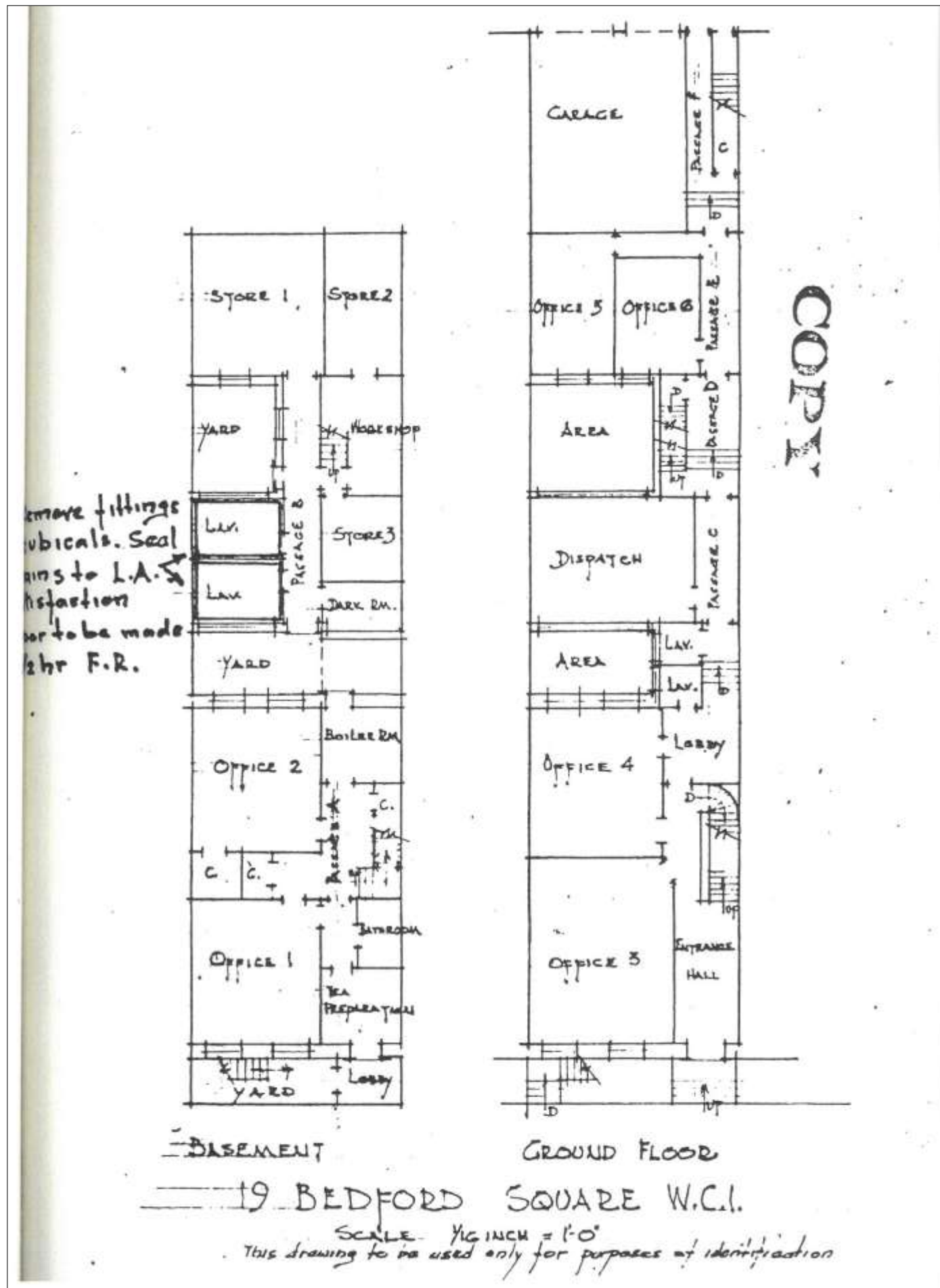


Figure 16: Ground and basement floor plans of 19 Bedford Square, 1983.

