

# No. 22 Bedford Square London WC1B 3HH

## Heritage Statement



**Project:** No. 22 Bedford Square, London WC1B 3HH

**Client:** Chief

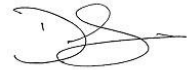
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## Abbreviations and Conventions used in the text

c.	circa		
CA	Conservation Area	LPA	Local Planning Authority
ha	hectares	m	metres
HA	Heritage Asset	NGR	National Grid Reference
HE	Historic England	NHLE	National Heritage List for England
HER	Historic Environment Record	NPPG	National Planning Practice Guidance
km	kilometres	NPPF	National Planning Policy Framework
LB	Listed Building	RPG	Registered Park and Garden
RN	Reference Number		

## Assumptions and Limitations

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

This report is also compiled using GLHER data accessed via Heritage Gateway online, on 04 May 2022.

## Compliance

This document has been prepared in accordance with the requirements stated within the National Planning Policy Framework (NPPF; (Ministry of Housing, Communities & Local Government, 2021) National Planning Practice Guidance (NPPG; Ministry of Housing, Communities & Local Government, 2019) and the Chartered Institute for Archaeologists' Standard and guidance for historic environment desk-based assessment, and Standard and guidance for commissioning work on, or providing consultancy advice on, archaeology and the historic environment (Chartered Institute for Archaeologists, December 2017)

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## 2.0 Introduction

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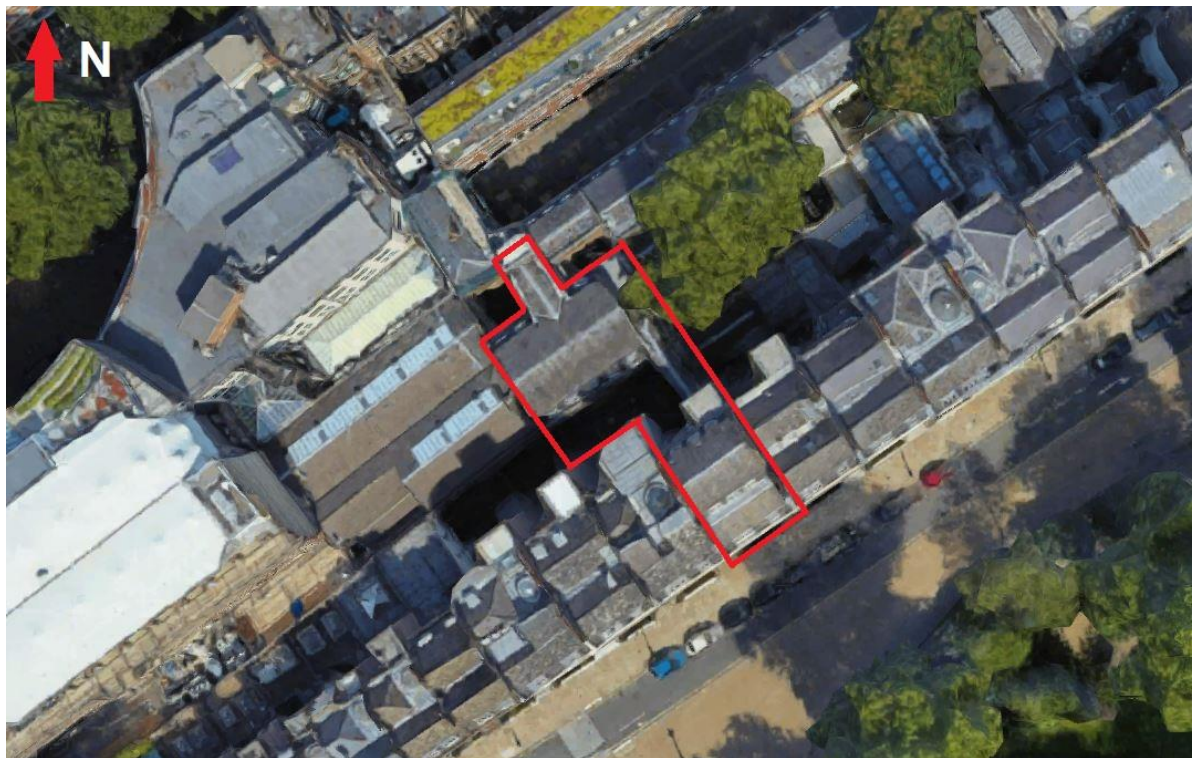
### 2.1 Project background

- 1.1.1. This Heritage Statement has been researched and prepared by Savills Heritage and Townscape to provide relevant and proportionate information to assess the significance of the historic building at No. 22 Bedford Square, London WC1B 3HH (hereafter known as 'the Site') located at NGR TQ 29781 81695, in order to set out the potential impact of the proposed works to accompany a listed building consent application. The Heritage Statement focuses on the key designated heritage assets of the Grade I listed No. 22 Bedford Square and the Bloomsbury Conservation Area: Sub Area 5 – Bedford Square/Gower Street, notably the significance of the assets and the impacts that the proposed scheme may have upon their significance.

