



4th June 2022

2022/0406/P

Obote Hope
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Objection to listed building consent application 19 Bedford Square (2022/0406/P & 2022/1172/L)

Dear Obote,

19 Bedford Square is a Grade I listed property and therefore defined as being of 'exceptional interest'. A Grade I listing represents the highest possible protection for heritage assets of this kind in the United Kingdom. As such, applications for alteration or repair to this site should be subject to the highest degree of scrutiny to ensure that no avoidable harm is caused to the significance of this building. At the heart of such a conservative approach should be the careful preservation of historic, and especially original, fabric.

Having inspected the submitted drawings and read the submitted statements, it is clear that in general, the works are intended to improve the general condition of the building, to remove unsympathetic modern alterations, and to reinstate historic layouts and materials throughout. However, we maintain significant concern about some of the works proposed. While these works may arguably be acceptable in a Grade II or II* listed building with sufficient justification, in the case of a Grade I listed building, we consider these works to be unacceptable. We do not consider the small benefits brought by the various internal improvements to outweigh this harm.

Levelling of Floors

Page 09 of the Design and Access Statement states that throughout the building, floors will be levelled as required for new floor finishes. These works are not annotated in the drawing set nor justified in the submitted Heritage Statement. It is therefore difficult to understand what works are being carried out, where, and how, but levelling of floors in a Grade I listed building has the potential to be extremely invasive, damaging to significance, and likely completely unnecessary given the apparent level flooring shown in the existing sections. Such work, involving removal and reinstatement of the floorboards, should not be permitted within a heritage asset of this significance and with such little justification.

Rooftop Plant

The development plan and conservation area management strategy is clear that plant should be minimised and well-designed. In this case, it appears the proposal is to install four new condensers for what appears to be an ASHP heating/cooling system, in conjunction with the removal of the existing plant in the courtyard.

It is our general approach that the installation of unscreened and un-attenuated plant onto the roof of a building, especially where historic, should be resisted in favour of more sensitively designed and considered alternatives, especially in sensitive locations. We recognise that in some cases, there may be no other alternatives available. In this case, the building is Grade I listed and therefore of exceptional significance, and the roof space is itself historic and therefore of special interest. This should be an overriding consideration in any planning balancing exercise.

Given the size of the site, we do not consider it necessary to install the condenser units onto the roof, especially when the existing courtyard at the rear contains a modern flyover extension, under which four condenser units could be easily installed, with this location also bringing the potential of appropriate screening and attenuation. It is also common practice throughout the CA to install condenser units in underutilised vault and undercroft spaces, with appropriate ventilation. This is an alternative approach which we support, and which appears to be possible on this site.

There is little justification as to why the roof has been chosen and other locations ruled out, nor why the total of four condensing units is necessary to maintain comfortable internal temperature. We have inspected the energy report which gives no such justification nor estimates or evidence for heating or cooling demand and supplies long-outdated information on Part L of the Building Regulations. It appears that many of the windows are either modern double-glazed casements or traditional single-glazed sash windows with secondary glazing installed. We would expect two commercially-rated units to be adequate in this situation.

While the benefit of the removal of the plant in the existing courtyard is recognised, this should not be used as a reason for circumventing the requirement for well-designed plant, especially within a heritage asset of this significance.

Recommendation(s)

- We would request that the applicant submit a statement justifying the number of condensing units, either with evidence of existing heating/cooling demand or projections, and why they cannot be adequately contained within the rear courtyard with appropriate screening and attenuation, or in other locations throughout the site.
- We would also request that a schedule is submitted explaining where, why, and how floors are to be levelled, identifying whether those floors are historic, and the total approximate deflection likely to be remedied by those alterations. However as stated, deflected floorings are characteristic of such buildings and contribute towards their significance, and we are unlikely to withdraw objection to this point.

Bloomsbury Conservation Areas *Advisory Committee*