Assessment of significance

36. According Historic England's National Heritage List, the terrace at 12-27 Bedford Square, along with the attached railings, was first listed on 24 October 1951 and the list description was last amended on 11 January 1999. The descriptive text from the list entry is quoted in full below:

"Symmetrical terrace of 16 houses forming the north side of a square. 1776-1781. Mostly built by W Scott and R Grews; probably designed by either Thomas Leverton or Robert Palmer; for the Bedford Estate. Yellow stock brick with evidence on most of the houses of tuck pointing. Plain stucco band at 1st floor level. The 2 centre houses, Nos 18 & 19, are stuccoed. Slate mansard roofs with dormers and tall slab chimney-stacks. EXTERIOR: 3 storeys, attics and basements. 3 windows each. Recessed round-arched entrances with Coade stone vermiculated intermittent voussoirs and bands; mask keystones. Enriched impost bands and cornice-heads to doors. Side lights to panelled doors, some 2-leaf.



Figure 17: Frontal view of round and basement floor plans of 18 & 19 Bedford Square, c. 1998 (from Pevsner [ibid]).

PART II: Assessment of significance

Fanlights, mostly radial patterned. Gauged brick flat arches to recessed sashes, most with glazing bars. The following have blind boxes: Nos 16-19, No.20 to 1st floor only, Nos 21 and 25. The following have cast-iron balconies to 1st floor windows: Nos 12-15, 18-21, 23-25. No.12 has a good early C19 cast-iron balcony with round-arched trellis and tented canopy. Cornice and parapets, Nos 12 & 27 having balustraded parapets. INTERIORS not inspected but noted to contain original stone stairs with cast and wrought-iron balusters of various scroll designs, decoration and features; special features as mentioned: No.12: 5 window return to Gower Street, some blind, plus single storey extension. The doorway is stucco, not Coade stone. No.13: Leverton's own house, occupied in 1782 but he did not settle here until 1795. Stucco doorway, not Coade stone. Rear elevation with canted bay to lower 3 floors and cast-iron balconies. INTERIOR: stair replaced by a timber version late C19. 2 fine plaster ceilings. No.14: rear elevation with full height canted bay. Plasterwork friezes and ceilings. Some curved doors. No.17: plaster ceiling. Nos 18 & 19: rusticated ground floor; 5 Ionic pilasters rise through the 1st and 2nd storeys to support a frieze with roundels above each pilaster, and pediment with delicate swag and roundel enrichment on the tympanum. At 2nd floor level a continuous enriched band running behind the pilasters. INTERIORS with curved staircases; No.18 with original cellar including a storage cupboard. Attached to and facing the rear of No.19, a finely proportioned contemporary 2 storey and basement stuccoed building. 3 windows. Round-arched ground floor openings; windows set in architraved Coade stone surrounds with guilloche impost bands and female head keystones. 1st floor palm leaf string course. A rare survival of this kind of building attached to the rear wall of the coach-houses. No.21: screens and a plaster ceiling. Attached to and facing the rear, a well detailed contemporary 2 storey brick building. 3 windows. Arcaded ground floor with stucco impost bands. Entrance with radial patterned fanlight. Gauged brick flat arches to all sashes. Brick mutule cornice which continues around the pediment containing a blind oeil-de-boeuf. A rare urban survival of an ancillary building of the period. No.23: panelled doors and a plaster ceiling. No.24: rear elevation with canted bay to lower 3 floors. Plaster ceilings and panels. No.25: rear elevation with full height bow and full height half-canted closet. Wood carving and plaster ceilings, one originally with painted panels. No.26: plasterwork and closet room behind the stairs. No.27: original basement door with interesting metalwork. Some houses with original lead rainwater heads and pipes. SUBSIDIARY FEATURES: attached cast-iron railings to areas with urn or torch-flambe finials. No.17 with a wrought-iron lamp bracket and snuffer. Most houses with good wrought-iron foot scrapers. HISTORICAL NOTE: the houses in Bedford Square form a most important and complete example of C18 town planning. Built as a speculation, it is not clear who designed all the houses. Leverton was a country house architect and may have been involved with only the grander houses; he lived at No.13. Palmer was the Bedford Estate surveyor and may be 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. No.22 was the residence of Sir J Forbes Robertson, actor (plaque). (Byrne A: Bedford Square, An architectural study: London: -1990)."

