Donald Insall Associates
Chartered Architects and Historic Building Consultants

King Edward VII Galleries, British Museum

Heritage Statement
For the British Museum

October 2021

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Contact Information

Cordula Zeidler FRSA IHBC (Consultant)
E: cordula.zeidler@insall-architects.co.uk
T: 020 7245 9888

London Office
12 Devonshire Street
London, W1G 7AB
www.donaldinsallassociates.co.uk

1.0 Summary of Overview Historic Building Report

1.1 Introduction

Donald Insall Associates was commissioned by the British Museum in October 2021 to assist them in the development of proposals for temporary air handling installations to the King Edward VII Galleries at the British Museum, London WC1.

The investigation has comprised historical desk-based research and a site inspection. A brief illustrated history of the site and building, with sources of reference and bibliography, is in Section 2; the site survey findings are in Section 3, the heritage significance of the building and assets in its setting is in Section 4, and the proposals are discussed in Section 5. The specific heritage constraints for this building and its context are summarised below.

1.2 The Building, its Legal Status and Policy Context

The King Edward VII Galleries is a Grade I listed building which forms part of the British Museum but has its own list entry. It is located in the London Borough of Camden's Bloomsbury Conservation Area. Alterations to a listed building generally require listed building consent and justification regarding their impact on heritage significance; development in conservation areas or within the setting of a listed building or conservation area requires local authorities to assess the implications of proposals on built heritage.

The statutory list description of the listed building is included in Appendix I and a summary of guidance on the Bloomsbury Conservation Area provided by the local planning authority is in Appendix II, along with extracts from the relevant legislation and planning policy documents.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 16, 66 and 72 of the Act impose statutory duties upon local planning authorities which, with regard to listed buildings, require the planning authority to have *'special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses*' and, in respect of conservation areas, that '*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*'.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the site comprises the Camden Local Plan (2017) and The London Plan (March 2021).

The Camden Local Plan has policies that deal with development affecting the historic environment, in particular Policy D2: Heritage, which states that '*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*'.

Policy HC1 Heritage Conservation and Growth of The London Plan (March 2021) stipulates that *'(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.... Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process*.'

The courts have held that following the approach set out in the policies on the historic environment in the National Planning Policy Framework 2021 will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6). At the heart of the Framework is *'a presumption in favour of sustainable development'* and there are also specific policies relating to the historic environment. 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'*. It states that 'great weight' should be given to the conservation of heritage assets, that any harm to their significance requires 'clear and convincing justification', and that 'less than substantial harm' to heritage significance should be outweighed by public benefits.

1.3 Summary Assessment of Significance

A detailed assessment of significance with guidance on the relative significance of elements of fabric and plan form and the extent to which these elements are sensitive to alteration is included in **Section 4** of this report. The following paragraphs are a summary explaining why the listed building and conservation area are considered of nationally -important architectural and historical interest.

The **King Edward VII Galleries**, constructed as an extension the British Museum in 1906-1914, are of exceptional architectural and historic special interest, and this is reflected in their listing at Grade I, a separate list entry from that of the British Museum. The building is an important work by the prominent architectural practice of J. J. Burnet, later Burnet and Tait, and then Burnet, Tait and Lorne, whose designs, many in London, are amongst the best classical and modern buildings in inter-war England. The King Edward VII Galleries is the only executed building of a comprehensive masterplan by Burnet to enlarge the British Museum to fill the entire city block and replace all surviving terraced Georgian houses around the Museum's perimeter with museum accommodation. Whilst the masterplan did not come to pass, the King Edward VII Galleries were built, and housed part of the expanding museum's collection, namely British and Medieval Antiquities, the print room, the map room, and, inset to the south, the North Library.

The **British Museum** is a building which is, somewhat surprisingly, separately listed at Grade I. Its heritage significance as the nation's foremost museum of archaeology, ethnography and artefacts from across the world is of exceptional value, both for its collections, its history and architecture. The relative significance of the various parts of the museum is set out in the Conservation Management Plan by Purcell Miller Tritton (2008) and does not need to be replicated here. The elements of the museum that face the rear elevation of the King Edward VII Galleries, the north elevations of the north wing of Smirke's building, are unadorned and partly altered stock brick elevations designed to be hidden from view. They are of no more than medium significance.

The **Bloomsbury Conservation Area** is large and takes in Georgian terraced streets and garden squares developed by the Earl of Bedford, large university buildings of the 20th century, and commercial buildings including hotels on Southampton Row leading to Euston Station. The site is in sub-are 3 which includes the British Museum and university buildings including Senate House, and this is defined by large-footprint, handsome buildings in a variety of styles which clearly express their function and stand in contrast to the tighter grain of surrounding terraced Georgian houses which otherwise dominate Bloomsbury.

1.4 Summary of the Proposals

It is proposed to create a temporary ventilation arrangement for Gallery 33 in the King Edward VII building. This would allow the repair of the existing ventilation services which have failed due to water ingress and resultant mould growth. The temporary arrangement would be time limited to 5 years and entail the addition of ducts to the rear elevation at first floor level, the temporary removal of a small number of glass panes where the ducts would serve the galleries, with louvers inserted instead. This would allow the galleries to open to the public which is not possible without forced ventilation, and enable the long term repair of the existing concealed ventilation system.

The King Edward VII Galleries would be substantially preserved, and there would be no harm to the setting of the British Museum or the character and appearance of the Bloomsbury Conservation Area. There would be a small amount of less than substantial harm caused by the temporary addition of external ducts, their fixings, and their small internal manifestations, caused to the rear elevation (internally and externally) of the Kings Edward VII building. This impact is not avoidable and without it, it will not be possible to affect the long term beneficial repair of the existing concealed air conditioning system that serves this gallery. Gallery 33 requires forced ventilation in order to operate and accommodate public access in numbers that are needed to provide a normal service.

Therefore, the public benefit that would be brought about by these proposals is substantial and two-fold:

- the temporary ventilation system would allow the public to access Gallery 33, an important space in the British Museum that has key exhibits of the China and South Asia collection and that is currently closed because of the failure of the existing air handling system;
- the proposals would enable a well-planned, considered and long-lasting repair of the permanent concealed air handling system.

These public benefits comfortably outweigh the temporary, low level less than substantial harm caused to the rear elevation of the King Edward VII building. For this reason, they comply with the Camden Plan (D2) and the NPPF (202), and these are material considerations meaning that the requirements of the Act (sections 16, 66 and 72) and the London Plan (Policy HC1) are also met.

2.0 Historical Background

2.1 The Development of Bloomsbury

The development of Bloomsbury was a result of London's early expansion northwards. Following the Dissolution of the Monasteries, the Manor of Bloomsbury had been assigned to Thomas Wriothesley, 1st Earl of Southampton, in 1550. In 1640, the 4th Earl of Southampton obtained a royal license to build his residence. However, development was delayed by the outbreak of the Civil War. Widespread development only commenced following the Restoration **[Plate 2.1]**, when in 1661 the 4th Earl of Southampton was granted a building license for the construction of Southampton Square (now Bloomsbury Square). This was one of the first London squares to be built and the Earl's own house, Southampton House, was erected on the north side **[Plate 2.2]**.

Development continued when the estate passed to the Russell family (the Dukes of Bedford) after the 4th Earl's daughter married William Russell in 1669. Southampton House became Bedford House and other notable developments of this period included the formation of Great Russell Street and Southampton Row (c.1670), and the construction of Montague House, which became the home of the British Museum in 1759.

Smaller houses for artisans and workmen were provided in the hinterland. By the end of the 18th century, Richard Horwood's *Map of London, Westminster and Southwark*, 1792-9, shows that the street pattern, comprising wide streets and grand squares, extended northwards from Great Russell Street in two prongs along Tottenham Court Road to the west and Lambs Conduit Street to the east **[Plate 2.3]**. In between, the land to the rear of Bedford House and the British Museum remained open fields, bordered on the east side by Southampton Row and King Street.

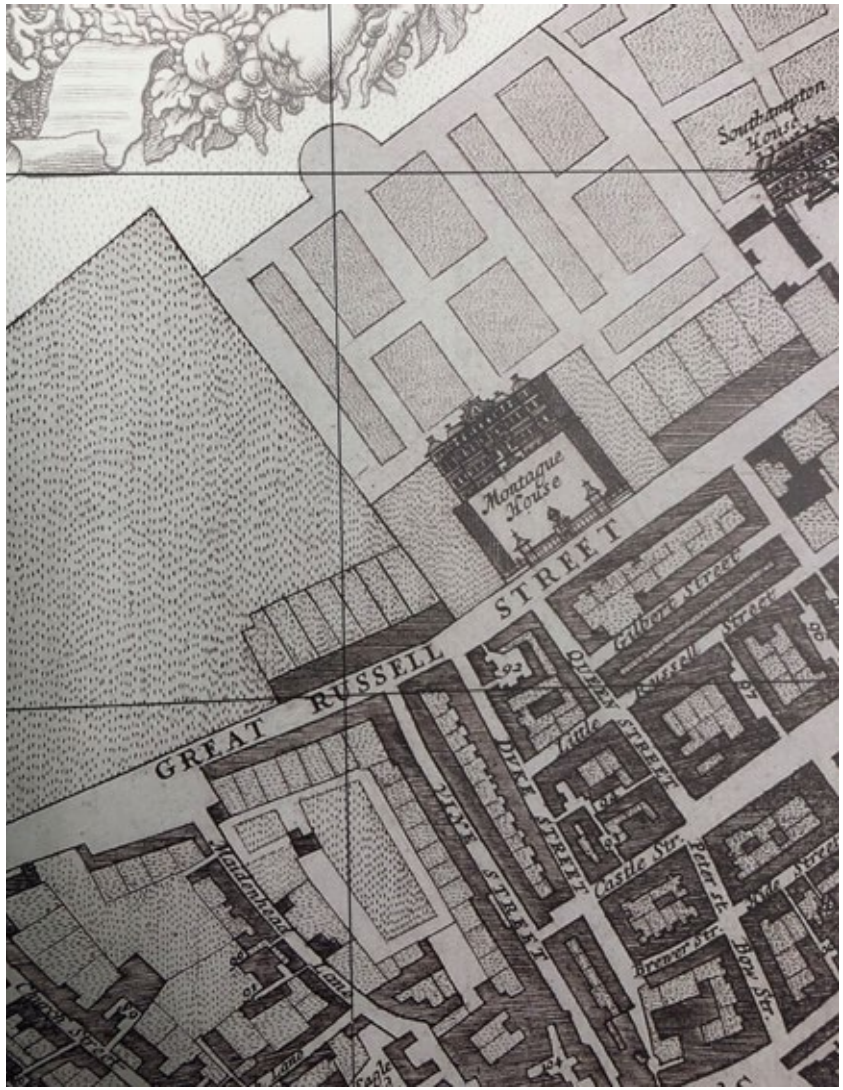
Later expansion in Bloomsbury focussed on providing grander residential neighbourhoods for the upper middle-classes and was carried out speculatively by different builders, on leases obtained from major landowners.[1] The redevelopment of the Bedford Estate was carried out during the first half of the 19th century. Bedford House was replaced by Bedford Place, a thoroughfare running north from Bloomsbury Square to Russell Square, a large garden square enclosed on all sides by fine terraced houses built between 1801 and 1804 to the designs of James Burton. By the time of the 1895 Ordnance Survey map, Bloomsbury's formal grid pattern of streets and garden squares had been fully established **[Plate 2.4]**.