### 2.2 The Site and the wider vicinity

- 2.2.1 The Site is located to the north west side of Bloomsbury Square, which delineates its south eastern boundary, being bound to the north west by No. 12 Gower Mews. The continued terrace of townhouses bound the Site to the north east and south west. The Site is situated within the London Borough of Camden (hereafter 'the Local Authority'). The Site consists of a three-storey brick townhouses with basement and mansard roof.
- 2.2.2 **Figure 1** indicates the location of the Site and its immediate setting:





**Figure 1.** Indicative location of the Site, outlined in red. The Site is Grade I listed, in part for its group value with nos. 12-27 Bloomsbury Square, and contributes to the overall composition of Bedford Square © Google

2.2.3 The Site is a Grade I listed building (NHLE number: 1244546), first designated on 24 October 1958 with a later listing amendment in January 1999. The heritage asset is designated in part for its group value with Nos. 12-27 Bloomsbury Square and attached railings, and contributes to the overall composition of Bedford Square. The Historic England List description is as follows:

*TQ2981NE BEDFORD SQUARE 798-1/99/77 (North side) 24/10/51 Nos.12-27 (Consecutive) and attached railings (Formerly Listed as: BEDFORD SQUARE Nos.1-54 (Consecutive))*

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I

*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. 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).*

There are further statutory listed buildings within proximity of the Site, including the neighbouring Grade I listed buildings at Nos. 12-27 Bloomsbury Square and attached railings to the north east and south west of the Site. However, the proposed works have been assessed to have no impact on these neighbouring built heritage assets and they have been scoped out of this report.

- 2.2.4 The Site is located within the Bloomsbury Conservation Area: Sub Area 5 – Bloomsbury Square/Russel Square/Tavistock Square, which was first designated in 1968 with subsequent boundary extensions, covering an area of approximately 160 hectares.
- 2.2.5 The Site is not identified as being within an Archaeological Priority Area.
- 2.2.6 Since the mid-20<sup>th</sup> century there have been a number of full planning permission and listed building consent applications submitted for internal and external alterations, including rebuilding of the rear link and mews buildings in connection with the use of the building as commercial space. An available full planning history is listed in **Appendix 1**.



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## 3.0 Methodology

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### 3.1 Aims, objectives and scope

3.1.1 Local planning authorities require an applicant to provide an assessment of the significance of any heritage assets affected by a development proposal, including any contribution made by their setting. This includes designated and non-designated heritage assets. The following terminology has been adopted within this assessment for classifying and discussing the historic environment:

- 1) A **heritage asset** is a building, monument, site, place, area or landscape identified as meriting consideration in planning decisions because of its heritage interest (NPPF, Annex 2 Glossary);
- 2) The **setting** of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed, can extend beyond the asset's curtilage and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2 Glossary);
- 3) **significance** (for heritage policy), as defined in the NPPF (Annex 2 Glossary) is used to describe the heritage interest of an asset to this and future generations. This interest may be archaeological, architectural, artistic or historic. Significance derives from not only a heritage asset's physical presence, but also from its setting.

3.1.2 Recent Historic England guidance introduced the concept of interests to assess the significance of heritage assets (Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12, 2019), with reference to the following criteria:

- 1) **Archaeological interest.** Deriving from the potential of a place to yield evidence about past human activity that is worthy of expert investigation.
- 2) **Historic interest.** An interest in past lives and events. It tends to be illustrative or associative. Providing a material record of the nation's past, it can also provide meaning for communities derived from their collective experience of a place and it can symbolise wider value such as faith or cultural identity.

- 3) **Architectural and artistic interest.** Interest form the design or general aesthetics of a place. Derived from conscious design or fortuitously through evolution. More specifically, it relates to the science of design, construction, craftsmanship and decoration. Artistic interest is an interest in other human skill, such as sculpture.

3.1.3 Recently revised national planning policy guidance (NPPG, July 2019) in relation to the historic environment provides a similar interpretation of assessing significance.

3.1.4 These criteria derive from previous Historic England guidance (Conservation Principles: Policies and Guidance (English Heritage, 2008)), which proposed values to assess heritage significance (Evidential, Historical, Aesthetic, Communal).

*Assessment of setting*

3.1.5 Historic England has issued Historic Environment Good Practice Advice in Planning guidance notes, of which *Good Practice Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (March 2015)* and *Good Practice Advice Note 3 (2<sup>nd</sup> Ed.) – The Setting of Heritage Assets (December 2017)* are relevant to the proposals at the proposed development site.

3.1.6 The Historic England Guidance advocates a systematic and staged approach to the assessment of the implications of development in terms of their effects on the settings of heritage assets.

3.1.7 **Step 1** of the approach is '*identifying the heritage assets affected and their settings*'. This initial step is carried out by undertaking documentary research, and assessing data sourced from the HER and national heritage datasets.

3.1.8 **Step 2** requires consideration of '*whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)*'. The guidance states that this stage of the assessment should first address the key attributes of the heritage asset itself and then consider: i) the physical surroundings of the asset, including its relationship with other heritage assets; ii) the way the asset is appreciated; and iii) the asset's associations and patterns of use.

3.1.9 **Step 3** involves '*Assessing the effect of the proposed development on the significance of the asset(s)*'. This stage of the assessment addresses the key attributes of the proposed development, such as its: i) Location and siting; ii) Form and appearance; iii) Additional effects; and iv) Permanence.

