

Heritage Statement

28 Bedford Square, London WC1B 3JS

Written by:	Ignus Froneman B Arch Stud ACiFA IHBC	Date:	12 Sept 2022
On behalf of:	Johanna Molineus Architects	Ref:	0605

1.0 INTRODUCTION

- 1.1 This Heritage Statement has been prepared by Ignus Froneman, Director at Cogent Heritage, in consultation with Johanna Molineus Architects and the applicant. It supports listed building consent application for minor internal changes to the mews at 27 Morwell Street, which is attached to the grade I listed building at 28 Bedford Square. For the avoidance of doubt, the proposal relates to the mews property only, which has been rebuilt in c. 1986, and which is entirely modern.

Purpose of the report, site inspection and research

- 1.2 The Heritage Statement assesses the effects of the proposed minor internal changes on the heritage significance of the listed building. The application site falls in the Bloomsbury Conservation Area, but there would be no effect on it as the changes are internal only.
- 1.3 The Heritage Statement was informed by a site visit, in August 2022, and desk-based documentary research. The inspection was non-intrusive, i.e. 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.

Legislation and policy summary

- 1.4 The section below summarises the key provisions of s.66 & s.72 of the Planning Listed Buildings and Conservation Areas Act 1990, the National Planning Policy Framework and the Development Plan policies.
- 1.5 **Legislation:** Legislation relating to listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act). Section 66(1) of the Act sets out the statutory duty in relation to development affecting the setting of listed buildings: and section 72(1) sets out the statutory duty in relation to any buildings or other land in a conservation area.

- 1.6 It is a well-established concept in case law that 'preserving' means doing no harm for the purposes of the 1990 Act. The Court of Appeal's decision in *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] (EWCA Civ 137) established that, having 'special regard' to the desirability of preserving the setting of a listed building under s.66, involves more than merely giving weight to those matters in the planning balance. There is a strong statutory presumption against granting planning permission for any development which would fail to preserve a listed building or its setting (and the same for conservation areas). In cases where a proposed development would harm a listed building or its setting (or a conservation area), the Barnwell decision has established that the duty in s.66 of the Act requires these must be given "*considerable importance and weight*".
- 1.7 The key legal principles established in caselaw are:
- i. 'Preserving' for the purposes of the s.66 and s.72 duties means 'to do no harm'.
 - ii. The desirability of preserving the setting of a listed building, or the character or appearance of a conservation area must be given 'considerable importance and weight'.
 - iii. The effect of NPPF paragraphs 199-202 is to impose, by policy, a duty regarding the setting of a conservation area that is materially identical to the statutory duty pursuant to s.66(1) regarding the setting of a listed building (and s.72 in relation to the character and appearance of a conservation area).
 - iv. NPPF paragraph 202 appears as part of a 'fasciculus' of paragraphs, which lay down an approach corresponding with the s.66(1) duty (and similarly the s.72 duty).
 - v. If harm would be caused, then the case must be made for permitting the development in question, and the sequential test in paragraphs 200-202 of the NPPF sets out how that is to be done. If that is done with clarity, then approval following paragraph 202 is justified. No further step or process of justification is necessary.
 - vi. In cases where there may be both harm and benefits, in heritage terms, great weight has to be given to the conservation and enhancement of a listed building, and its setting, and the preservation and enhancement of a conservation area. It is possible to find that the benefits may be far more significant than the harm.
- 1.8 **The National Planning Policy Framework:** Section 16 of the revised (July 2021) National Planning Policy Framework (the NPPF) deals with conserving and enhancing the historic environment, in paragraphs 189 to 208. Paragraph 189 of the NPPF states

that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

- 1.9 According to paragraph 194 applicants should 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.
- 1.10 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.
- 1.11 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. Paragraph 201 continues on the subject of substantial harm (this level of harm is not relevant to the present proposals).
- 1.12 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. The National Planning Practice Guidance (NPPG) describes public benefits as "*anything that delivers economic, social or environmental progress*".
- 1.13 **The Development Plan** is the London Plan (2021) and Camden's Local Plan (2017).
- 1.14 **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
- 1.15 Policy HC1, entitled "*Heritage conservation and growth*" is the most relevant of the policies in Chapter 7. Parts A and B of the policy deals with strategic considerations/requirements and these are not relevant to determining planning applications.