During the latter half of the 19th century, the unlawful conversion of large townhouses into various commercial uses became endemic to such an extent that by 1892 the steward of the Bedford Estate had come to regard whole streets, such as Montague Place, as a lost cause.[2] Three major railway stations, London Euston (1837), Euston Square (1863), and Russell Square (1906), were built around the edge of Bloomsbury and with the advent of the railways, large-scale hotel, educational and office redevelopments began to appear by the turn of the 20th century.

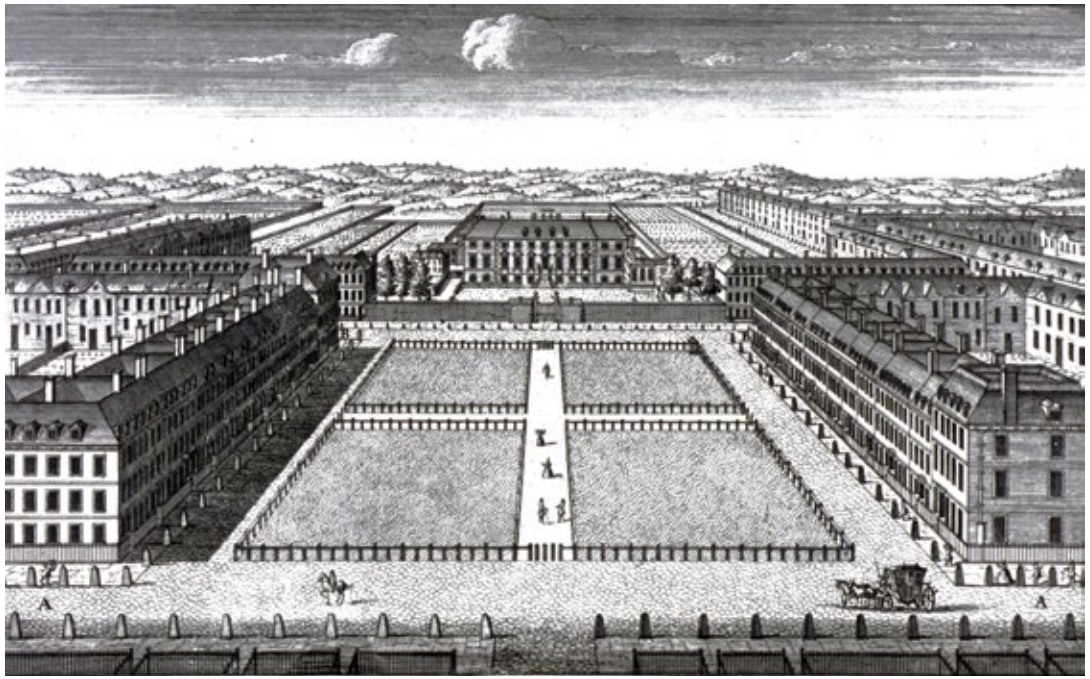
Bloomsbury's reputation as a fashionable, residential suburb for the upper-middle classes evaporated during the early 20th century. The first major redevelopments were largely associated with the expansion of the University of London. Bloomsbury experienced widespread destruction during the Blitz, which led to the loss of large areas of its older housing stock **[Plate 2.5]**. After the Second World War, the areas of greatest destruction underwent major redevelopment, comprising a mix of social housing and offices.

1 London Borough of Camden, Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011), p. 5.

2 'UCL Bloomsbury Project', University College London, https://www.ucl.ac.uk/bloomsbury-project/streets/bedford_house(1).htm [accessed September 2021].



2.1 *Morgan's map of 1682 showing Montagu House in place*



2.2 *Simplified view of Bloomsbury Square from the south, by William Angus, c.1750, British Museum site to the left (top) (London Metropolitan Archives).*

2.3 *Horwood's map of London 1792-9*

2.4 *1895 Ordnance Survey Map (National Library of Scotland)*

2.5 *LCC Bomb damage map showing war damage*

2.2 The British Museum

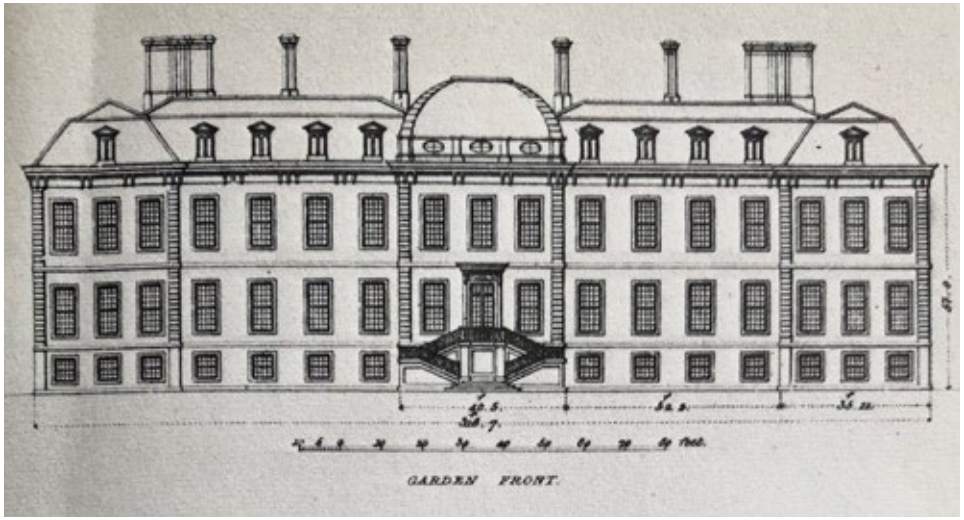
2.2.1 Montagu House

The British Museum has its roots in the donation of a number of private collections to the state. The collections included artefacts and books but also natural history specimens, reflecting the growing interest of the 18th century Enlightenment in both antiquarianism and science.

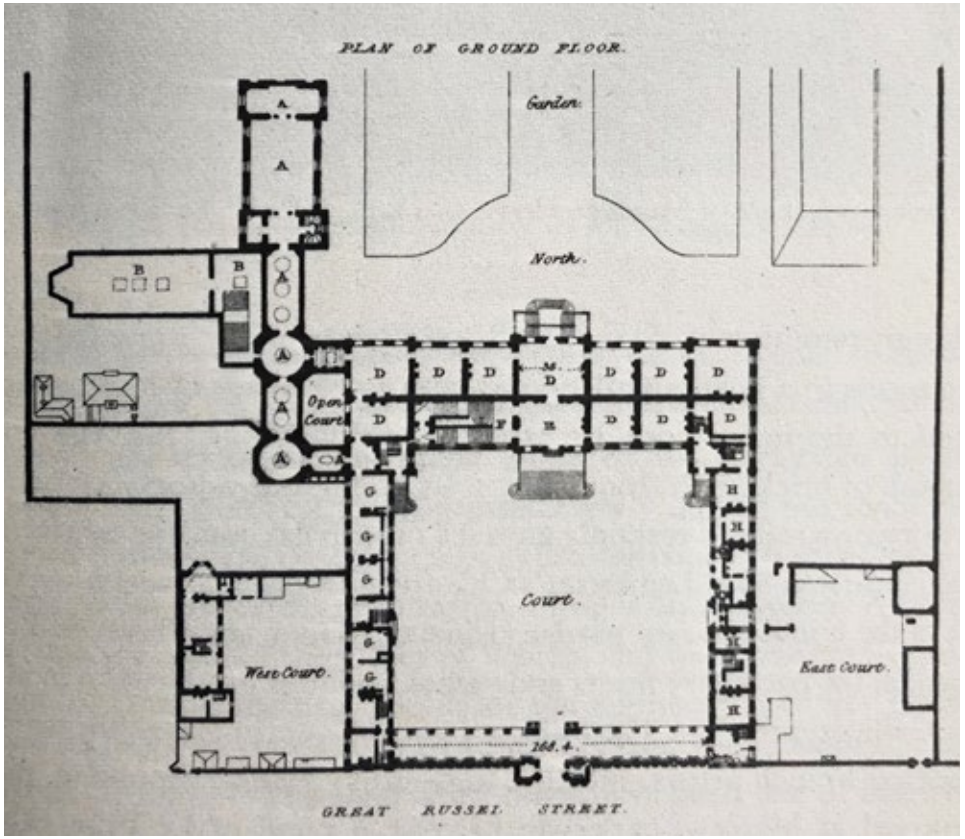
Sir Robert Cotton (1570-1631) amassed an outstanding collection of mediaeval manuscripts which were donated to the state after his death in 1700. No permanent home was found for it, and after a fire in 1731 which partly destroyed the collection the House of Commons instigated a search for a new suitable location. This search was intensified in 1753 when Sir Hans Sloane's (1669-1753) outstanding collection of artefacts and natural history specimens came to the market and was purchased by Parliament; this is generally seen as the most substantial and important foundation stone of the British Museum's historic collection. A third collection by Robert Harley, the Earl of Oxford (1661-1724) consisted of a vast array of books, medals and paintings which was also bought by the House of Commons.