3.1.10 **Step 4** of the guidance should explore opportunities for ‘*maximising enhancement and minimising harm*’, while **Step 5** is to ‘*make and document the decision and monitor outcomes*’. For the purposes of this assessment, **Steps 1-4** of the process have been followed. **Step 5** is the duty of the Local Planning Authority and therefore not undertaken as part of this assessment.

*Historical and archaeological baseline*

3.1.11 Baseline conditions were established through consideration of the historic environment within the vicinity of the Site and a desk-based review of existing sources of publicly accessible primary and synthesised information, comprising:

- 1) National heritage datasets including The National Heritage List for England (NHLE), Images of England, and Britain from Above;
- 2) Heritage Gateway, accessed online 10 May 2022;
- 3) The Bloomsbury Conservation Area Appraisal and Management Strategy (London Borough of Camden), adopted 18 April 2011; and
- 4) Historic manuscripts and maps available online.

3.1.12 A site visit and walkover were undertaken on 23 May 2022 to inform the understanding of No. 22 Bedford Square (Photographs in **Appendix 3**), and those heritage assets within the vicinity which may be sensitive to the proposed scheme.

3.1.13 A bibliography of documentary, archive, and cartographic sources consulted is included in the **References** section of this report.

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## 4.0 Historic development

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### 4.1 Introduction

4.1.1 The following section provides a brief summary of the historical development of the Site and its environs, compiled from sources as listed in the References and drawing on previous studies of the Site.

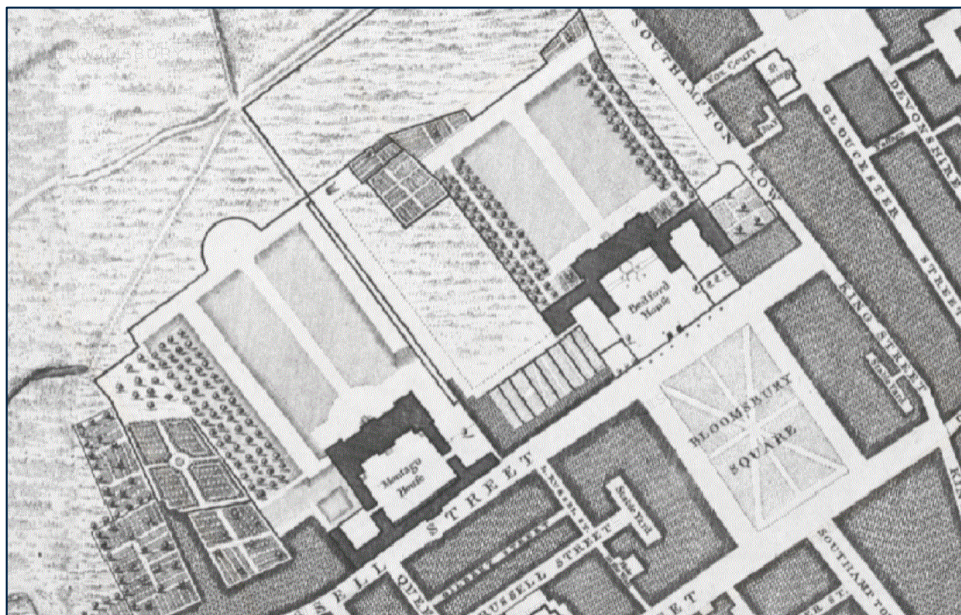
4.1.2 Understanding the history and context of the relevant heritage assets is important to establish their setting and the contribution that their setting makes to their significance. Historic England guidance on the setting of heritage assets advises that while this matter is primarily a visual assessment, there are other factors, such as historical associations and relationships that define settings and contribute to significance.

### 4.2 Historic development

4.2.1 The present building at No. 25 John's Mews is identified as being constructed in 1903, as denoted by the foundation stone inscribed with "These premises were erected by Henry Finch Esq., JP in AD 1903", and is Heritage assets – significance and setting

### 4.3 No. 22 Bedford Square (Grade I listed)

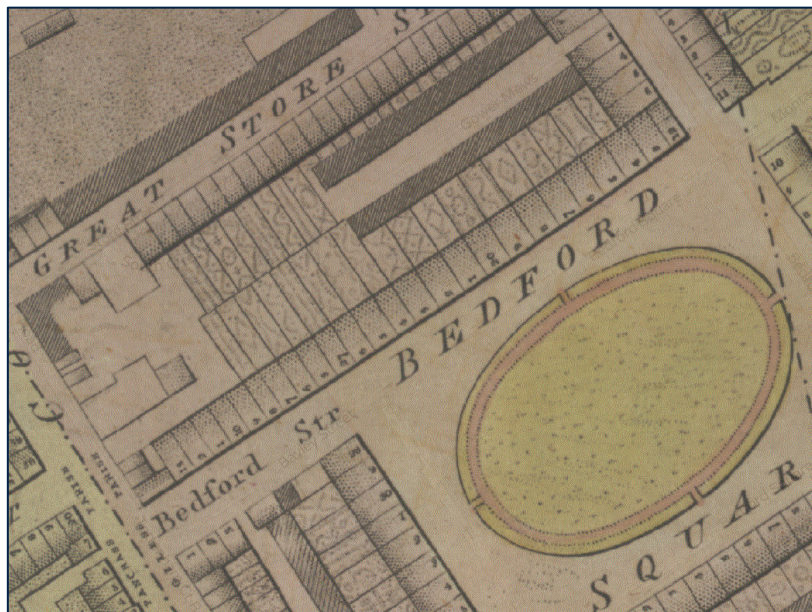
4.3.1 Bedford Square was laid out between 1775 and 1783 on land, presumably the gardens of Montagu House as shown in Roque's map of 1746 (see **figure 2**). This land was owned by the Russell family, the Dukes of Bedford, from which the square takes its name, and it is known that Thomas Leverton designed a number of the houses around the square, although not all of them. Building agreements show that the square was built by William Scott and Robert Grews, with the first leases issued in 1776. The leases on the houses were granted once the shells were completed, with the leases to the north of the square granted in 1781 and 1782. The delay in the completion of the houses is attributed to the American War of Independence, with loans granted to the builders by the Bedford estate trustees in 1777 to ensure building works continued.