37. Although 12-27 Bedford Square is a terrace of clear inherent significance, the significance of this terrace cannot be severed from the whole of Bedford Square, of which it forms a key component, and in turn 18 & 19 Bedford Square form a key component at the centrepiece of the terrace (**Fig 17**).

38. Bedford Square is the centrepiece of the Bedford Estate's planned development which includes a series of interlinked streets and spaces and it is a major focal point, both along Gower Street and within the wider Bloomsbury area. The square is a virtually intact, exemplary and well-preserved piece of late 18th century town planning, consisting of terraced housing built speculatively by a number of different builders to a plan produced by the Bedford Estate. In *Bedford Square: An Architectural Study* [ibid], the square is described as 'perfect' (though with some caveats) and an achievement that had not been replicated, before or after it was built. Furthermore, a sizeable number of original streetscape elements remain (many of which are grade II listed). The oval private gardens in the centre of the square is included in the Historic England Register of Parks and Gardens of Special Historic Interest in Greater London, at grade II*. Together, these make for a highly significant townscape.
39. As a starting point, grade I buildings are considered to be of exceptional interest and comprise the top tier of listed buildings; only 2.5% of all listed buildings are grade I. In NPPF terms, it is a heritage asset of the highest significance. There can be no doubt that the terrace at 12-27 Bedford Square (and the others, all listed grade I) represents one of the most significant Georgian developments in the country and deserves its grade I listed status, placing it in a small proportion the most significant buildings in England.
40. The terraces comprise three principal storeys with a basement and attic level. The frontages are of particular note, because they were designed as a whole in a neoclassical style to give a sense of architectural unity and harmony to the square. The facades were



Photo 1: 12-27 Bedford Square has clear inherent significance and it forms a key component of Bedford Square. In turn 18 & 19 Bedford Square form a key component at the centrepiece of the terrace.

PART II: Assessment of significance

constructed in yellow stock brick with tuck pointing, now heavily soot-stained. Each of the four terraces has a central, stuccoed pediment as a centrepiece, with rusticated bases. The doorways have distinctive intermittent voussiors of Coade stone and each keystone is decorated with a face.

41. The terrace frontages have a strong uniformity of scale, design, materials and proportion and share neo-classical architectural elements. They are of three or four storeys with mansard attic storeys, raised on basements, with original iron railings around basement areas. The blocks maintain a continuous parapet line and banding at first floor level, coinciding with decorative iron balconies to first-floor windows of the piano nobile.



Photo 2: A view of the rear outbuilding and the roof of the later added central building with link into the rear building.

42. 19 Bedford Square includes the 'building attached to the rear wall of the coach-house' as the list description describes it, which can be seen at **Photo 2**. Although a rare survivor and a very fine building, with good Coade detailing (**Photo 4**), it has lost its roof and has been attached to the later added central building, and in turn to the main house, in a very crude and most unfortunate way (**Photo 5**—this appears to have been part of the c. 1920s work, though the link has been reworked and it now has a modern appearance). It was at this time that the arched top sashes were also replaced (**Photo 5**), and internally the windows have suffered a loss of their surrounding joinery. Internally, this rear building has been equally heavily altered, with a new staircase inserted, along with WCs etc., and there is little now that can be said to have much interest here.
43. The courtyard between it and the added central lanterned structure is now filled with condenser units, which can be seen on **Photo 3**.
44. The central lanterned structure that was added to the rear garden in the early 20th century is of very limited interest and arguably detracts a good deal from the significance of the house, though conversely also illustrating part of its evolutionary narrative.
45. Returning to the main house, the basement is rather plain, as might be expected, though with retained doors of simple design and matching doorcases, probably original to the front main house, though in some cases evidently moved to correspond with changes to the plan form. The front rooms have been compartmentalised, something which started in the early 20th century and which has culminated in the lightweight modern partitions seen today. These are plainly modern and non-original. There is a chimneypiece to the rear room, though fitted with a later grate (this can also be seen elsewhere; judging from the style there seems to have been an Edwardian upgrade of the building, when these were added).