In 1753 it was decided by Act of Parliament that a British Museum should be created, based on those collections. A state lottery was set up to collect the necessary funds, £300,000. Rather than construct a new museum, it was considered more economical to convert an existing building for this new function. The choice fell on Montagu House in Bloomsbury, a mansion in the French style of 1680 and 1686 (following a restoration after fire damage) which belonged to the Earl of Halifax **[Plate 2.6]**. In 1759 after some refurbishment work the British Museum in Montagu House opened to the public, but access was restricted to certain days and hours of the week, and was at the discretion of the museum's librarians. The varied collection displayed there included '*oriental idols, marble busts, elephants and sponges; polar bears, portraits, fossils and meteorites; Roubliac's statue of Shakespeare, Chantrey's statue of Banks, and several stuffed giraffes*'[3] in the entrance hall, and then collections organised in three departments, manuscripts, medals and coins; natural and artificial productions; and printed books, maps, globes and drawings in the rest of the building.

The collection was enlarged mostly through private donations, and occasionally though public money given by Parliament. In 1808 Montagu House was extended with a new wing designed by George Saunders to house fourth department, antiquities, named after a donation of Roman and Greek antiquities by Charles Townley. But this extension proved insufficient almost immediately, when in 1814-6 the Elgin Marbles and Phigalean Marbles were added to the collection. More bequests or artefacts and natural specimens flooded in in the 1820s, and, together with the newly donated Royal Library of George III they were so copious that it was clear that Montagu House was simply too small.



2.6 *Montagu House, elevation and plan (Mordaunt Crook)*



2.2.2 Smirke's Replacement Building

The architect for the replacement building of Montagu House was Robert Smirke (1780-1867), a well-connected Tory and the favourite man of his era, who was overseeing many public building projects for the Office of Works alongside his famous elders Nash and Soane. His prolific oeuvre included a vast number of churches, country houses, clubs, castles and public buildings. Smirke's skills also reached into more peripheral areas of design: he revolutionised structural systems in architecture and essentially invented quantity surveying. Stylistically he tried his hands at several of the then fashionable styles, but his Gothic architecture was unconvincing and it is his Greek buildings which were more successful. Greek Revival was the favoured style for new museums in the early 19th century, with many 'temples of the arts' created at that time, and Smirke was therefore well suited to the task and the taste of the era.

Smirke was appointed in 1820 to begin work on a new British Museum as the museum fell under the auspices of the Office of Works where Smirke oversaw new buildings. Initially Smirke proposed two new northern wings to Montagu House, but by 1823 a full replacement building, to be constructed in phases, was presented to the Treasury. This design, with a cour d'honneur with a giant order ionic colonnade on the south side and a quadrangle arrangement beyond, sitting behind retained Georgian houses to the east, west and north which belonged to the Bedford Estate, was built between 1823-52, with Montagu House fully demolished only in 1847. The slow construction progress was largely due to government funding shortages, and meant that visitors to completed elements of the building had to put up with noise and disturbance. The King's Library in the east wing was finished first in 1829, and construction then progressed to the west wing to house the Elgin Marbles, and then came the north wing, with the southern front range coming last in 1841-8. Smirke retired in 1846 and the completion of the building was left to his younger brother Sydney and Sydney's son, Sydney Smirke Jnr.

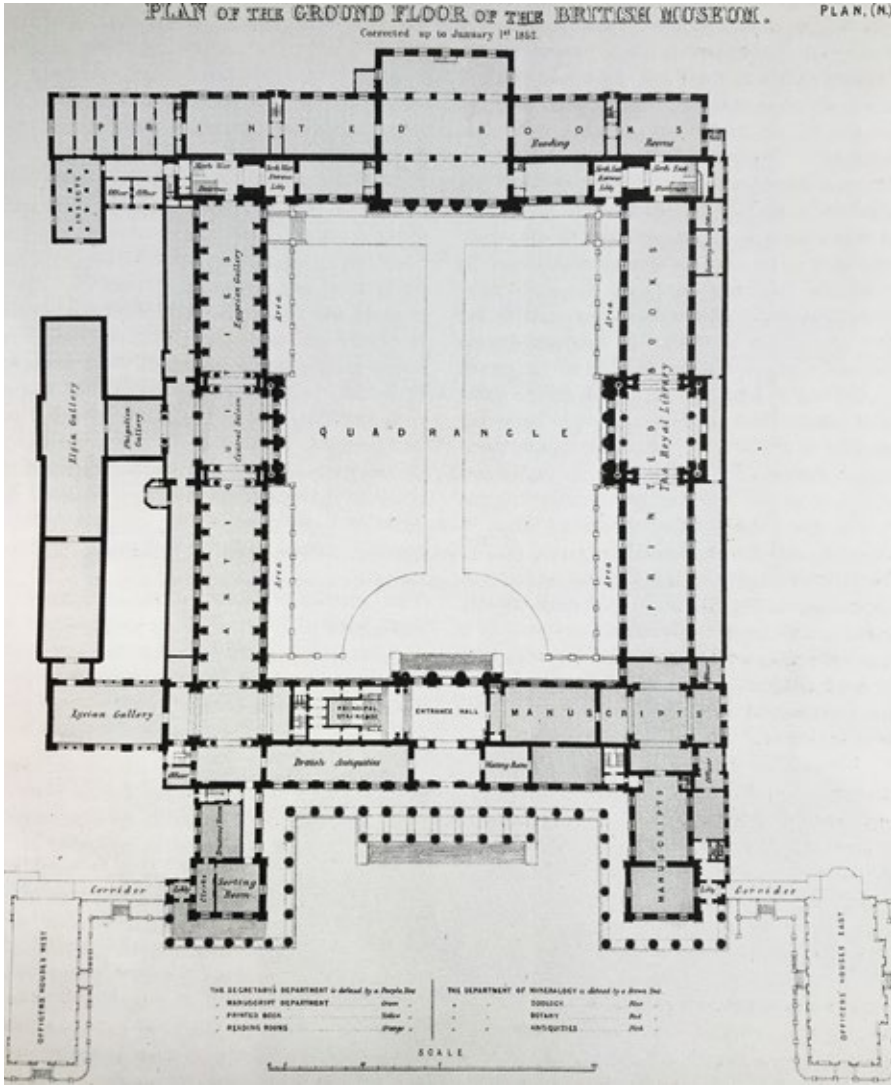
When the museum was finally complete it was painfully out of fashion **[Plates 2.7 and 2.8]**; Greek Revival was firmly out, and Smirke was criticised for the museum's stylistic failings, but also its formulaic planning and the advantages Smirke had had because of his strong links to influential politicians and backers. Nevertheless, Smirke received the RIBA Gold Medal for it in 1853, and his work has since been re-evaluated as a nationally important example of English Greek Revivalism.

2.2.3 Alterations and Extensions in the 19th Century

The books collection of the British Museum was firmly part of its original collections, and it rose substantially to become the largest in Europe over the course of the 19th century. This expansion was driven by its librarian, Sir Anthony Panizzi (1797-1879). Panizzi was instrumental in enforcing the copyright Act which required publishers of British books to deposit a copy of each new publication at the British Museum, and he drove the acquisition of foreign books. This meant that the Museum's reading rooms in the north wing became too small, and Panizzi therefore instigated the construction of a new space: the circular reading room. There was a competition, involving Charles Barry and Sydney Smirke, and much debate ensued as to whether the library should be placed into the empty quadrangle, but from 1854 to '57 a new circular building to designs of Sydney Smirke with a vast span held by cast iron ribs was built in the quadrangle. The library has since been removed from it, though it initially survived relocation of books to the newly-built British Library at St Pancras which opened in 1998.

Additions in the later 19th century followed against the background of a serious space shortage caused by an influx of acquisitions. They were the Mausoleum Room and the White Wing, built in the 1880s to designs by John Taylor of the Office of Works. In the meantime, Sydney Smirke suggested more radical enlargement, such as a third story above the original museum, and building around the quadrangles, none of which came to pass.

In 1886 the natural history collections of the British Museum which had from the start formed an integral part of the museum were opened in the newly-constructed Natural History Museum in Kensington, and this relieved space pressures but also meant that the British Museum's comprehensive reach was narrowed.