- 1.16 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.
- 1.17 **Camden's Local Plan (2017):** Policy D2 deals with heritage and requires development to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. According to the policy, the Council will not permit development that results in less than substantial harm to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm. Specifically in relation to listed buildings, the Council will (amongst others), 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.

2.0 ASSESSMENT OF SIGNIFICANCE

Historic background overview

- 2.1 The *Survey of London*¹ notes that plans for Bedford Square, on the western edge of the estate, were conceived in the 1760s by the 4th Duke of Bedford and, following the Duke's death in 1771, were advanced by his widow.
- 2.2 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.
- 2.3 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

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>

advantages gained when a large area such as this is dealt with on generous lines by the owner.

- 2.4 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 1**).

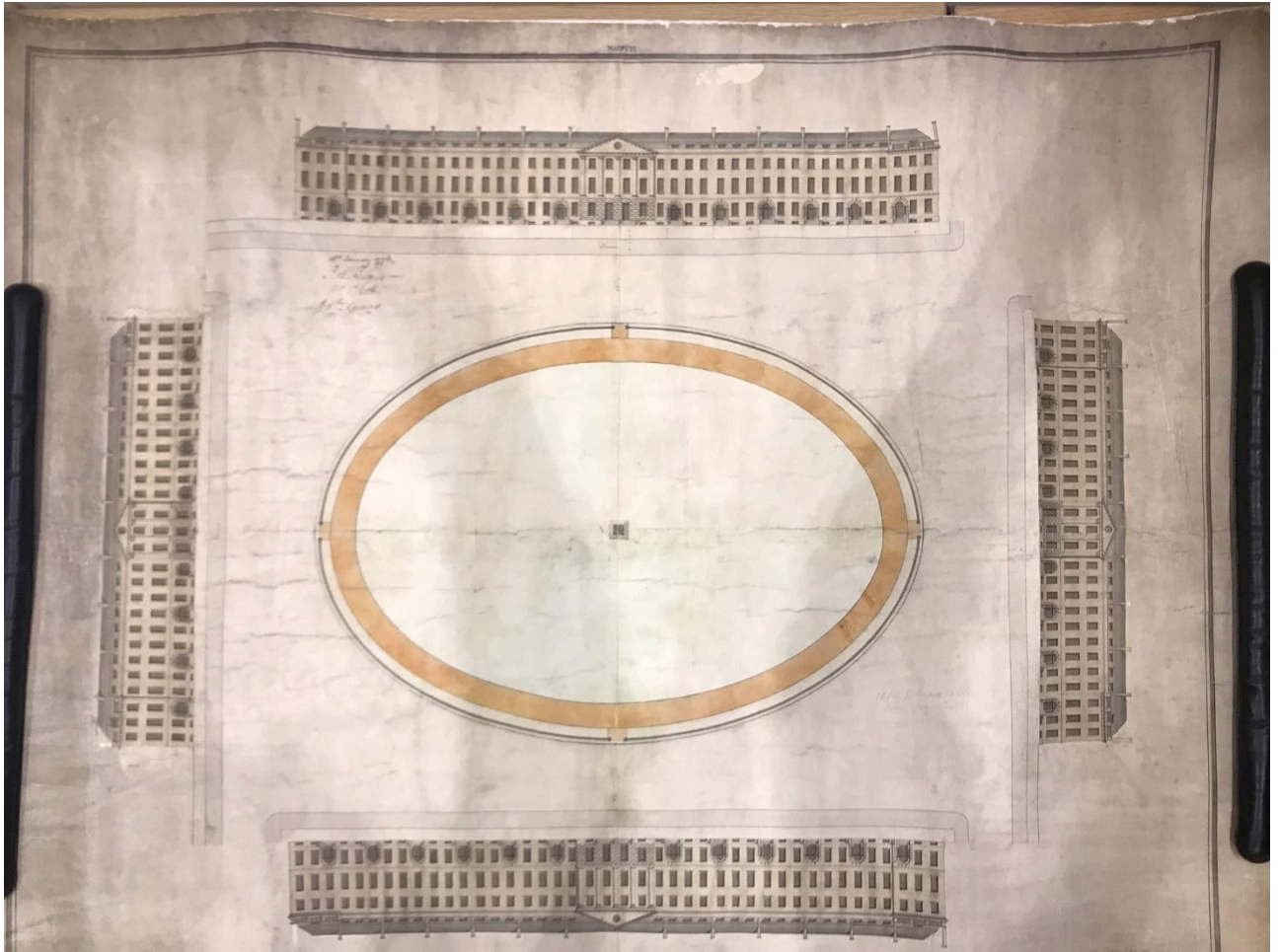


Fig 1: A plan of 1776, held by The Bedford Estates' archive (ref BI-P823).

- 2.5 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.
- 2.6 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.

- 2.7 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.
- 2.8 The general architectural scheme of the square is interesting. As can be seen from **Fig 1**, 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 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.
- 2.9 The round-headed entrance doorways, other than those to the central houses, are rusticated in Coade's artificial stone, and enclose a variety of fanlights.

28 Bedford Square

- 2.10 According to Historic England's National Heritage List, the terrace at 28-38 Bedford Square, along 26, 26A and 27 Morwell Street, 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:

"Terrace of 11 houses forming the west side of a square. 1776-1781. All built by W Scott and R Grews; perhaps designed either by Thomas Leverton or Robert Palmer; for the Bedford Estate. Nos 28-36 form a symmetrical terrace. Yellow stock brick with evidence on most of the houses of tuck pointing. Plain stucco band at 1st floor level. The centre