Photo 3: The rear courtyard, now filled with condenser units.

PART II: Assessment of significance



Photo 4: The arched windows to the rear outbuilding with Coade dressings.



Photo 5: The crude way in which the link crashes into the rear outbuilding.

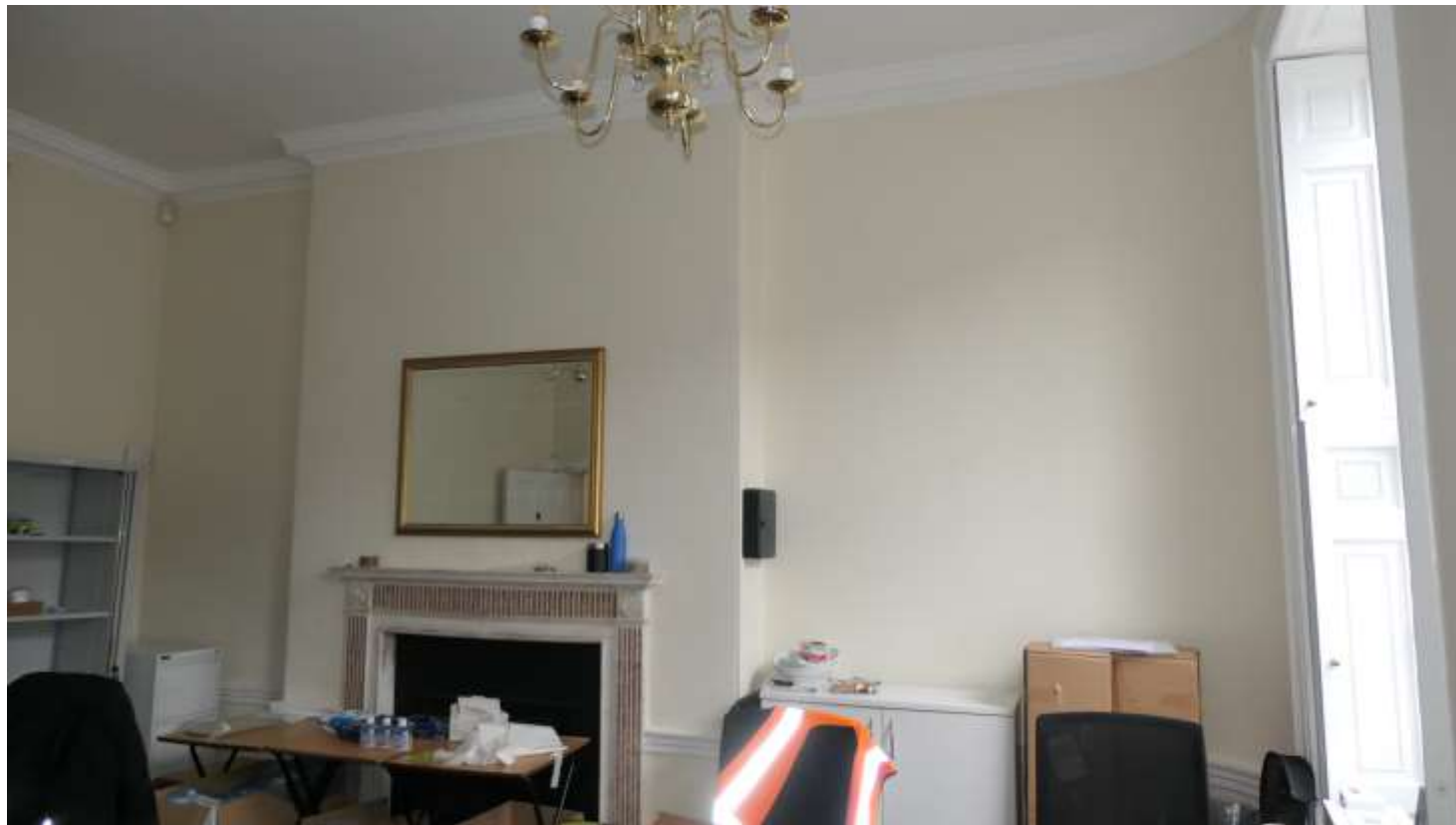


Photo 6: Good detailing to the ground floor rooms (the rear room pictured).



Photo 7: The front room on the piano nobile.

PART II: Assessment of significance



Photo 8: The duct in the basement front room.



Photo 9: A detail of the cantilevered stone staircase with fine wrought S-scroll balustrade.

PART II: Assessment of significance

46. A duct now exits one of the front windows in a most unfortunate way (**Photo 8**), and it appears that the ceiling has been dropped, probably to conceal services, though there do not appear to have been cornicing to the basement (none has survived, in any event). The staircase to the basement is crude, but original, though it appears from a crude truncation of the timber handrail that there would have been a timber handrail that has been lost (**Photo 10**).
47. The ground and first floors have retained their general original plan forms and a good deal of detailing, in the form of joinery (though some joinery has been lost) and a very elegant staircase (**Photo 9**). Principal rooms on these floors are illustrated at **Photos 6 & 7**.
48. The second floor has box cornices, good joinery and chimneypieces, though again with later grates (**Photo 11**). As may be expected, the garret or mansard rooms are plain, though there are old doorcases and doors, though repositioned in places, as show on the historic drawings and specifications. The plain secondary staircase is in place (the original elevations of 1776 do not show front dormers to the mansards, and these must have been added later) but there is a greater degree of compartmentalisation of the rear room, inserted in c. 1920 (**Figure 7**) but reconfigured since then.