2.7 *1852 ground plan for British Museum as built (British Museum Collections)*

2.8 *Undated view of south front of the British Museum (Mordaunt Crook)*

2.3 King Edward VII Galleries

In 1895 a decision was made by the museum's trustees and the Exchequer to buy the terraced houses which lined the streets adjoining the museum to its east, west and north, in order to remove them and expand the museum. The buildings were bought off the Bedford Estate. A bequest made in 1899 and public money committed in 1903 meant that the project for new buildings gained momentum. In 1903 Henry Tanner of the Office of Works sketched out a scheme that came to nothing. In 1904, Aston Webb suggested seven names of suitably qualified architects to the Office of Works, all endorsed by the RIBA council. John James Burnet was appointed in 1905. That same year he established a London base in the name of John J Burnet at 1 Montague Place, a grace-and-favour house rented to him by the Museum, which was initially both house and office. Burnet brought with him Thomas Smith Tait, a pupil of James Donald, who had been recruited as his personal assistant in 1902, Andrew Bryce, and the classical scholar Theodore Fyfe, a former pupil and assistant who had established his own practice in London.

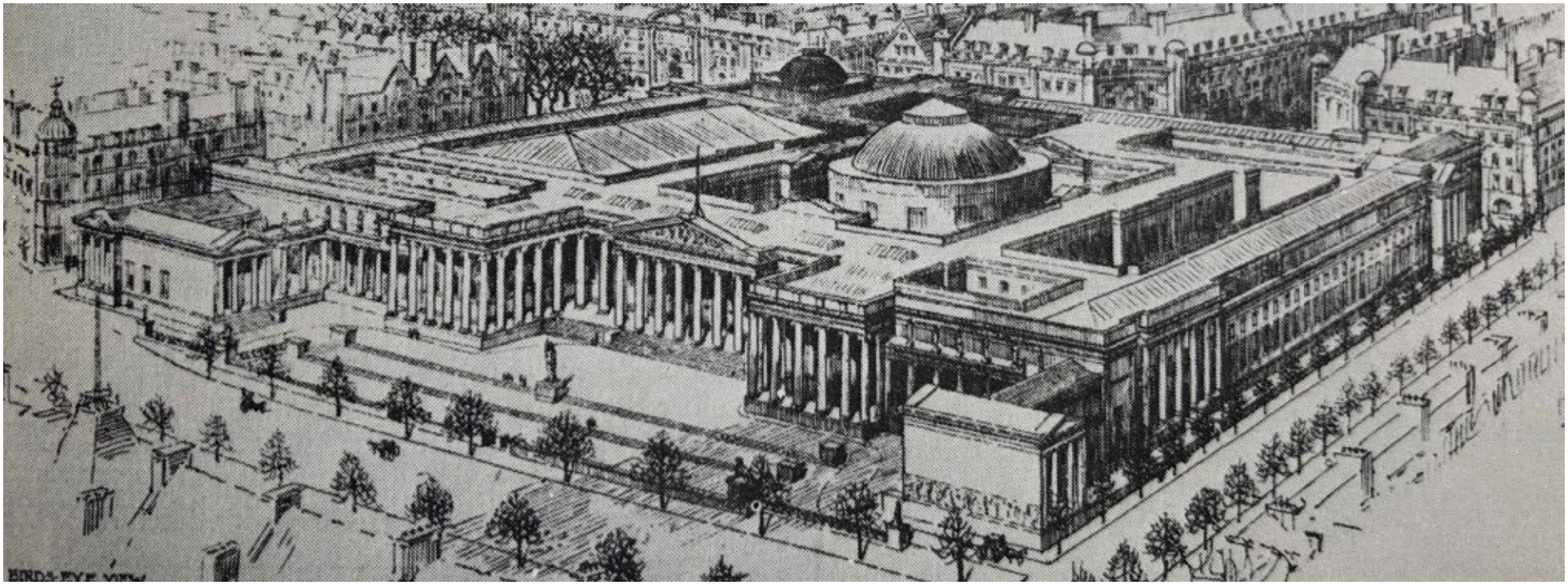
Burnet proposed an outer layer of Greek frontages to complement Smirke's design and fill the block **[Plate 2.9]**. There was to be a new wing and grand entrance on the north side, another on the west side with a large entry into a lecture theatre, a further wing on the east, and extensions framing the southern forecourt. A large covered court was suggested between the new west wing and the quadrangle for architectural exhibits.

Burnet also designed a wider-reaching masterplan for a Museum Avenue leading north from Montague Place, lined with symmetrical facades in the Beaux Arts tradition and a triumphal arch in the roadway **[Plate 2.10]**. None of these plans were executed.

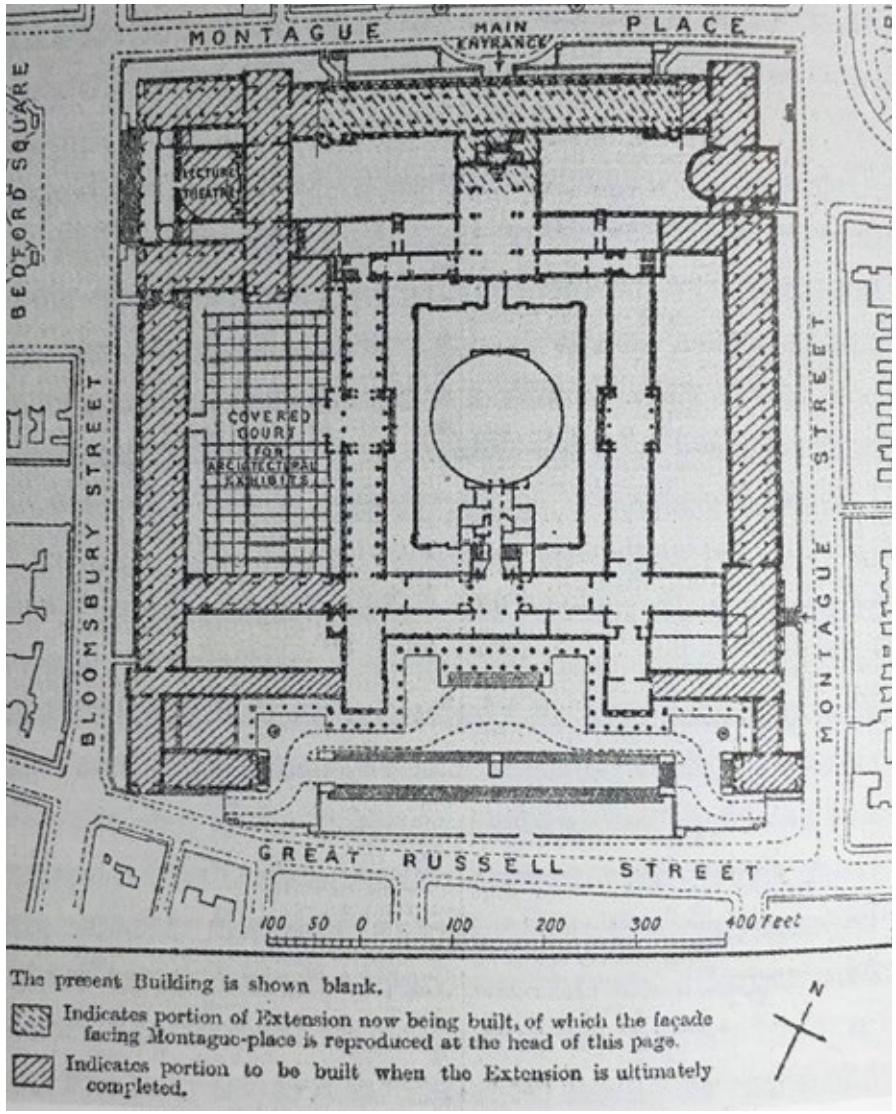
Like Smirke's British Museum, Burnet's new masterplan for the museum itself was to be built in stages, and the first phase was the King Edward VII Galleries on the north side fronting Montague Place **[Plate 2.11]**. Work commenced in 1906, and the foundation stone was laid in 1907 in the presence of King Edward. There was then a delay and works re-commenced in 1910. By 1913, exhibits were being transferred into the new galleries, and the building was opened on 7 May 1914 by King George V and Queen Mary. The new wing housed the galleries of British and Medieval Antiquities, the print room, the map room, and, inset to the south, the North Library.

The façade in Portland stone, ordered by giant order Ionic engaged columns closely referenced Smirke's forecourt design, and possibly also influenced by the architecture of Alexander 'Greek' Thomson, a fellow Glaswegian. The building had two lion sculptures by George Frampton flanking the entrance, but other decorations, including sculptures of art and science above the end bays, were omitted. The façade was held by near-blind projecting bays, or pylons, at either end, designed loosely in the Egyptian style and betraying Burnet's mastery of modern architecture which is reflected in full in the rear elevation which is plainer and in a powerful moderne style, almost entirely unlike the Classical frontage. The interior has a long elevated gallery with coffered ceiling, very Greek, and the staircase leading to it has Art Deco overtones, illustrating Burnet's mastery of both styles and showing his foresight of modern forms to come in the interwar years.

Burnet's North Library, a 'convincing example of Edwardian gusto'[4], was later remodelled by JH Markham of the Office of Works. Burnet's other wings were never built, and the Georgian terraces in the east and west side street survive and have been added to the statutory list. Burnet was received a number of honours following the completion of the galleries; he was knighted, received the gold medal of the Paris Salon in 1922, the gold medal of the Royal Institute of British Architects in 1923, and he was elected Royal Scottish Academician in 1914, associate of the Royal Academy in 1921, and Royal Academician in 1925.

