



Historic England

Ms Elaine Quigley  
3777

Direct Dial: 0207 973

London Borough of Camden

Development Management  
P01569467

Our ref:

Town Hall

Judd Street

London

WC1H 9JE  
2024

2 January

Dear Ms Quigley

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**BRITISH MUSEUM GREAT RUSSELL STREET LONDON WC1E 7JW  
Application No. 2023/4648/P**

Thank you for your letter of 4 December 2023 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

The proposals are for the erection of two new buildings within the estate of the Grade I listed British Museum. Those buildings seek to increase the efficiency of energy consumption across the museum estate.

Historic England considers there to be some harm to the historic environment resulting from the proposed South West Energy Centre, due to its visibility on the skyline behind



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk



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various heritage assets. We recommend that this harm is reduced, where possible, and/or weighed in the balance against any proposed public benefits, in accordance with policies set out in the National Planning Policy Framework. We do not wish to raise any concerns with the proposed electricity substation.

## Historic England Advice

### Significance

The British Museum is arguably one of the greatest museums in the world. It contains some of the most important artefacts that tell the story of human artistic endeavour.

The British Museum's earliest buildings were designed by Sir Robert and Sydney Smirke and date from 1823-65. The southern façade of Smirke's composition is faced in Portland Stone and is inspired by Greek temple architecture, being symmetrically composed with a central entrance portico flanked by projecting side wings with dramatic colonnades. Later phases of development continued to reflect the austere and grand nature of this work and include Smirke's 1757 Round Reading Room and Sir John Burnet's King Edward Building of 1914. Together, the group of buildings that make up the museum are of outstanding architectural and historical significance and this is reflected in their Grade I listed status. Later phases of development of the Museum are of varying levels of significance and this is discussed in the recently updated Conservation Management Plan by Purcell, dated February 2023.

The British Museum is located within and makes a significant contribution to the character and appearance of the Bloomsbury Conservation Area, which is particularly noted for its Georgian developments and large institutional buildings. Bedford Square is located to the west of the Museum and comprises a composition of Grade I listed palace-fronted terrace houses addressing a highly-vegetated central garden space. The southern elevation of the Museum addresses Great Russell Street, which affords some of the best views of Smirke's composition.

The areas affected by the proposals include:

- A site on the West Service Road. This site is currently occupied by a lightweight modern building that is of no heritage significance. The service road has a clear back of house character and is addressed by largely un-fenestrated brick elevations to the museum buildings and by high brick walls addressing rear gardens to the Grade II listed Georgian terrace properties on Bloomsbury Street. The site is located directly adjacent to the flank elevation of the Lycian Building, which forms part of the original Smirke composition. Whilst this



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elevation incorporates Portland stone architraves and parapets, it was clearly designed to address a space that would not be seen by the public and is clearly of much lower significance than the visible street elevations, being principally faced in brick and with limited areas of fenestration.

- A site fronting onto Montague Street on the east side of the museum estate. This area is bounded to the street with railings, so is highly visible from the public realm and is in close proximity to Smirke's White Wing and the nearby Grade II listed Georgian terrace properties facing onto Montague Street. The site is currently occupied by modern Portacabins that are of no heritage significance and are considered to have a harmful impact on the setting of the surrounding heritage assets.

## Impact

The proposals include the removal of all modern buildings on both sites. The proposals are as follows:

### **West Service Road**

The proposed building new South West Energy Centre is arranged over ground and five upper floors with plant integrated into louvred screens on the uppermost floor. This building would provide new energy facilities for a large part of the museum estate, as well as ancillary office/mess accommodation for maintenance staff.

Due to the proximity of the proposals to the Lycian Building, the proposals are likely to impact on the significance of that building. At present, the most obvious impact is the blocking of views to and from the west elevation of the Lycian Building. Given the nature of the internal accommodation and the limited views of the exterior, this impact is likely to be low. There may be further impacts relating to the linking of associated service ducts, further details of which have yet to be provided.

Due to the height of the proposed building, it will be visible beyond its immediate environs. You have provided assurance and evidence that the proposals would not be visible from Great Russell Street or from the Southern Courtyard of the museum. However, the proposed building will be visible on the skyline over the Georgian properties on Bloomsbury Street from within the gardens at Bedford Square and looking east along Bedford Avenue. It will also be visible in views from Coptic Street and West Central Street where it will be seen over the southern gable end of the Grade I listed West Residence, which forms part of the original Smirke composition.



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In our view, the proposed visibility of the proposals has the potential to cause harm to the setting and significance of the affected heritage assets where it appears on the skyline over their rooftops and potentially interferes with the appearance of chimney stacks and other features of interest at roof level. We consider the proposed impact to be relatively low in relation to the Bloomsbury Street properties. However, in relation to the West Residence, we consider the impact to be higher, as the proposals will be seen to rise above the chimney stacks of that building and to have a clear presence on the skyline.

### **Montague Street**

The proposed new electricity substation would be set back from the street frontage and would comprise a single storey structure faced in rusticated render. The surrounding open area would be repaved in York Stone. These proposals are likely to have a positive impact upon the setting of the surrounding heritage assets.

### **Policy**

In accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, your Council must pay special regard to the desirability of preserving any features of special architectural or historic interest when considering planning applications which affect listed buildings including their setting, as well as preserving or enhancing the character of Conservation Areas as per Section 72 of the Act.

The National Planning Policy Framework (“The Framework” / “NPPF”) provides policies in respect of the conservation of the historic environment and of climate change, all of which serve the environmental objective of the planning system, one of the three objectives through which the purpose of the planning system, which is the achievement of sustainable development, is to be effected (NPPF, 8).

The Framework requires that when considering the impact of proposals on the significance of designated heritage assets, decision-makers should attribute great weight to their conservation; and “the more important the asset, the greater the weight should be” (NPPF, 205).

Consequently, harm to such assets should be minimised, and should require “clear and convincing justification” (NPPF, 201, 206). Justification may take the form of an argument of need or it may lie in the public benefit a proposal would procure, which leads to the balancing exercise, below. If justification is absent, or weak, the weight to be given to the public benefits a proposal would secure must be reduced.

Harm, if less than substantial, should then be weighed by the decision-maker against





public benefits in determining an application (NPPF, 208).

In respect of the climate crisis, the Framework's policies promote reductions in greenhouse gas emissions, minimise vulnerability and improve resilience. These policies should be understood in the light of the Government's target for the United Kingdom to reach net zero carbon by 2050.

The relevant passage of the Framework's policy in respect of the determination of planning applications for renewable energy development (NPPF, 163) reads as follows.

"When determining planning applications for renewable and low carbon development, local planning authorities should:

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
- b) approve the application if its impacts are (or can be made) acceptable..."

## Position

Historic England recognises the contribution that the new South West Energy Centre and electricity substation will make to reducing energy consumption across the estate.

We acknowledge that the proposals for the new South West Energy Centre will cause some harm to the historic environment, as highlighted above. In our view, this harm could be minimised or removed through seeking a reduction in the height of the proposed building. If you consider that the proposals are justified and that amendments should not be sought, the proposed harm should be weighed in the balance against any proposed public benefits, in accordance with policies set out in the National Planning Policy Framework.

We do not wish to raise any concerns with the proposed electricity substation.

## Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 201, 206 and 208 of the NPPF.



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In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Claire Brady**

Inspector of Historic Buildings and Areas

E-mail: [claire.brady@HistoricEngland.org.uk](mailto:claire.brady@HistoricEngland.org.uk)