49. Overall, the interiors feature some good detailing to the principal floors and have survived relatively well, but despite a few flourishes here and there (e.g. the staircase and the Adamesque chimneypieces), the interior is for the most relatively plain and not outstanding in terms of detailing or features. Nevertheless, the plan form has remained relatively intact on the ground to second floors, with at least some legibility elsewhere. The original rear building is a remarkable survivor, though sadly altered in a rather heavy handed way and largely obscured by the unremarkable early 20th century two storey courtyard building.



Photo 11: A second floor front room.



Photo 10: A crude truncation of the handrail to the basement.



Photo 12: A front room in the mansard.

PART III: Impact assessment



PART III: Impact assessment

Summary overview of the proposed development

50. The proposed changes are summarised, floor-by-floor, below and then considered in turn:

Basement:

- i. External rear courtyard: removal of condenser units and new (reinstated) partition below link to the rear outbuilding.
- ii. External front: removal of duct exiting through a pane in the original front light well window and removal of steel grille to window.
- iii. Removal of partitions and modern fittings within the early 20th century central courtyard building (these are non-original to the early 20th century structure).
- iv. Removal of modern cupboards and ducts to front room.
- v. Removal of modern partitions to the front room and reinstatement of a doorway off the stairs hall.
- vi. Reinstatement of a timber handrail where missing.

Ground floor:

- vii. Remodelling of the later altered stairs within the early 20th century central courtyard building (these are non-original to the early 20th century structure).
- viii. Refurbishment of the main room in the early 20th century central courtyard building (involving the removal/replacement of fittings that are non-original to the early 20th century structure).
- ix. Removal of non-original (modern) toilets and associated partitions within the rear outbuilding, as well as the modern cornice that overlaps the windows heads.
- x. Reinstatement of the top sashes with radial glazing bars to the curved heads of the rear outbuilding.

First floor:

- xi. Remodelling of the little mezzanine WC off the stairs (created c. 1920 and remodelled successively).

Second floor:

- xii. Removal of non-original (modern) partition within the rear room.