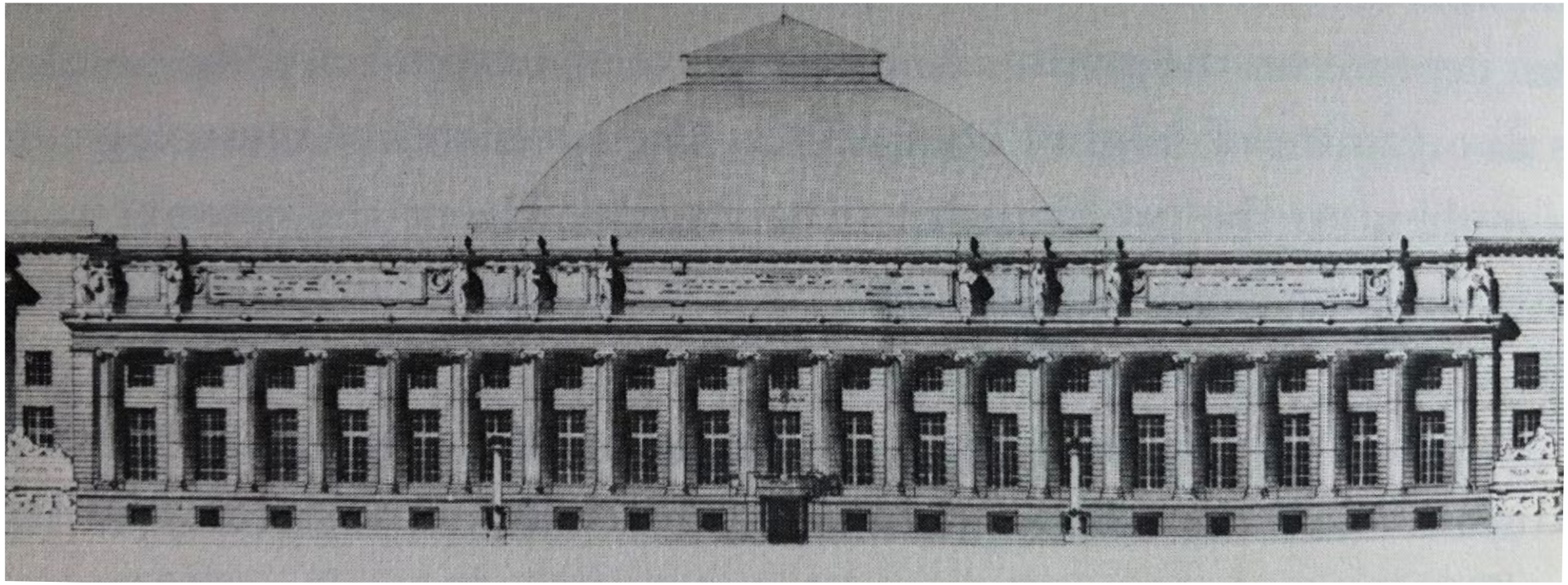


2.9a *1905 masterplan scheme for the British Museum by J. J. Burnet (Mordaunt Crook)*



2.9b *1911 ground floor plan of British Museum masterplan by J. J. Burnet (The Times 21 January 1911)*

2.10 *1905 masterplan for northern avenue by J J Burnet (from Mordaunt Crook)*



2.11 *1905 elevation drawing of King Edward VII Galleries by J. J. Burnet with unexecuted sculptures (Mordaunt Crook)*

2.4 John James Burnet (1857–1938)[5]

Burnet, Sir John James (1857–1938), architect, was born in Glasgow on 31 March 1857, the youngest of the three sons of John Burnet (1814–1901), a successful architect, and his formidable wife, Elizabeth Hay Bennet. He was educated at the Western Academy, Glasgow, and at Blair Lodge. In 1874 he joined the atelier of Jean-Louis Pascal in Paris and in 1875 was the first of several Glasgow architects to enrol at the École des Beaux-Arts. He gained the Diplôme du Gouvernement in 1877 and toured Italy thereafter. On his return he won the competition for the Glasgow Institute of Fine Art with a sophisticated design combining 'Greek with modern French Renaissance'. It demonstrated the absolute mastery of plan and elevation, the precise stonecutting, and the love of sculpture which were to distinguish almost all his work. In 1882 Burnet's father took him into partnership.

Four years later another Pascal élève, John Archibald Campbell (1859–1909), rejoined them, and the firm became Burnet, Son, and Campbell: the work of the two younger partners was to remain indistinguishable until Campbell set up on his own in 1897. The major works of these earlier years were all very Beaux-Arts in style: the Clyde Navigation Trust (1883–6), the Athenaeum (1886), Charing Cross Mansions (1891), all in Glasgow, and the Edinburgh International Exhibition of 1886. But in 1891 at Glasgow's Athenaeum Theatre Burnet began introducing the American elevator building types which were to be copied by others throughout central Glasgow, and moved into a Norman Shaw type of neo-baroque. American and Shaw influences had already been in evidence in his domestic work, notably at Kilneiss, Moniaive, Dumfriesshire (1884), and Corrienessan, Loch Ard, Perthshire (1887).

Burnet's Gothic work was also of exceptional quality: his tall first-pointed Barony Church, Glasgow (1886–99), was among the finest of the period. More innovative, however, were the low-profiled, rather American churches with broad unbuttressed towers, sweeping roofs, and mixed late Gothic and Romanesque motifs first introduced at St Molio's, Shiskine, Arran, in 1886, the finest of which was the Gardner Memorial at Brechin, Forfarshire, built ten years later. In the same period Burnet designed several buildings at Glasgow University and the associated Western Infirmary, mostly in a Scottish Renaissance idiom, for which he was rewarded with the honorary degree of LLD in 1910. In 1913 the university commissioned its tall and magnificent chapel, built as its war memorial in 1923–7.

In 1896 Burnet made the first of several visits to the United States of America (where his brother-in-law James Marwick had useful connections in Illinois and New York), primarily to study laboratory and hospital design. It quickly had wider consequences: his reconstruction of his father's Savings Bank, Glasgow (1898), continuing a programme of aggrandizement begun with the superb banking hall of 1894, reflected his acquaintance with Charles Follen McKim; but his subsequent seven-storey commercial blocks, Atlantic Chambers and Waterloo Chambers (both 1899) and the McGeoch warehouse (1904–6), all in Glasgow, were pioneer buildings of their kind in Britain and demonstrated a wider range of influences, particularly those of Daniel Burnham and Louis Sullivan. These were followed by two Edinburgh department stores, the Civil Service and Professional Supply (1903–7) and Forsyths (1906–10), the latter of which was the first Scottish building to be fully steel-framed. All of these were vigorously neo-baroque in style, with deeply shadowed eaves galleries. They launched the careers of a number of important sculptors, notably George Frampton, Albert Hodge, Phyllis Archibald, William Reid Dick, and Archibald Dawson.

[...]

In 1903–4 the office of works and the trustees of the British Museum selected Burnet to design the Edward VII galleries. Burnet's scheme adopted the Ionic order of Sir Robert Smirke's colonnades but reflected contemporary French and American Beaux-Arts ideas. His giant colonnade of twenty attached columns stretched between pylons demonstrated every possible 'subtlety of varying diameter, intercolumniation, and inclination of verticals' to achieve absolute refinement and repose (W. H. Godfrey, quoted in J. Mordaunt Crook, The British Museum, 1972, 214). Within, the stair was unmatched for its scale and originality. The completion of the galleries in 1914 brought Burnet a knighthood and the bronze medal of the Paris Salon, followed by the gold in 1922; the Royal Institute of British Architects conferred on him its royal gold medal in 1923. In parallel with this cascade of honours Burnet, who had been an associate of the Royal Scottish Academy since 1893,

5 Taken from the Oxford Dictionnary of National Biography

was elected Royal Scottish Academician in 1914, associate of the Royal Academy in 1921, and Royal Academician in 1925.

To build the Edward VII galleries Burnet had established a London office in 1905, taking with him Thomas Smith Tait and recruiting a trusted former assistant, the classical scholar David Theodore Fyfe. The Glasgow office continued separately, from 1909 in partnership with the Paris-trained Norman Aitken Dick (1883–1948). The major London commissions of the pre-war years were the baroque General Accident Building, Aldwych (1909–11), and the classical modern Kodak Building, Kingsway (1910–11), in the latter of which Tait had a hand, and which set the pattern for a great many inter-war commercial buildings. Kodak showed the influence of the American architect Albert Kahn, even more strongly reflected in Glasgow at the Wallace Scott Tailoring Institute of 1913–22.

Tait was taken into partnership after the war. Together Burnet and Tait did much work for the Imperial War Graves Commission in the Middle East, notably at Port Taufiq, Cape Helles, Gallipoli, and Jerusalem. In London they designed the very American Adelaide House, London Bridge (1921–5), the modern French classical Vigo House, Regent Street (1920–25), and the more conservatively Corinthian Lloyds Bank, Cornhill (1925–7), and Unilever House (1929–32). Burnet exercised tighter design control in Glasgow, notably at the city's war memorial, the university's zoology building (1923), and the giant American palazzo of the North British and Mercantile Company (1925–7). In 1926 he was appointed to the original international jury for the League of Nations Building: he voted for the Roman architect Giuseppe Vago. The second jury (1927–9) voted for the design by Burnet's friend and mentor at Pascal's, Henri-Paul Nénot, but appointed him in association with Vago and two other prize-winners, Carlo Broggi and Camille Lefevre; Nénot consulted with Burnet on the radically revised design which resulted from this complex arrangement.

In person Burnet was a courteous Frenchified Scot with a firm belief in the Beaux-Arts 'essentials' and 'classics', and his international outlook was reflected in numerous corresponding memberships. The last decades of his life, and that of his wife, Jean Watt (1864–1949), the daughter of Sir James David Marwick, whom he had married on 18 February 1886, were somewhat difficult. Although possessed of great charm, Lady Burnet was a hypochondriac, and the couple had no children. Burnet suffered acutely from eczema and had to wear a skull-cap and gloves. War, perfectionism, a major theft of sums held on behalf of contractors, and a structural error (the last two both in the Glasgow office) had seriously damaged his finances when ill health obliged him to retire in 1930. Thereafter he moved to Woodhall Cottage, Woodhall Road, Colinton, Edinburgh, where he died on 2 July 1938. He was cremated at Warriston crematorium, Edinburgh, on 5 July 1938. His wife survived him. A bronze bust of Burnet by Sir William Reid Dick is in the possession of the Royal Incorporation of Architects in Scotland.