**Figure 2.** Extract from John Roque's map of 1746. Bedford Square was developed on land belonging to Montagu House, which would later be demolished to make way for the present British Museum. ©Layers of London

- 4.3.2 The completed square can be seen on Richard Horwood's map of 1799, as shown in **figure 3**. Horwood's map shows the terrace of houses with flat rear elevations, facing onto landscaped gardens, some bound by the terraced mews buildings. Bedford Square was one of the earliest planned squares of London, with a homogenous design tying the development together around a landscaped garden square. The architectural style of the houses around the square was fashionable for its time, with influences possibly drawn from the Adam brothers and Henry Holland, prominent architects and designers of the mid-18<sup>th</sup> century onwards.
- 4.3.3 In 1851, No. 22 Bedford Square was occupied as a single residential dwelling by Jacob and Alice Goodhart, along with their three servants. The Goodharts are recorded again in the 1861 Census, although by 1871 the property was occupied by Beare Falcke, a Prussian individual who traded in silver and diamonds.





**Figure 4.** Richard Horwood's map of 1799 shows the completed Bedford Square, with No. 22 situated on the north western side towards Gower Mews. © Layers of London

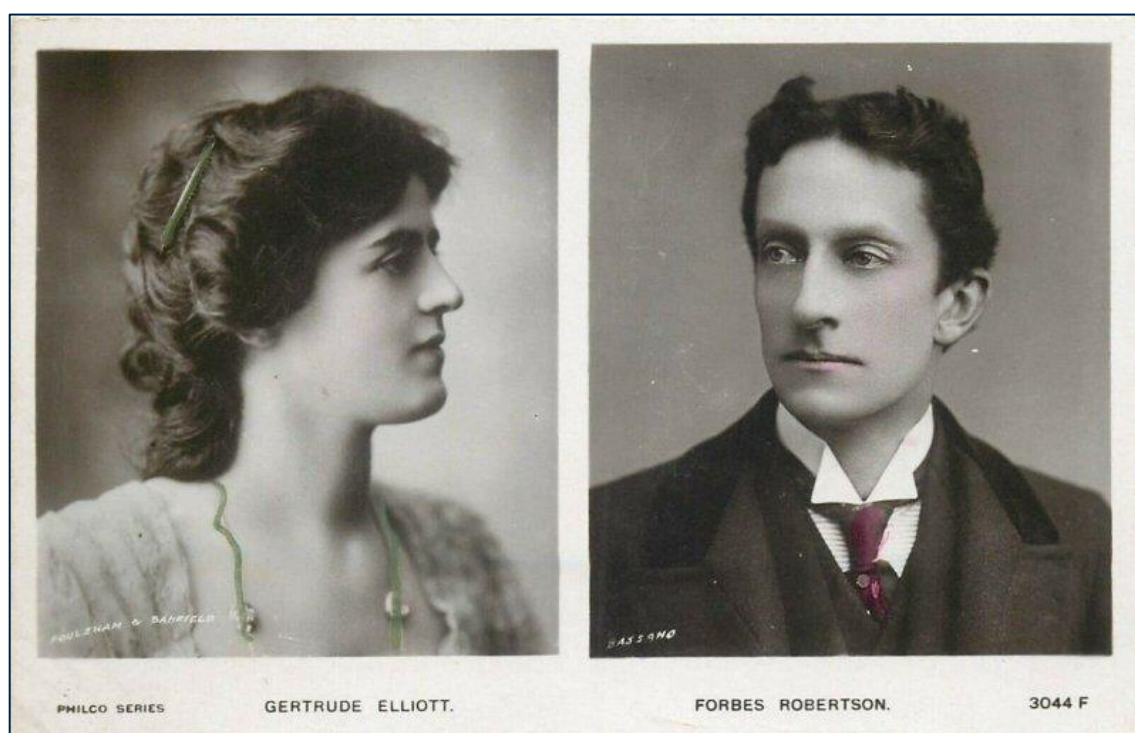
4.3.4 Charles Booth's poverty map of 1889 shows that the occupants of Bedford Square were 'Upper-middle and upper class. Wealthy' (see **figure 4**). The 1891 Census records the retired journalist, John Forbes Robertson, his wife Frances and their four children, who included the miniaturist painter Mary Robertson, along with three servants occupying No. 22 Bedford Square. By 1901 the Robertson's children had moved from the property.