Third floor:

- xiii. Removal of non-original partitions from the larger rear room and changed location of the door.
- xiv. Reconfiguration of the WCs to the smaller rear room.

Roof:

- xv. Relocate condensers from rear courtyard to roof (no structural changes necessary).
- xvi. Replace slates and flashing that has reached the end of their lifespan.
- xvii. Replace non-original rooflight glazing with double glazed as elsewhere on the terrace.

Assessment

51. **Removal of condenser units from external rear courtyard and partition below link to the rear outbuilding.** The condenser units can be seen at **Photo 3** on page 17 and also below (**Photo 13**), which shows part of the area to be infilled in red. The removal of the condenser units would plainly be a material improvement, and the infilling below the link would cause no harm, as there are no discernible historic features in this location. There was historically a wall in this same location from at least 1920 (**Figure 8** on page 10) and it appears to have been in place until 1983 (**Figure 16** on page 15). If deemed necessary, a condition could be added to ensure the wall here abuts the fabric of the original outbuilding and that it would therefore be easily reversible.
52. **Removal of duct exiting through a pane in the original light well window and removal of steel grille to window (and surface mounted modern fixings to light well).** The duct into the original window can be seen at **Photo 8** on page 19. The removal of this unsightly and damaging intervention would materially enhance the historic character of the building, as would the removal of the steel grille and modern fixings.
53. **Removal of partitions and modern fittings within the early 20th century central courtyard building (these are non-original to the early 20th century structure).** The 1920 Building License plan (**Figure 8** on page 10) shows the partitions to be removed were not in place at that time. The removal of these unremarkable 20th century elements from a non-original early 20th century courtyard structure would leave the significance of the building unaffected.



Photo 13: The condenser units and part of the area to be infilled (highlighted in red).

PART III: Impact assessment

54. **Removal of modern partitions to the front basement room and reinstatement of a doorway off the stairs hall.** The undated, c. late 19th or early 20th century basement plan (**Figure 7** on page 10) and the subsequent plans all record the front of the basement to have been reconfigured, with no original partitions remaining. The undated, c. late 19th or early 20th century basement plan shows that the proposed doorway off the stairwell would be a reinstatement of a historic doorway that existed until 1983 (the doorway to be blocked was added by this time).
55. **Removal of modern cupboards and ducts to front room.** This can be seen on **Photo 15** and would be an obvious enhancement.
56. **Reinstatement of a timber handrail where missing.** The broken/truncated handrail can be seen at Photo 10 on page 20 and its reinstatement would be an enhancement.
57. **Remodelling of the later altered stairs at ground floor within the early 20th century central courtyard building (these are non-original to the early 20th century structure).** The reconfiguration of the non-original stairs within the early 20th century linking structure would leave the significance of the building unaffected.
58. **Refurbishment of the main room in the early 20th century central courtyard building (involving the removal/replacement of fittings that are non-original to the early 20th century structure).** This involves the removal and/or replacement of non-original modern items that would not affect the significance of the building.



Photo 14: The modern partitions to the front of the basement (view from front to back).



Photo 15: The modern cupboards and ducts to be removed from the front room of the basement.

PART III: Impact assessment



Photo 16: The modern cornice that crudely overlaps the windows heads within the rear outbuilding.