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3.0 Site Survey Descriptions

3.1 The Setting of the Building

The King Edward VII Galleries has a symmetrical Classical frontage in Portland stone **[Plate 3.1]** which dominates the south side of Montague Place. The building sits opposite the flank elevation of Senate House, a commanding 1930s building with sober 4-storey Portland stone wing on the street and a central inset tower, to designs by Charles Holden in the modern style. To the east and west are garden squares, Russel Square and Malet Street Gardens with Bedford Square beyond, and their mature trees form a break in the urban landscape. Montague Place continues to the west at a more southerly, offset alignment and has Georgian terraced town houses, before it gives way to Bedford Square, also with Georgian terraces, and those on the north side forming a continuation with Montague Place. The King Edward VII Galleries and Senate House are clearly later, large scale institutional insertions into the Georgian landscape of Bloomsbury, further associated with one another through a level street surface of a recent date, and they are at a contrast with the fine-grain Georgian townscape of residential streets with garden squares. The character of this part of Bloomsbury is today defined by this dichotomy of large institutional and more tightly knit, originally residential, buildings.
The setting to the rear of the King Edward VII Galleries is composed of service yards, outbuildings, and the north wing of the British Museum's original quadrangle. The King Edward VII Galleries are connected to the museum by means of a central wing which splits the rear elevation in two. Neither part of the rear elevation can be seen from any public highway, but is only visible obliquely from service yards and from some windows inside the British Museum.

3.1 *Front elevation*

3.2 The Building Externally

The front elevation and the flank elevations would not be affected by the proposals.

The rear elevation is split into two near-equal sections, separated by a taller cross wing which links the King Edward VII Galleries to the earlier British Museum building. Both elements of the rear elevation can only been seen obliquely because the building is hemmed in by other structures, namely a boiler house on the east side and RSHP's recent World Conservation and Exhibitions Centre on the west side **[Plates 3.2 -3.5]**.

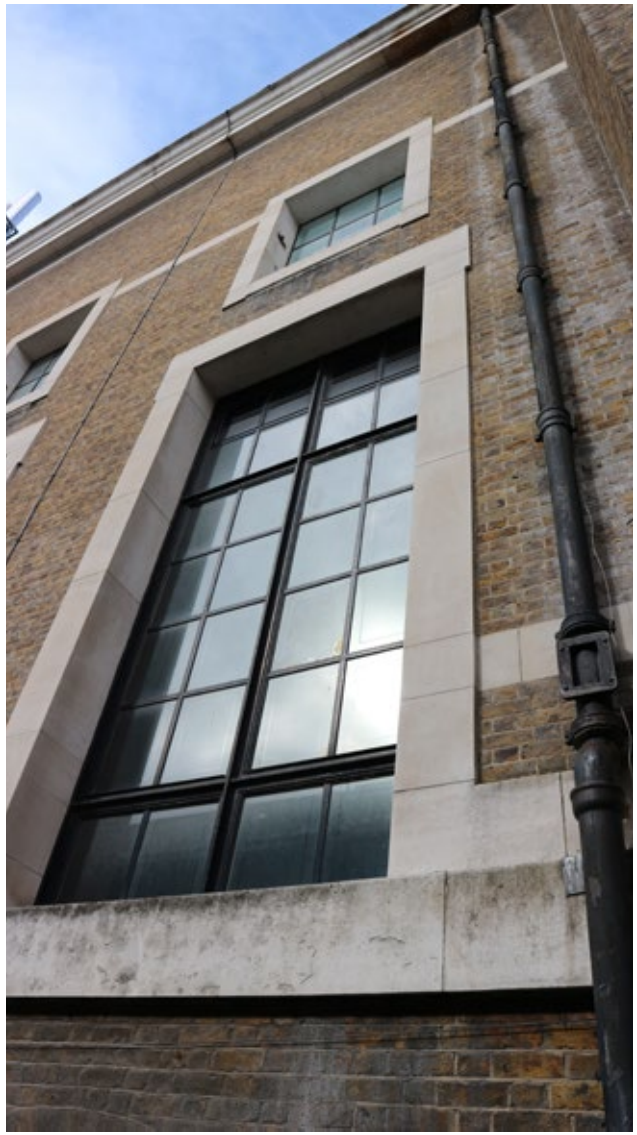
The rear elevation is three storeys tall and elevated in stock brick, designed in a stripped moderne language that lacks the Classical detail of the façade. The fenestration is in 8 bays, with the outer bay to each of the two sections stepping forward to form a curved end bay. Windows at the two upper levels have flush Portland stone dressings. The lowest floor has arched window openings and is partly elevated in glazed brick at the lowest level. The parapet has a cornice.

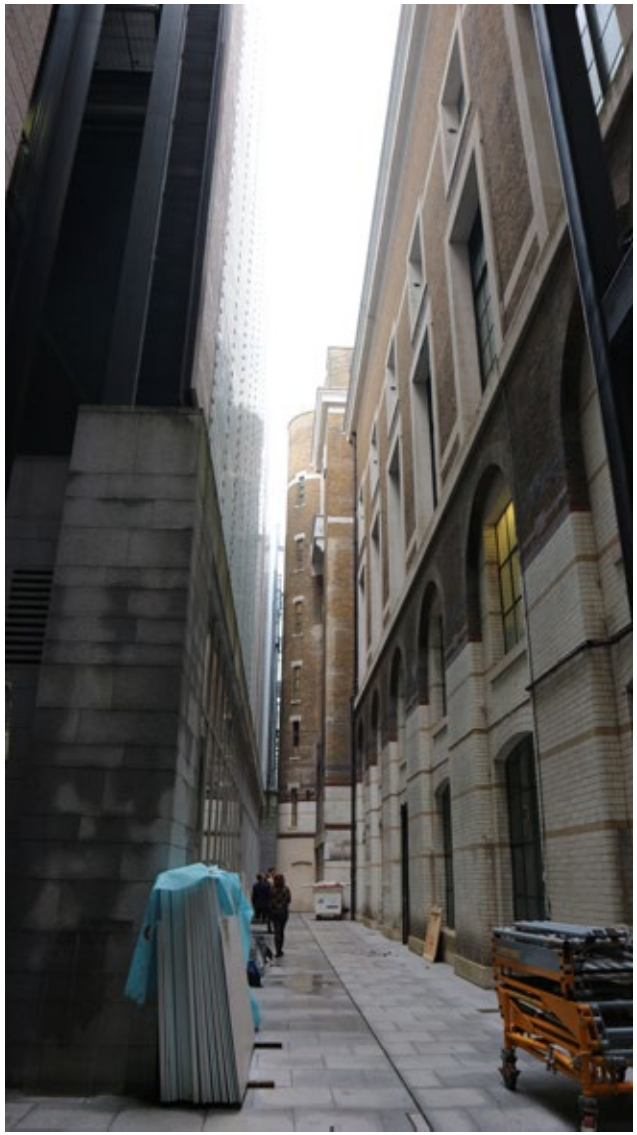
The east elevation has been fitted with a substantial number of service ducts, including three full height metal risers attached to the elevation between bays four and five as counted from the east, and low level services at basement level across much of the eastern rear elevation **[Plates 3.2 and 3.3]**.

Windows at first floor level which would be affected by the proposals are original single glazed metal framed casements arranged in square panes. At the bottom are two bottom-hung double width opening lights, at the centre are two eight-pane side-hung wings, and above this are two seemingly fixed four pane top lights, with each of these three tiers set into its own structural metal frame.

3.3 *Easter rear elevation seen from service road*

3.2 *Rear elevation, eastern part, looking towards connection to North Library*





3.4 *Eastern rear elevation window*

3.5 *Western rear elevation*

3.3 The Building Internally

It is only the upper main gallery at first floor level, gallery 33, which would be affected by the proposals **[Plates 3.6-3.9]**. This space spans the length of the street frontage, and is divided into three sections by regularly spaced columns that mark out a wider central aisle and two outer narrower side aisles. The space has a coffered ceiling. Exhibits are housed either side of a central circular opening to the ground floor, and set into modern glass cases. The floor is a laminate replacement. The fenestration to Montague Place and to the rear is original. Windows to the rear are metal framed very tall casements with plate glass, described in detail in section 3.2, set above built-in radiator casings.

3.6 *Interior of gallery 33*

3.7 *Eastern rear wall*

3.8 *Western rear wall*

3.9 *Window detail*

4.0 Assessment of Heritage Significance

4.1 Introduction

The purpose of this section is to provide an assessment of significance of Victoria House, so that the proposals for change to the buildings are fully informed as to their significance and so that the effect of the proposals on that significance can be evaluated. This assessment responds to the requirement of the National Planning Policy Framework to 'recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance'. The NPPF defines significance as:

> *'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological (potential to yield evidence about the past), architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.*

4.2 Assessment of Significance

The King Edward VII Galleries, constructed as an extension the British Museum in 1906-1914, are of exceptional architectural and historic special interest, and this is reflected in their listing at Grade I, a separate list entry from that of the remainder of the British Museum. The building is an important work by the prominent architectural practice of J. J. Burnet, later Burnet and Tait, and then Burnet, Tait and Lorne, whose designs, many in London, are amongst the best classical and modern buildings in inter-war England. The King Edward VII Galleries is the only executed building of a comprehensive masterplan by Burnet to enlarge the British Museum to fill the entire city block and replace all surviving terraced Georgian houses around the Museum's perimeter with museum accommodation. Whilst the masterplan did not come to pass, the King Edward VII Galleries were built, and housed part of the expanding museum's collection, namely British and Medieval Antiquities, the print room, the map room, and, inset to the south, the North Library.