house, No.32, is stuccoed. Slate mansard roofs with dormers and tall slab chimney-stacks.

EXTERIOR: 3 storeys, attics and basements. 3 windows each. Recessed round-headed 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 cast-iron balconies to 1st floor windows: Nos 29 & 30, 32-36 & 38. Cornice and parapets, Nos 28 & 36 with balustraded parapets.

INTERIORS not inspected save for Nos 34-36, 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.28: 3 window return to Bayley Street, 1 blind. Rear elevation with full height bow. Major renovation in 1910. 3 plaster ceilings, one dating from the renovation. No.29: rear elevation with full height canted bay, bowed internally. A plaster ceiling. No.30: rear elevation with full height bowed bay. Fine ceilings, one with painted cameos. No.31: rear elevation with full height bowed bay. 2 fine ceilings. No.32: rusticated ground floor; 4 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.

Entrance of Doric columns supporting an entablature beneath the fanlight; double panelled doors. Rear elevation with full height bowed bay.

INTERIOR detailing and joinery particularly good. No.33: rear elevation with full height bowed bay. Internal distyle-in-antis screen with capitals derived from the Athenian Tower of the Winds. Plaster ceiling. No.37: rear elevation with full height bowed bay. Original wine cellar in the basement. No.38: a late C19 timber staircase. Some houses with original lead rainwater heads and pipes. Nos 34 and 35 acquired by the Architectural Association - Britain's first full-time school of architecture - in 1917, whose Head and, from 1920, Director of Education, was Robert Atkinson. In 1919-21 he made many alterations and added studios to the rear, which latter are of very austere design. Ground floor and first-floor front rooms made into one, now respectively lecture room and library, with missing mouldings to No.34 matched up with those surviving in No.35. This includes first-floor ceiling to No.34. First-floor library is a war memorial, with fitted bookcases by Atkinson and a memorial tablet to fallen members, unveiled 1921 and recarved after 1945 to commemorate both World Wars. No.35 has no staircase, but retains some fireplaces and original mouldings. Both houses have rear elevations with full-height bowed bays. No.36 also with full-height bowed bay to rear.