59. **Removal of non-original (modern) toilets and associated partitions ground floor within the rear outbuilding, as well as the modern cornice that overlaps the windows heads.** The toilets are modern (being absent on the 1966 plan at **Figure 15** on page 14). The reinstated partition would better reflect the historic room arrangement, and would be an improvement. The removal of the modern cornice that crudely overlaps the windows heads (**Photo 16**) would be an improvement.
60. **Reinstatement of the top sashes with radial glazing bars to the curved heads of the rear outbuilding.** The reinstatement of top sashes with glazing bars (see **Photo 16**) would be a considerable enhancement.
61. **Remodelling of the little ground/first floor mezzanine WC off the stairs (created c. 1920 and remodelled successively).** The toilets were first created c. 1920 but have been reconfigured since then (the 1945 drawing at **Figure 12** on page 12 shows a different arrangement). There is nothing historic or significant that would be affected.
62. **Removal of non-original (modern) partition within the second floor rear room.** The partition, which interferes with the original plan form and initially overlapped a rear window, was added between the 1920 and 1945 drawings. Its removal would beneficially reinstate the proportions of the rear room.
63. **Removal of non-original partitions from the larger third floor rear room and a changed location of the door off the stairwell.** The partitions were first proposed in 1920, but they have been altered successively. The 1920 drawing also records a doorway in the location where one is now proposed, so this would not affect any historic fabric, but a blocking of c. 1961 (see **Figure 14** on page 13). The resulting reinstatement of historic proportions to the room would enhance the significance of the building.
64. **Reconfiguration of the WCs to the smaller third floor rear room.** This reconfiguration of the WC partitions would be largely without effect.
65. **Relocate condensers from rear courtyard to roof (no structural changes necessary).** Many of the houses on Bedford Square have condensers on the roof valleys and this is not an unusual location for these. The roof is a logical location for the condensers And this would not affect the significance of the building. However, it would allow a great improvement at the rear courtyard, which they presently occupy.
66. **Replace slates and flashing that has reached the end of their lifespan.** This is necessary periodic renewal of the roof covering that would be done with matching materials (slate and traditional leadwork flashing) and it would leave the significance of the building unaffected.

PART IV: Conclusions

67. **Replace non-original rooflight glazing with double glazed as elsewhere on the terrace.** There is precedent for this, which would not affect the significance of the building.
68. This report has considered the significance of the listed building and presents a good understanding of its significance, which allows for an informed assessment of the potential effects of the proposals.
69. This detailed assessment has found that the proposed development would preserve and enhance the significance of the listed building. There would be improvements to the building, such as the removal of non-original and intrusive additions, and the reinstatement of original proportions and plan forms to some of the rooms. The proposed

APPENDIX 1: Legislation and Policy



Planning (Listed Buildings and Conservation Areas) Act 1990

CHAPTER 9

A Table showing the derivation of the provisions of this consolidation Act will be found at the end of the Act. The Table has no official status.

ARRANGEMENT OF SECTIONS

PART I

LISTED BUILDINGS

CHAPTER I

LISTING OF SPECIAL BUILDINGS

Section

1. Listing of buildings of special architectural or historic interest.
2. Publication of lists.
3. Temporary listing: building preservation notices.
4. Temporary listing in urgent cases.
5. Provisions applicable on lapse of building preservation notice.
6. Issue of certificate that building not intended to be listed.

CHAPTER II

AUTHORISATION OF WORKS AFFECTING LISTED BUILDINGS

Control of works in respect of listed buildings

7. Restriction on works affecting listed buildings.
8. Authorisation of works: listed building consent.
9. Offences.

Applications for listed building consent

10. Making of applications for listed building consent.
11. Certificates as to applicant's status etc.
12. Reference of certain applications to Secretary of State.
13. Duty to notify Secretary of State of applications.
14. Duty of London borough councils to notify Commission.
15. Directions concerning notification of applications etc.
16. Decision on application.

A



National Planning Policy Framework

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APPENDIX 1: Legislation and Policy

Legislation

1. Legislation relating to listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. For the purposes of this application, the relevant considerations are Sections 66 and 72 of the 1990 Act. Section 66(1) of the Act states:
"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall 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."
2. According to Section 72, in relation to conservation areas:
"In the exercise, with respect to any buildings or other land in a conservation area [...] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."
3. The Act does not require the preservation of listed buildings or conservation areas *per se*, which is confirmed by the *South Lakeland DC v Secretary of State for the Environment and another* (1992 House of Lords appeal), i.e. legislation *"does not in terms require that a development must perform a preserving or enhancing function."* Rather, it places a statutory duty on decision makers to ensure that the special interest of listed buildings or conservation areas is properly taken into account as material considerations when determining applications affecting their special interest, or the setting of listed buildings. Case law has established that the preservation of the setting of a listed building requires considerable importance and weight (i.e. the *Barnwell Manor* judgement) and that, generally, a decision-maker who has worked through the paragraphs of the NPPF in accordance with their terms will have complied with the statutory duty set out in the 1990 Act (i.e. the judgement in *Jones v Mordue & Others* [2015] EWCA Civ 1243).