In more detail, the building has the following hierarchy of significance (with a focus on those elements which would be affected by the proposals):

Of **high significance** are:

- the decorative main street elevation in Portland stone with metal fenestration (not affected by the proposals)
- the staircase and entrance hall (not affected by the proposals), and the main exhibition space, Gallery 33

Of **medium significance** are:

- the flank and rear elevations in simpler forms which are hidden from public view and whose setting has been altered by the addition of a service outbuildings and a modern conservation building

Detracting from the building's heritage significance are:

- the many elements of ductwork attached or adjacent to the rear elevation
- elements of the setting of the building, most notably the boiler house and other modern outbuildings to the south of the east wing

The **British Museum** is a building which is, somewhat surprisingly, separately listed at Grade I. Its heritage significance as the nation's foremost museum of archaeology, ethnography and artefacts from across the world is of exceptional value, both for its collections, its history and architecture. The relative significance of the various parts of the museum is set out in the Conservation Management Plan by Purcell Miller Tritton (2008) and does not need to be replicated here. The elements of the museum that face the rear elevation of the King Edward VII Galleries, the north elevations of the north wing of Smirke's building, are unadorned and partly altered stock brick elevations designed to be hidden from view. They are of no more than medium significance.

The **Bloomsbury Conservation Area** is large and takes in Georgian terraced streets and garden squares developed by the Earl of Bedford, large university buildings of the 20th century, and commercial buildings including hotels on Southampton Row leading to Euston Station. The site is in sub-area 3 which includes the British Museum and university buildings including Senate House, and this is defined by large-footprint, handsome buildings in a variety of styles which clearly express their function and stand in contrast to the tighter grain of surrounding terraced Georgian houses which otherwise dominate Bloomsbury.

5.0 Assessment of the Proposals

The proposals have been drawn up by Nex Architects and are shown in their application drawings and explained in their Design and Access Statement.
It is proposed to create a temporary ventilation arrangement for Gallery 33 in the King Edward VII building. This would allow the repair of the existing ventilation services which have failed due to water ingress and resultant mould growth. The temporary arrangement would be time limited to 5 years and entail the addition of ducts to the rear elevation at first floor level, and the temporary removal of a small number of glass panes where the ducts would serve the galleries, with louvers installed in their stead. This would allow the galleries to open to the public which is not possible without forced ventilation, and enable to long term repair of the existing concealed ventilation system.

5.1 External Proposals and their Impact

Proposals:
It is proposed to add temporary service ducts to the first floor level of the rear elevation of the King Edward VII Galleries. This would be in the form of three pairs of air intake ducts to the southeast elevation at bays 2, 3 and 4 (counted form the east) set into their lower, bottom hung lights, and two air extract ducts to the south-western elevation into bays 2 and 3 (counted from the west) set into the fixed top lights. The ducts would terminate within the metal framing of the windows and necessitate the temporary removal of some plate glass panes; those could be reinstated once the proposed temporary ducting can be removed, namely post-repair of the permanent air handling system. The ducts would be substantially self-supporting and have some fixings into the brickwork rear elevation, only as necessary. The ducts on the south-eastern elevation would connect to existing ductwork at basement level.

Impact:
The impact on the exterior of the building would be temporary and concealed from street view. The south-eastern elevation has already been fitted with a large amount of ductwork, whilst the southwest elevation currently has no ductwork. These elevations face back-of-house areas which are not accessible to the public, and the external alterations would not be seen other than by a limited number of service personnel. Without doubt, however, the addition of these ducts and the small amount of fixings would alter the appearance and small elements of the fabric of both parts of the rear elevation, and this would cause some harm to heritage significance. This harm would be temporary and at the low end of the less than substantial spectrum, because it would be largely concealed. Impacts on the setting of the Grade I listed British Museum (BM) building to the south would be minimal, because of the concealed and temporary nature of the proposals, and the limited interest of the back of house elevations of the BM. There would be no impacts on the character or appearance of the Bloomsbury Conservation Area because of the location of the external changes away from public view.

5.2 Internal Proposals and their Impact

Proposals:
The only internal change would be the temporary removal of a small number of plate glass panes from 5 windows on the rear elevation, and their replacement with louvered inserts. There would be six of these small scale louvers in bottom lights of the south-eastern elevation, and four in the top lights on the south-western elevation. Once the repair works to the concealed air handling system are complete these louvers would be removed and the glass panes reinstated.

Impact:
The proposals would result in a small scale temporary alteration to the interior of Gallery 33 which would have a minimal impact. Whilst this impact would be harmful, it would be at the very low end of the less than substantial spectrum.

5.3 Justification of the Proposals & Conclusion

The Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) sets out a duty by the decision maker to have special regard to the desirability to preserve listed buildings and their settings, and preserve or enhance the character or appearance of conservation areas (sections 16, 66 and 72 of the Act). This is reflected in the London Plan (policy HC1). The Camden local plan (policy D2) and the NPPF (paragraph 202) both allow for harm to heritage significance to be outweighed by public benefits, with the proviso set out in the NPPF that 'great weight' has been given to the conservation of affected heritage assets, and that harm has been addressed with 'clear and convincing' justification.

The King Edward VII Galleries would be substantially preserved, and there would be no harm to the setting of the British Museum or the character and appearance of the Bloomsbury Conservation Area. There would be a small amount of less than substantial harm cause by the temporary addition of external ducts, their fixings, and their small internal manifestations, caused to the rear elevation (internally and externally) of the Kings Edward VII building. This impact is not avoidable and without it, it will not be possible to affect the long term beneficial repair of the existing concealed air conditioning system that serves this gallery. Gallery 33 requires forced ventilation in order to operate and accommodate public access in numbers that are needed to provide a normal service.

Therefore, the public benefit that would be brought about by these proposals is substantial and two-fold:

- the temporary ventilation system would allow the public to access gallery 33, an important space in the British Museum that has key exhibits of the China and South Asia collection and that is currently closed because of the failure of the existing air handling system;
- the proposals would enable a well-planned, considered and long-lasting repair of the permanent concealed air handling system.

These public benefits comfortably outweigh the temporary, low level less than substantial harm caused to the rear elevation of the King Edward VII building. For this reason, they comply with the Camden Plan (D2) and the NPPF (202), and these are material considerations meaning that the requirements of the Act (sections 16, 66 and 72) and the London Plan (Policy HC1) are also met.

Appendix I - Statutory List Description

The British Museum King Edward VII Galleries and attached wall and lions
(Formerly Listed as: GREAT RUSSELL STREET (North side) King Edward VII Gallery, British Museum)

Grade: I
List Entry Number: 1322129
Date first listed: 24-Oct-1951
Date of most recent amendment: 11-Jan-1999
Statutory Address: THE BRITISH MUSEUM KING EDWARD VII GALLERIES AND ATTACHED WALL AND LIONS, MONTAGUE PLACE

GV I

Museum gallery forming part of The British Museum (qv). 1905-14. By Sir John Burnet, assisted by Thomas Tait. Portland stone and marble.

EXTERIOR: 2 storeys and semi-basement, 21 bays. Symmetrical Edwardian Beaux Arts facade with a screen of attached Ionic columns on a podium and flat, higher square erections at the angles. Commercial metal framed windows, on both floors, between the columns. Granite door frame with inner frame of enriched marble. Above this an inscribed foundation stone and gilded wreaths on the flanking columns. Cornice with protruding carved lions' heads at intervals. Deep blocking course with guttae at intervals and parapet above having, at intervals, carved crowns with the initials ER under.

INTERIOR: in fine neo-Classical style. Low top-lit hall. Stair lined with Greek marble; a pair of black columns with a large Buddha between in the well and a gilt bronze lift cage to one side. Galleries in trabeated Smirke style; stripped Classical detailing. North Library, behind the stair, altered from Burnet's original mannerist concept.

SUBSIDIARY FEATURES: attached stone wall to areas terminating at either side of the main entrance with carved stone lions, having crossed front paws, by Sir George Frampton.

Listing NGR: TQ2997681722

Appendix II - Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

[...] in considering whether to grant listed building consent for any works the local planning authority or 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.

Similarly, section 66 of the above Act states that:

In considering whether to grant 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.

Similarly, section 72(l) of the above Act states that:

[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Local Policy

Camden Local Plan
The local plan was adopted by the Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough. The following policies are relevant:

Design

7.1 Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. The National Planning Policy Framework establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning.

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 natural 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 a 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.

Excellence in design

The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under "Policy G1 Delivery and location of growth" will be provided through high quality contextual design.

Local context and character

7.2 The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- character, setting, context and the form and scale of neighbouring buildings;
- the character and proportions of the existing building, where alterations and extensions are proposed;
- the prevailing pattern, density and scale of surrounding development;
- the impact on existing rhythms, symmetries and uniformities in the townscape;
- the composition of elevations;
- the suitability of the proposed design to its intended use;
- inclusive design and accessibility;
- its contribution to public realm and its impact on views and vistas; and
- the wider historic environment and buildings, spaces and features of local historic value.

7.3 The Council will welcome high quality contemporary design which responds to its context, however there are some places of homogenous architectural style (for example Georgian Squares) where it is important to retain it.

7.4 Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. Character is about people and communities as well as the physical components. How places have evolved historically and the functions they support are key to understanding character. It is important to understand how places are perceived, experienced and valued by all sections of the community. People may value places for different reasons, often reflecting the services or benefits they provide for them. In addition, memory and association are also a component of how people understand a place. All of these values and experiences are part of understanding the character of a place. Planning applications should include a Design and Access Statement which assesses how the development has been informed by and responds to local context and character.