**Figure 3.** Charles Booth's Poverty Map of 1889 shows the occupants of Bedford Square were 'Upper or upper middle class. Wealthy'. © London School of Economics



- 4.3.5 One of the most notable occupants of No. 22 is Sir Johnston Forbes-Robertson, an actor who was considered to be one of the finest Hamlets of the Victorian age. He was also the husband to American actress, Gertrude Elliott who hailed from a family of actors, and is shown with Forbes Robertson in a postcard from the early-20<sup>th</sup> century (see **figure 5**). The couple had four daughters who would all go on to successful careers in acting, aviation engineering, writing and artist.



**Figure 5.** Sir Johnstone Forbes-Robertson and his wife Gertrude Elliott, were both noted actors of the Victorian period and lived at No. 22 Bedford Square until at least 1938. Following their occupancy the house became the offices of the Association of Certified & Corporate Accountants Ltd

- 4.3.6 Lady Forbes-Robertson is listed at No. 22 in Webster's Royal Red Book of 1938, a year after the death of her husband. However, by 1940 the Site is listed in the Post Office Trade Directory as the Association of Certified & Corporate Accountants Ltd, indicating a shift from private residential dwelling to commercial office building. Subsequent planning permission applications throughout the mid-20<sup>th</sup> to early-21<sup>st</sup> centuries have been in connection with the continued use of the building as a commercial occupation, extending and altering the building to accommodate the needs of its occupants (see Appendix 1 for full planning history).
- 4.3.7 No. 22 Bedford Square was Grade I listed on 24 October 1958, in part, for its group value with the immediate terraces of houses that make one of the best surviving compositions of planned London

squares, set around a central landscaped garden.

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## 5.0 Heritage assets – significance and setting

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### 5.1 Introduction

- 5.1.1 A heritage asset may be defined as a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).
- 5.1.2 The planning policies listed in Appendix 2 aim to promote development proposals that will preserve, conserve and, where possible and appropriate, enhance the historic environment; and that will seek to avoid or mitigate against harm.

### 5.2 Significance

- 5.2.1 Historic England suggest that the aspects that reflect significance are the four values that people associate to a place: aesthetic value, evidential value, historic value and communal value. However, the NPPF defines the significance of a heritage asset 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.”* The NPPF definition largely corroborates the four values identified by Historic England in the *English Heritage Conservation Principles Policies and Guidance 2008*, although the Historic England Guidance takes a broader approach.
- 5.2.2 The heritage assets which may be sensitive to the proposed scheme options are identified as the Grade I listed No. 22 Bedford Square and the Bloomsbury Conservation Area.

### 5.3 No. 22 Bedford Square (Grade I listed)

- 5.3.1 The significance of No. 22 Bedford Square can be attested by its Grade I listing, designated on 24 October 1958. In 2019 a series of full planning permission and listed building consents allowed proposals, which, in part, sought to reinstate the historic plan form of the house where it had previously been eroded by incongruous interventions. The consents also allowed for the reinstatement of missing interior architectural features, such as fireplaces, as well as new interventions such as floor mounted

electrical boxes, in connection with the use of the building as a commercial space. Although these consents allowed for non-traditional interventions these were part of a wider programme of works which saw the architectural interest of the heritage asset further enhanced and restored. The demolition and rebuilding of the link structure between main house and existing mews building is legibly different from the historic structure and provides an interesting architectural narrative of the Site.

5.3.2 The architectural interest of the Site contributes to its significance along with the overall composition of the square as part of a wider planned square. The early-21<sup>st</sup> century link building and heavily altered/rebuilt mews building to the rear are distinct in being contemporaneous with their periods and somewhat different to the main body of the Site, but have been assessed to make a positive contribution to the architectural interest.

5.3.3 No. 22 has also been assessed to possess historic significance, being a part of one of the best preserved planned town squares within London and an early remnant of the expanding capital city in the mid to late-18<sup>th</sup> century. The Site has also been home to some notable historic figures, as described above, one of whom is commemorated with an attractive brass plaque on the front elevation of the building.

5.3.4 Overall, the Site is assessed to make a positive contribution to its immediate and wider setting, which also contributes to the building's significance in the legibility of the historic town planning of the square and the composition of the uniform buildings. The landscaped square provides visual relief from the dense built form and also feeds into our understanding of the intended historic layout of Bedford Square.

#### **5.4 Bloomsbury Conservation Area: Sub Area 5 – Bedford Square/Gower Street**

5.4.1 The Bloomsbury Conservation Area is located within central London, its southern boundary around 750 metres north of the River Thames. It covers an area of approximately 160 hectares which extends from Lincoln's Inn Fields and High Holborn to Euston Road and from King's Cross Road to Tottenham Court Road.

5.4.2 Bloomsbury represents a period of London's early expansion northwards, dating from Stuart times (around 1660), which continued through the Georgian and Regency periods to around 1840. The first wave of building created a mix of uses with houses, a market, commercial, cultural uses, hospitals and churches. Later expansion of the northern part of the conservation area 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. The progression of development across the conservation area illustrates the subtle changes in taste and style in domestic architecture that occurred throughout the 17th, 18th and 19th centuries.