The National Planning Policy Framework

4. The revised National Planning Policy Framework (the NPPF) was published in July 2021 and constitutes guidance for local planning authorities and decision makers. Applications for planning permission must be determined in accordance with the local development plan, unless it is silent or material considerations indicate otherwise. The NPPF is a material consideration.
5. Section 16 of the NPPF deals with conserving and enhancing the historic environment, in paragraphs 189 to 208. The NPPF places much emphasis on heritage 'significance', which it defines in Annex 2 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. Significance derives not only from a heritage asset's physical presence, but also from its setting."
6. Paragraph 189 of the NPPF states that heritage assets range from sites and buildings of local historic value to those of the highest significance. It goes on to state that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
7. Paragraph 190 encourages local planning authorities to prepare local plans that should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. One of the factors to be taken into account is 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 new development can make is another of these factors to be taken into account.
8. According to paragraph 194, local planning authorities should require applicants 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.
9. Paragraph 195 requires a similar approach from local authorities, who should identify and assess the particular significance of any heritage asset that may be affected by a proposal, taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
10. According to paragraph 197, a number of considerations should be taken into account in determining applications. The first is the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. The second is to recognise the positive contribution that conservation of heritage assets can make. The third reiterates the well-established concept that new development can also make a positive contribution to local character and distinctiveness.
11. According to paragraph 199, which applies specifically to designated heritage assets, great weight should be given to a heritage asset's conservation (the more important the asset, the greater the weight should be). This reflects the provisions of the 1990 Act in that it applies irrespective of whether it involves total loss, substantial harm, or less than substantial harm to significance.
12. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. It then deals with substantial harm to, or total loss of significance of, different types of designated heritage assets.
13. Paragraph 201 continues on the subject of substantial harm. Paragraph 202, on the other hand, deals with less than substantial harm. Harm in this category should be weighed against the public benefits of the proposal.
14. The National Planning Practice Guidance¹ (NPPG) describes public benefits as *"anything that delivers economic, social or environmental objectives"*.

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/why-is-significance-important-in-decision-taking/>

APPENDIX 1: Legislation and Policy

- 15. According to paragraph 206, local planning authorities should look for opportunities for new development within conservation areas, 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.
- 16. Paragraph 207 recognises that not all elements of a conservation area will necessarily contribute to its significance. The loss of a building (or other element) which makes a positive contribution to the significance of the conservation area should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole.

The Development Plan

- 17. The Development Plan is the London Plan (2021) and the Camden Local Plan (2017).
- 18. **The London Plan:** The London Plan 2021 deals with Design at Chapter 3. Policy D4 deals with delivering good design and states that the design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising appropriate analytical tools. The design quality of development should be retained through to completion by, amongst others, ensuring maximum detail appropriate for the design stage is provided
- 19. Policy HC1, entitled “*Heritage conservation and growth*” is the most relevant of the policies in Chapter 7. Parts A and B of the policy deal with strategic considerations/ requirements and these are not relevant to determining planning applications.
- 20. Part C deals with development proposals affecting heritage assets, and their settings. This part of Policy HC1 requires development proposals to conserve the significance of heritage assets, by being sympathetic to the assets’ significance and appreciation within their surroundings. The policy also requires the cumulative impacts of incremental change from development on heritage assets and their settings to be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.
- 21. Policy D2 “*Heritage*” of the Camden Local Plan deals with heritage and it is set out in part in the text box below:

D2 - Heritage

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.

Designated heritage assets

Designed [sic] heritage assets include conservation areas and listed buildings. 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.*

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.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. 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.*

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. 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.*

[...]