SUBSIDIARY FEATURES: attached cast-iron railings to areas with urn or torch flambe finials. 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 (qv). 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.35 was the residence of Thomas Wakley, reformer & founder of The Lancet, also of Thomas Hodgkin, physician, reformer & philanthropist (LCC/ GLC plaques). No.36 was acquired by the Architectural Association in 1927 and adapted as offices and members' rooms by Atkinson, who added more studios to the rear - these last again of very simple design. The presence of the Architectural Association in one of London's most important squares did much to promote the special interest and importance of Georgian London, especially amongst the many international architects and writers who came there. Here, for example, Steen Eiler Rasmussen lectured in 1928 and his book on the quintessentials of London architecture, 'London, the Unique City', perfectly captures the homely spirit for which London's Georgian squares and terraces have since been venerated. (Byrne A: Bedford Square, An architectural study: London: -1990; Summerson J: The Architectural Association, a Centenary History: Architectural Association: -1948)."

- 2.11 Although 28-38 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.
- 2.12 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*² 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

² *Bedford Square: An Architectural Study*, Byrne Andrew (1990).

and Gardens of Special Historic Interest in Greater London, at grade II*. Together, these make for a highly significant townscape.

- 2.13 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 28-38 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.
- 2.14 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 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.
- 2.15 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.
- 2.16 The *Survey of London*³ has a brief entry for 28 Bedford Square:
- "LXXX.—No. 28, BEDFORD SQUARE.*
- Ground landlord and lessee.*
- Ground landlord, His Grace the Duke of Bedford, K.G.; lessees, the Society of Architects.*
- General description and date of structure*
- On 1st November, 1776, a lease was granted of a messuage at the west end of Bedford Square, "on the south side of a new street called Bedford Street" (now Bayley Street), having a frontage to the square of 28¾ feet, and a depth of about 143 feet. The premises referred to are obviously No. 28, the northernmost house of the west block. The house has been greatly altered, and partly rebuilt. It retains in the ground floor front room the*

³ 'No. 28, Bedford Square', in *Survey of London: Volume 5, St Giles-in-The-Fields, Pt II*, ed. W Edward Riley and Laurence Gomme (London, 1914), p. 170. British History Online <http://www.british-history.ac.uk/survey-london/vol5/pt2/p170> [accessed 12 August 2022].

original white marble chimneypiece shown on Plate 86, with a sculptured panel in the frieze, which is also shown to a larger scale.

The front room on the first floor contains a decorative plaster ceiling, and a carved wood and composition chimneypiece, which, though in keeping with the style of the room, is probably not contemporary with the erection of the house.

Condition of repair.

The premises are in good repair.

Biographical notes.

The house first appears in the ratebook for 1779. Geo. Drake was then the occupier and he continued to reside there until after 1800."

- 2.17 The 1875 Ordnance Survey map (**Fig 2**) shows the earlier mews arrangement, which had gone by the 1896 Ordnance Survey map (not reproduced).



Fig 2: An extract of the 1875 Ordnance Survey map.

- 2.18 The late 19th century mews arrangement is recorded on photographs held at the London Metropolitan Archives (**Figs 3 & 4**), which show how the mews has been entirely rebuilt; the datestone on the entrance Morwell Street is 1986. Essentially, everything behind the bow of 28 Bedford Street dates from c. 1986.



Fig 3: An extract of a photo of 1970. © London Picture Archive SC_PHL_01_148_70_13564



Fig 4: An extract of a photo of 1970. © London Picture Archive SC_PHL_01_164_70_13565

- 2.19 It is plain to see, from both the exterior and the interior, that the mews has been completely rebuilt at that time.
- 2.20 The London Metropolitan Archives holds many photos of the ground, first and second floor interiors of the building, taken in 1960 and 1970. These record the fine ceilings,

chimneypieces, joinery and other decorative features, most of which can still be seen in the front block today.