- 5.4.3 The significance of the Bloomsbury Conservation Area as a heritage asset is derived primarily from its well-articulated townscape planning. Bloomsbury is widely considered to be an internationally significant example of town planning. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area. Despite Bloomsbury's size and varying ownerships, its expansion northwards from roughly 1660 to 1840 has led to a notable consistency in the street pattern, spatial character and predominant building forms. As it exists today, the area's underlying townscape combined with the influence of the major institutional uses that established in the district and expanded over time is evident across large parts of the Conservation Area.
- 5.4.4 The initial designation of Bloomsbury as a conservation area in 1968 sought to protect elements of development from the Georgian and earlier era, but excluded areas of significant later development. There have been numerous subsequent extensions that have mostly reflected a growing appreciation of Victorian and Edwardian and high quality 20th century architecture. The quintessential character of the conservation area derives from the grid of streets enclosed by mainly three and four-storey development which has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated focal points. The townhouses arranged in terraces is the predominant form across the area, reflecting the speculative, (mainly) residential development of the Stuart, Georgian, Regency and early Victorian periods. This gives a distinctive repeated grain to large parts of the area, including sub-area 5 in which the Site is situated.
- 5.4.5 The general high quality of architecture within the sub-area 5 contributes to its architectural interest, which is also derived from the grid pattern street layouts. There are distinct landscaped open areas which are integral part of the historic planning within these sub-areas, as seen at Bedford Square, and which positively contribute to the setting and significance of the historic built environment, with which it has an integral physical and historical relationship.

- 5.4.6 The Bloomsbury Conservation Area has also been assessed to derive historic significance, encapsulating some of the earliest formal town planning within London through the layouts of grid-pattern streets and squares, as well as a number of prominent occupants and institutional buildings, such as the British Museum.
- 5.4.7 Owing to the size and complexity of the conservation area, it is subdivided into a series of character areas that generally share common characteristics to assist in defining those features that contribute to the area's special interest.



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## 6.0 Proposals and assessment of impact

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### 6.1 Introduction

6.1.1 The management and mitigation of change to the heritage resource resulting from development is based on the recognition within Government planning objectives that ‘...*heritage assets are an irreplaceable resource...*’ (NPPF para. 189). Impacts to the historic environment and its associated heritage assets arise where changes are made to their physical environment by means of the loss and/or degradation of their physical fabric or setting, which in turn leads to a reduction in the significance of the historic environment record and its associated heritage assets.

6.1.2 Planning legislation and policy requires that development should seek to preserve or enhance the significance of a heritage asset. Heritage policy in both its national and local contexts are detailed in Appendix 3.

### 6.2 Proposed works

6.2.1 This report accompanies a full architectural drawing pack produced by Thirdway, which should be consulted in conjunction with the following section.

6.2.2 The proposals comprise of the following works:

- Installation of built-in cabinetry across all levels
- Alteration and replacement of the existing light positions and fittings
- Repositioning of a number of existing electrical floor boxes across all levels
- Replacement of existing non-original floor treatments
- Installation of external and internal CCTV cameras
- Installation of soft-fixed ceiling mounted wireless points
- Installation of external mount for flag

### **6.3 No. 22 Bedford Square (Grade I listed)**

- 6.3.1 The proposals include the relocation of existing non-original electric floor boxes, which are to sit between existing floor joists and utilise existing service routes. It is also proposed to amend some of the existing lighting with minimal additional pendant light points to facilitate a new lighting scheme that meets the needs of the occupier. These works will see no removal of any original historic fabric and alter existing consented works to the listed building, allowing for its continued occupation by a commercial tenant and ensure the building's long-term conservation. It has been assessed that these works within the rear link building and new mews building will have no impact on the significance of the heritage asset and overall will have no adverse effect upon the special architectural or historic interest of the Grade I listed building.
- 6.3.2 New built-in cabinetry is proposed throughout the building, accommodating much of the technological aspects associated with commercial occupation of the building and avoiding the desire to mount screens to the original fabric of the heritage asset. The new cabinetry is to be scribed around existing interior architectural features making it legibly reversible in the future and having no impact on historic fabric and features. This proposal has been assessed to have no adverse effect upon the heritage asset's significance.
- 6.3.3 New flooring treatments are proposed throughout the building. However, it has been assessed that none of the existing flooring treatments throughout the property are original and their replacement would not adversely affect any historic fabric. The floor finishes have yet to be confirmed, but can be conditioned as part of any listed building consents.
- 6.3.4 A flag pole mount is proposed to the front elevation of the Grade I listed building, to be situated underneath the central first floor window of the building. These are not an uncharacteristic feature amongst the listed terraces of Bedford Square and its installation will have no adverse effect on the special historic or architectural interest of the heritage asset. The proposal will also allow for a discreet form of advertising for the female-only working collective group that is to occupy this building.

### **6.4 Bloomsbury Conservation Area: Sub Area 5 – Bedford Square/Gower Street**

- 6.4.1 It has been assessed that the proposed internal works will have no impact on the setting and significance of the Bloomsbury Conservation Area.

