

22/03/24

Application: Erection of new energy centre incorporating maintenance support accommodation to internal West Road, new substation off Montague Street, all together with associated internal and external works, service runs, erection of plant, landscaping, and temporary works associated with construction following demolition of existing Energy Centre to internal West Road and removal of temporary buildings to the south of the existing energy centre on the internal West Road and to the north and east of the White Wing facing Montague Street.

LPA ID: 2023/4648/P & 2023/4903/L

Address: British Museum, Great Russell Street, Bloomsbury, Camden, WC1B 3DG

Dear Ms Quigley,

The Group has been made aware of the above applications for Planning Permission and Listed Building Consent. Based on the information available to date, the Group forwards the following advice to assist your local authority in determining these applications. The Group had the opportunity to undertake a site visit with the applicant's team prior to the completion of the full suite of documents.

Significance of Heritage Asset and surrounding Heritage Assets

The British Museum

The British Museum was designed by Sir Robert Smirke, who was then architect to the Office of Works and was tasked with designing a space for large sculptures but also collections of smaller artefacts. Smirke finalised the scheme in 1823, with the building of the museum being undertaken in various phases and altered in the following decades and centuries. The use of iron cramps to fix the large Portland Stone to a brick core was an innovative construction technique and contributes to the significance of the building. The entrance front to the building is particularly impressive with Greek Ionic columns forming a portico and colonnade which can be appreciated from the forecourt. The setting of the British Museum is enhanced by the visitors' experience within the forecourt, portico and the colonnade which contributes to the architectural interest of this grade I building.

Bedford Square

Bedford Square, which sits to the west of the site, was built between 1776 and 1780 by W Scott and R Grews to the designs of either Thomas Leverton or Robert Palmer.

The central garden is designated at grade II* and surrounded by four grade I listed terraces giving the square an architectural uniformity which set the style for garden squares in London through the late 18th century and early 19th century. The Bloomsbury Conservation Area Appraisal states that 'Bedford Square is one of the most significant and complete examples of a Georgian Square in London'. Whilst John Summerson refers to Bedford Square as 'one of the most valuable relics of Georgian London'. At present, when situated within the square you are afforded near uninterrupted views of the surrounding terraces, this is something that enhances the setting and significance of the listed garden and surrounding terraces on the square. The setting of Bedford Square makes a considerable contribution to the significance of the individual terraces and the ability to view the terraces amongst a near clear skyline preserves the 18th century character of the square.

Bloomsbury Conservation Area

The Bloomsbury Conservation Area is of international importance due to its association with some of the most important national buildings and for the legibility of the 18th and 19th planned street layouts with terraced squares. The special interest of the conservation area as stated within the conservation appraisal, is due to the 'experience of moving between streets, squares and other spaces, and the contrast created between enclosure and open spaces'. There are 14 sub-areas within the conservation area which each contribute different characteristics towards the special interest of the whole, however there is an overriding character and appearance relating to the 18th and 19th century town planning which contributes to the architectural and historic interest of the conservation area.

Proposals

The application involves the erection of new energy centre on the western section of the British Museum site. The temporary building currently situated on site will be removed and replaced with a five-storey building with a plant enclosure on top which is screened with a brick wall with louvred screens. The purpose of this building is to accommodate energy facilities for the British Museum site. Further work is proposed for the eastern section of site facing Montagu Street. A new electricity substation will be constructed to replace the current portacabins.

Proposals and Their Impact

Incoming Substation (ISS) Montagu Street

The proposed works to the east of the site comprise the removal of three portacabins which currently have a negative impact on the setting of the adjacent White Wing building, Bloomsbury Conservation Area and the western terrace on Montagu Street. The Group has no objections to their removal.

The proposed incoming substation would be positioned and finished with materials that would preserve the existing character and appearance of the conservation area and would not impact the setting and therefore significance of the White Wing building or western terrace on Montagu Street. The channelled rustication and height of the substation means it fits harmoniously within the existing built context.

South West Energy Centre (SWEC)

The Group has no objections to the removal of the existing portacabin in this area of the site. The replacement structure is five storeys above ground level with the fifth storey comprising a brick elevation with louvred screens concealing the proposed plant equipment. Due to the location and height of the south west energy centre there would be an adverse impact to the significance of the adjacent building, as well as an element of harm to the buildings within the proximity.

The Lycian Building's significance relates to historic interest associated with the footprint of the building which reflects Robert Smirke's initial masterplan for the whole site. The building has been subject to change in the subsequent centuries since its construction which has altered its visual appearance. The building does possess architectural interest relating to its external detailing with the ashlar front to the south and secondary brick elevation to the west denoting the primary elevation facing south which would have historically been more visible. The proposed south west energy centre would obscure the western elevation of the Lycian Building which would impact the architectural interest of the building. There would be some mitigation arising from the creation of a lightwell between the new structure and Lycian Building, as well as the removal of the existing servicing and ductwork.

The Group's main concern is the visibility of the new south west energy centre from the surrounding environs. In particular from within the registered Park and Garden, Bedford Square when looking south east where the new centre would be visible behind the terraces on Bloomsbury Street. The new centre would additionally be visible from along Coptic Street and in longer views down West Central Street to the South.

As stated within this letter, part of the interest of Bedford Square and the registered park and garden at its centre relates to their setting and the ability to appreciate a near complete example of an 18th century square. Your ability to do this is enhanced by the near uninterrupted views permitted from within the registered park and garden and the consistent roofline with chimney stacks and pots visible. As shown within the heritage statement, the new energy centre would be visible from within the registered park and garden where the new energy centre would rise above the grade II buildings on Bloomsbury Street. There would therefore be an element of harm to the setting and therefore significance of the Bedford Square park and garden.

When viewing the western Keeper's residence from West Central Street and Coptic Street the new energy centre would be visible in the skyline behind the building and sit behind the visible chimney stack. This would impact the setting of the building and obscure a streetscape element of interest which contributes to the wider interest of the Bloomsbury Conservation Area.

Policy and Guidance

Section 16(2) of the Planning (Listed Building and Conservation Areas) Act 1990 makes it a statutory duty for the local authority or Secretary of State, when considering whether to grant listed building, to 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. In regard to planning permission, section 66(1) of the Act makes it a statutory duty for decision makers to have special regard to desirability of preserving listed buildings or their setting. Section 72 of the Act states that special attention must be paid to desirability of preserving or enhancing the character of appearance of conservation areas.

Guidance on carrying out this statutory duty is set out by the Government within the National Planning Policy Framework (NPPF). Paragraph 205 states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Any harm caused to the significance of a designated heritage asset will need a clear and convincing justification for doing so in line with paragraph 206 of the NPPF.

Planning practice guidance set out by the government requires any harm identified to either be classified as less than substantial or substantial harm. If the harm is identified as less than substantial, then in line with paragraph 208 of the NPPF this harm should be weighed against the public benefits associated with the proposed scheme.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise'.

London Plan Policy HC1 states 'development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.'

Recommendation

As the application stands there would be elements of less than substantial harm arising from the height of the South West Energy Centre. The removal of the portacabins to the eastern section of the site would be an improvement and the Group has no objection to the introduction of the Incoming Substation. The Group would encourage the applicant to seek ways to minimise the height of the energy centre which would remove the harm caused by the current iteration of the scheme.

In determining this application, you should bear in mind the statutory duties contained within sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Yours sincerely,

Eddie Waller (Conservation Adviser for London and the South East)