- 2.21 Like the other houses on Bedford Square, 28 has a fine cantilevered stone staircase with principal front and rear rooms with good detailing – perhaps some exceptional Adamesque plasterwork. The plan form has remained intact on the ground to second floors, with at least some legibility elsewhere. A vast doorway connects the two first floor rooms – essentially the whole dividing wall – which a historic photo shows to have been closable with a six-panel folding partition door (probably a later insertion, but nevertheless a good feature), but this has been replaced with an ugly modern partition. There have been some alterations and losses elsewhere, with the windows to the bow being overlapped by the extension perhaps chief amongst these, and with the basement and upper floors rather plain.
- 2.22 Overall, the interiors feature some good detailing to the principal floors and have survived relatively well, and the interior (unlike some on the square) contributes to the outstanding interest of the building.
- 2.23 Everything behind the back wall of 28 Bedford Square is from the 1986 building campaign, when the present mews was built. This includes a most unfortunate addition that overlaps the rear bow at ground and basement levels, where the windows in the bow have been blocked. The mews building is modern in character, absent of any features of interest or significance.

3.0 IMPACT ASSESSMENT

Overview

- 3.1 The proposals are exclusively contained within the c. 1986 addition behind the Georgian house at 28 Bedford Street. The proposals are for minor internal changes to this modern part of the building only, e.g. the removal of partitions and/or rearrangement of doorways. No external changes are proposed.

Assessment

- 3.2 In short, it is not considered that any of the proposed changes would affect anything of architectural interest or historic value. The significance of the grade I listed building would remain entirely unaffected.
- 3.3 The interior of the 1986 building contains faux Georgian cornicing (**Photo 1**), as well as some rather Victorian-looking skirting boards (**Photo 3**) (which were clearly modern, off-the-peg examples) and joinery. These are relatively crude examples, and the photos below show how a wall oddly kinks and relates poorly to the window (**Photo 2**). The cornicing and joinery seem somewhat overly elaborate for a mews building, revealing a lack of authenticity, if there can be any doubt about that.



Photo 1: A ground floor room in the 1986 mews. The step in the wall on the left is not a chimneybreast, it is simply an odd kink in the wall.



Photo 2: A ground floor room in the 1986 mews. Note how oddly close the wall is to the window. The step in the wall on the left is not a chimneybreast, it is simply an awkward kink in the wall.



Photo 3: An example of modern, off-the-peg skirting boards in the 1986 mews.

- 3.4 Modern constructions methods, i.e. plasterboard ceilings and partition walls, were used in the mews. The layout does not appear to conform to anything historic; perhaps the best example of this is the most unfortunate way in which the first floor toilet cubicle can be seen through the window on Morwell Street (**Photo 4**).



Photo 4: The first floor window of the 1986 mews (note the inscribed keystone), above the front door on Morwell Street, with the toilet cubicle behind it.

- 3.5 The changes to the mews building would affect only modern fabric, of no value or authenticity, and which has a somewhat odd and questionable relationship with the host building. One of the changes proposed is the removal of the very oddly placed toilet cubicle above the door, as seen in **Photo 4**, and to the extent that there would be any effect, this would be positive.

4.0 CONCLUSIONS

- 4.1 The proposed minor internal alterations would affect only the c. 1986 mews building, which is entirely modern and which contains nothing of value or authenticity. The changes are minor, and would leave the significance of the Georgian house entirely unaffected.
- 4.2 The changes proposed would preserve significance of 28 Bedford Square.
- 4.3 No harm has been identified to the significance of listed building (or the conservation area). There are therefore no conflicts with Local Plan policies. Neither does the proposal trigger paragraphs 201 or 202 of the National Planning Policy Framework. The proposed development also complies with the statutory duties in s.66 of the Planning Listed Buildings and Conservation Areas Act, 1990.
- 4.4 As such it is respectfully submitted that this minor application should be approved.