- 6.4.2 It is proposed to replace the non-original external tile treatment to the rear courtyard of the Site to suit the aesthetic of the client whilst also remaining sympathetic to the aesthetic of the conservation area setting. Whilst the final product has not yet been determined, this could be conditioned as part of a listed building consent. This proposal would not see any historic fabric impacted.
- 6.4.3 The installation of a flag pole bracket, pole and flag to the front elevation of the building reflects the character of the conservation area, with a number of the buildings around Bedford Square already hosting this feature. It will allow for a discreet form of marketing for the commercial occupants of No. 22 and has been assessed to preserve the setting and significance of the conservation area.

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## 7.0 Conclusion

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- 7.1.1 Savills Heritage and Townscape have been commissioned to provide a Heritage Statement in relation to proposed works as set out above, and the potential impact that the proposed works may have upon the setting and significance of No. 22 Bedford Square and the Bloomsbury Conservation Area.
- 7.1.2 No. 22 Bedford Square is a Grade I listed heritage asset that has been assessed to derive its significance from its special architectural and historic interest. The interest of the Site is primarily derived from its front façade, historic plan form and remaining internal architectural features. Later alterations and extensions have eroded some of this interest, but have facilitated the continued occupation of the building as a commercial space and ensured its longer term conservation. Previous full planning permissions and listed building consents in 2019 have allowed for further alterations, which in part, sought to reinstate the missing historical elements and plan form, as well as demolish and rebuild the link building.
- 7.1.3 The Site is situated within the Bloomsbury Conservation Area: Sub Area 5, and has been assessed to make a positive contribution towards the setting and significance of the conservation area. The proposed internal works have been assessed to have no impact on the setting and significance, and that the proposed flag pole mount, pole and flag is a characteristic feature within the square and the conservation area.
- 7.1.4 The proposals are part of a programme of works that will see the heritage asset occupied by a female only working collective and will ensure the long-term conservation of the heritage asset. It has been assessed that no historic fabric is adversely affected by these proposed works, which are minor in nature and deemed legibly reversible in the future. Overall, the proposals have been assessed to have no adverse effect on the special historic or architectural interest of the Grade I listed building.
- 7.1.5 This Heritage Statement meets the requirements of the NPPF and provides sufficient information in regards to heritage considerations.

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## 8.0 References

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## 9.0 Appendix 1: Planning history

No. 22 Bedford Square			
Planning Reference	Description	Decision	Date
2022/0118/P	Use of the premises as offices (Class E)	Granted	11 Apr 2022
2020/2333/L	Replacement of cladding to front entrance steps with Portland Stone	Granted	20 Aug 2020
2019/6438/P	Details required by condition 3 (materials and details drawings) of permission ref: 2019/3857/P dated 27/09/2019 (Demolition of existing link extension and erection of new link extension between main building and existing mews building to the rear).	Granted	30 Jan 2020
2019/5912/L	Removal of internal single door and replacement with a larger double door	Granted	17 Feb 2020
2019/4271/L	Internal and external alterations associated with demolition of existing link extension and erection of new link extension between main building and existing mews building to the rear.	Granted	27 Sep 2019
2019/3857/P	Demolition of existing link extension and erection of new link extension between main building and existing mews building to the rear	Granted	27 Sep 2019
2019/3534/L	Internal and external alterations including enlargement of existing mansard roof of rear mews building, enlargement of toilet block to rear lightwell, installation of mechanical plant to roof of toilet block and installation of AC units in rear lightwell	Granted	04 Oct 2019
2019/3444/P	External alterations including enlargement of existing mansard roof of rear mews building, enlargement of toilet block to rear lightwell, installation of mechanical plant to roof of toilet block and installation of AC units in rear lightwell	Granted	04 Oct 2019
2019/3640/NEW	Internal and external alterations including enlargement of existing mansard roof of rear mews building, enlargement of toilet block to rear lightwell, installation of mechanical plant to roof of toilet block and installation of AC units in rear lightwell.	Withdrawn by Council	
2009/1816/P	Change of use from offices (Class B1) to dual use as offices (Class B1) or educational uses.	Granted	17 Aug 2009
2004/5530/L	Internal alterations, including the installation of new partitions at the lower ground floor level to 3 <sup>rd</sup> floor level, the painting of the front door and the installation of a brass name plate next to the entrance door.	Granted	24 Mar 2005
PS9904456	Continued use for educational purposes (No plans submitted).	Withdrawn	28 May 1999
9200734	Change of use from offices to training with ancillary offices as shown on one un-numbered drawing	Granted	10 Sep 1992
HB1962	21/22 Bedford Square. Alterations and improvements including new lift shaft, access points in party walls and works of restoration.	Granted	08 Nov 1978
HB1217	Installation of a folding gate in the screen of the entrance hall	Refused	22 Jan 1976
HB1125	The insertion of a new window in the rear elevation to the Council Chamber	Granted	03 Oct 1975
20856	The insertion of a new window in the rear elevation to the Council Chamber	Granted	03 Oct 1975



HB929	21-22 Bedford Square. The installation of a fire door in the party wall at basement level at 21-22 Bedford Square, WC1	Granted	04 Feb 1975
HB187	Removal of 3no. fireplaces on fourth floor level at 22 Bedford Square, Camden	Granted	22 Oct 1970
HB99	The sub-division of the rear room on the second floor of 22 Bedford Square, Camden	Granted	29 Jan 1970
TP17170	The carrying out of alterations to the Council Chamber Room and offices at 22 Bedford Square	Granted	20 Dec 1965
TP1237	The erection of an extension at rear of 22 Bedford Square for office purposes	Granted	25 Mar 1964

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## 10.0 Appendix 2: Legislation and planning policy

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### Legislation.

Legislation relating to listed buildings and conservation areas is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.

The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that with regard to applications for planning permission affecting listed buildings or its setting:

*“s.66(1) 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.”*

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that with regard to application for planning permission within conservation areas:

*“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

### National Planning Policy Framework

The National Planning Policy Framework was introduced in March 2012, and later amended on the 28<sup>th</sup> July 2018 with further amendments in February 2019 and July 2021, as the full statement of Government planning policies covering all aspects of the planning process. One of the key planning principles of the Framework states 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”* (paragraph 189)

The glossary of the Framework (Annex 2) defines conservation as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Chapter 16 of the Framework outlines the Government’s guidance regarding conserving and enhancing the historic

environment in more detail. Paragraph 189 requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission, ideally as part of a Heritage Statement report. The level of detail should be proportionate to the importance of the assets and sufficient to understand the potential impact of the proposals on their significance.

Paragraph 195 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by development proposals. They should take this assessment into account when considering the impact of development proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of such development proposals.

Paragraph 197 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality, and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraphs 199 and 200 further outlines that local planning authorities should give great weight to the asset's conservation when considering the impact of a proposed development on the significance of a designated heritage asset, such as the conservation area. The more important the heritage asset, the greater the weight should be. It is also specified that any harm to or loss of, significance of a designated heritage asset should require clear and convincing justification.

Paragraph 201 outlines that local planning authorities should refuse consent where a development proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied. Paragraph 196 concerns development proposals that will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.

Paragraph 205 states that Local Authorities should require developers to record and advance the understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact. This evidence (and any archive generated) is to be made publicly accessible. However, the recording of evidence of our past should not be a factor in deciding whether such loss should be permitted.

Paragraph 206 encourages local planning authorities to look for opportunities for new development within

conservation areas and within the setting of heritage assets, to enhance or better reveal their significance. It also states that development proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset, should be treated favourably.

Paragraph 207 establishes that not all elements of a conservation area will necessarily contribute to its significance. Loss of a building which makes a positive contribution to the significance of the conservation area should be treated as either substantial harm under paragraph 201 or less than substantial under paragraph 202, as appropriate taking into account the relative significance of the building affected and its contribution to the significance of the conservation area as a whole.

### **Local Planning Policy**

No. 22 Bedford Square is located within the London Borough of Camden, which is one of 32 London boroughs. As such, local planning policy is covered by both the London Plan administered by the London Assembly, and the Camden Local Plan (2017). Only sections of the policies most relevant to the specific proposed scheme options are referenced.

### **The London Local Plan (2011): The Spatial Development Strategy for London consolidated with alterations since 2011 (March 2016)**

The London Plan 2011 (incorporating minor alterations from October 2013 and 2015) is the spatial development strategy for Greater London and as such a piece of relevant planning policy.

**London Plan Policy 7.4** discusses the local character of buildings, streets and open spaces and notes that development should have regard to the pattern and grain of development, allow positively contributing buildings to influence future character and is informed by the historic environment.

**London Plan Policy 7.6** relates to architecture and requires buildings to be of the highest architectural quality and of a scale, composition and proportion which enhances the public realm. The policy notes that materials and details should complement the established local character and that the amenity of surrounding areas should not be unacceptably harmed by new development.

**London Plan Policy 7.8** indicates that development should be sympathetic to the form, scale, materials and architectural details of heritage assets, and should, where appropriate conserve, restore and re-use heritage assets. The policy requires historic environments such as conservation areas to be preserved and enhanced and

development affecting heritage assets and their settings to conserve their significance in a sympathetic manner.

**London Plan Policy 7.9** requires the significance of a heritage asset to be assessed when development is proposed and schemes designed so that the heritage significance is recognised and, where possible, repaired, restored and put to a suitable and viable use that is consistent with their conservation.

### **Camden Local Plan 2017**

**Policy D1 Design** – The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g. is inclusive and accessible for all;
- h. promotes health;
- i. is secure and designed to minimise crime and antisocial behaviour;
- j. responds to nature's features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides high standard of accommodation; and
- o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

**Policy 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**

Designated 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 use 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 if 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 total or substantial demolition of an unlisted building that makes a positive contribution to the character of 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:

- j. resist the total or substantial demolition of a listed building;
- k. 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 buildings; and
- l. resist development that would cause harm to significance of a listed building through an effect on its setting.

### **Archaeology**

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

## 11.0 Appendix 3: Photographs



View looking north west towards the front elevation of No. 22



View within the entrance hall of No. 22. The stone tiles are non-original and laid as part of the 2019 consents





View within the front ground floor reception room. Previous listed building consent allowed for the installation of floor mounted electric boxes, dressed to follow the non-original flooring treatment



View within the first floor front reception room with its large pendant light and floor mounted electrical boxes.



View looking south along the early-21<sup>st</sup> century link building towards the original main building. The 2019 consents allowed for the demolition of the previous link structure and the construction of this legibly different building in connection with the use of the heritage asset as commercial occupation.





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