7.5 Design should respond creatively to its site and its context including the pattern of built form and urban grain, open spaces, gardens and streets in the surrounding area. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions and materials.

7.6 The Council has two sets of documents which describe the character and appearance of areas and set out how we will preserve or enhance them. Each conservation area has a Conservation Area Statement or Appraisal and Management Strategy. These detailed documents have been developed with the relevant Conservation Area Advisory Committee and are adopted supplementary planning documents. For areas outside of conservation areas the Council commissioned the Camden Character Study to identify and record their character. This is not a formal supplementary planning document. These documents can help developers to inform their understanding of the specific character of the area in which their proposals are located. "Policy D2 Heritage" provides further guidance on the preservation and enhancement of the historic environment. When assessing design, we will also take into account guidance contained within supplementary planning document Camden Planning Guidance on design. For areas where Neighbourhood Plans are being prepared, these documents will form a valuable source of information on the character of the local area.

Sustainable design and durability

7.7 The Council expects development to be sustainable in design and construction. Development should be consistent with the policies set out in section 8 of this plan on sustainability and also consistent with Camden Planning Guidance on sustainability.

7.8 Design should be durable in construction and where appropriate should be flexible and adaptable for a range of uses over time, a quality known as robustness. Robustness is influenced by factors including the size and shape of rooms, points of access and the depth of floorplates. The overall quality of a building is also a consideration as buildings with character and charm are more likely to be retained and adapted.

Details and materials

7.9 Architectural detailing should be carefully integrated into a building. In new development, detailing should be carefully considered so that it conveys quality of design and creates an attractive and interesting building. Architectural features on existing buildings should be retained wherever possible, as their loss can harm the appearance of a building by eroding its detailing. The insensitive replacement of windows and doors can spoil the appearance of buildings and can be particularly damaging if the building forms part of a uniform group.

7.10 Schemes should incorporate materials of a high quality. The durability and visual attractiveness of materials will be carefully considered along with their texture, colour, tone and compatibility with existing materials. Alterations and extensions should be carried out in materials that match the original or neighbouring buildings, or, where appropriate, in materials that complement or enhance a building or area.

[...]

Heritage

Camden's heritage

7.39 Camden has a rich architectural heritage with many special places and buildings from throughout Camden's history (see "Map 4: Heritage and Archaeological Sites" on page 210). 39 areas, covering much of the borough, are designated as conservation areas, recognising their special architectural or historic interest and their character and appearance. We have prepared conservation area statements, appraisals and management strategies that provide further guidance on the character of these areas. We will take these documents into account as material considerations when we assess applications for planning permission in these areas.

7.40 Over 5,600 buildings and structures in Camden are nationally listed for their special historical or architectural interest and 53 of the borough's squares are protected by the London Squares Preservation Act 1931. In addition, 14 open spaces in Camden are on Historic England's Register of Parks and Gardens. The Council also maintains a local list of over 400 non-designated heritage assets. Camden also has a generally well-preserved archaeological heritage, with 13 identified archaeological priority areas, although this can be vulnerable to development and changes in land use.

7.41 The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings.

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

Designed 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 uses 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 is 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 the total or substantial demolition of an unlisted building that makes a positive contribution to the character or 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:

i. resist the total or substantial demolition of a listed building;

j. 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; and

k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Enhancing the historic environment

7.42 The Council has a proactive approach to conserving heritage assets. In addition to the application of Local Plan policies the Council protects the historic environment through the following areas of work:

• Conservation Area Management Strategies: The Council works with the Conservation Area Advisory Committees to update and support the implementation of the strategies.

• Heritage at Risk: The Council identifies buildings and structures at risk and proactively seeks to conserve and where required put them back into viable use, including identifying sources of funding.

• Local list of undesignated heritage assets: The Council introduced the local list in 2015 and it will be updated annually.

• Guidance: The Council has adopted detailed guidance for the preservation of heritage assets in the supplementary planning document Camden Planning Guidance on design, and Retrofitting Planning Guidance (for sustainability measures in historic buildings). The Council updates planning guidance as required.

• Area based work: Conservation and enhancement of the historic environment is a key objective of area action plans and the Site

Allocations. The Fitzrovia Area Action Plan for example sets principles for developing key sites which retain and enhance the setting of listed buildings.

7.43 The Council recognises that development can make a positive contribution to, or better reveal the significance of, heritage assets and will encourage this where appropriate. Responding appropriately to the significance of heritage assets and its setting can greatly enhance development schemes (for example, King's Cross Central)

Designated heritage assets

7.44 Designated heritage assets include listed buildings and structures, registered parks and gardens and conservation areas. The Council will apply the policies above and will not permit harm to a designated heritage asset unless the public benefits of the proposal outweigh the harm. Further guidance on public benefits is set out in National Planning Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20140306). Any harm to or loss of a designated heritage asset will require clear and convincing justification which must be provided by the applicant to the Council. In decision making the Council will take into consideration the scale of the harm and the significance of the asset.

7.45 In accordance with the National Planning Policy Framework the Council will only permit development resulting in substantial harm to or loss to a grade II listed building, park or garden in exceptional circumstances and will only permit development resulting in substantial harm to or loss to a grade I and II* listed building, grade I and II* registered park or garden in wholly exceptional circumstances.

Conservation areas

7.46 In order to preserve or enhance important elements of local character, we need to recognise and understand the factors that create that character. The Council has prepared a series of conservation area statements, appraisals and management plans that assess and analyse the character and appearance of each of our conservation areas and set out how we consider they can be preserved or enhanced. We will take these into account when assessing planning applications for development in conservation areas. We will seek to manage change in a way that retains the distinctive characters of our conservation areas and will expect new development to contribute positively to this. The Council will therefore only grant planning permission for development in Camden's conservation areas that preserves or enhances the special character or appearance of the area.

7.47 The character of conservation areas derive from the combination of a number of factors, including scale, density, pattern of development, landscape, topography, open space, materials, architectural detailing and uses. These elements should be identified and responded to in the design of new development. Design and Access Statements should include an assessment of local context and character and set out how the development has been informed by it and responds to it

7.48 Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development which is outside of conservation areas, but visible from within them. This includes high or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.

Use

7.53 Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment. Two uses of particular importance to the character of conservation areas are pubs and local shops, especially when they are in located in historic buildings. The Council will protect these uses as set out in "Policy C4 Public houses" and "Section 9 Town centres and shops".

Details

7.54 The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such

as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the original. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring houses and streets to inform the restoration. The Council will consider the introduction of Article 4 Directions to remove permitted development rights for the removal or alterations of traditional details where the character and appearance of a conservation area is considered to be under threat.

Landscape

7.55 The value of existing gardens, trees and landscape to the character of the borough is described in "Policy A2 Open space" and they make a particular contribution to conservation areas. Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area.

Sustainable design and retrofitting

7.56 Historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival. In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed up against the degree to which proposals will change the appearance of the building, taking into consideration the scale of harm to appearance and the significance of the building. Applicants are encouraged to follow the detailed advice in Camden's Retrofitting Planning Guidance, the energy efficiency planning guidance for conservation areas and the Historic England website.

Listed Buildings

7.57 Camden's listed buildings and structures provide a rich and unique historic and architectural legacy. They make an important and valued contribution to the appearance of the borough and provide places to live and work in, well known visitor attractions and cherished local landmarks. We have a duty to preserve and maintain these for present and future generations.

7.58 The Council has a general presumption in favour of the preservation of listed buildings. Total demolition, substantial demolition and rebuilding behind the façade of a listed building will not normally be considered acceptable. The matters which will be taken into consideration in an application for the total or substantial demolition of a listed building are those set out in the National Planning Policy Framework.

7.59 In order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest. Consent is required for any alterations, including some repairs, which would affect the special interest of a listed building.

7.60 The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development. While the setting of a listed building may be limited to its immediate surroundings, it can often extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. Applicants will be expected to provide sufficient information about the proposed development and its relationship with its immediate setting, in the form of a design statement.

Access in listed buildings

7.61 Where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. The Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution. We will expect design approaches to be fully informed by an audit of conservation constraints and access needs and to have considered all available options. The listed nature of a building does not preclude the development of inclusive design solutions and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.

Sustainability measures in listed buildings

7.62 Proposals that reduce the energy consumption of listed buildings will be welcomed provided that they do not cause harm to the special architectural and historic interest of the building or group. Energy use can be reduced by means that do not harm the fabric or appearance of the building, for instance roof insulation, draught proofing, secondary glazing, more efficient boilers and heating and lighting systems and use of green energy sources. Depending on the form of the building, renewable energy technologies may also be installed, for instance solar water heating and photovoltaics.

Bloomsbury Conservation Area

Bloomsbury Conservation Area covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east. The initial designation of Bloomsbury as a conservation area in 1968 sought to protect elements of development from the Georgian and earlier eras, but excluded areas where there had been significant later redevelopment. There have been numerous subsequent extensions that have mostly reflected a growing appreciation of Victorian and Edwardian and high quality 20th century architecture.

Bloomsbury Conservation Area Appraisal and Management Strategy

The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted in April 2011. This document describes the character of the British Museum and associated surroundings as follows:

Sub Area 3: University of London/British Museum

5.27 This area is dominated by large-scale institutional buildings. To the north of the area is the University of London precinct and its associated colleges and faculties. To the south is the British Museum which occupies almost an entire street block north of Great Russell Street and south of Montague Place. As well as some exemplary 18th and 19th century buildings, there are several examples of 20th century architecture of international repute. The original street pattern is retained in most part, but 20th century development has involved the loss of some earlier, small-scale domestic terraces. In most cases, later buildings maintain and define street frontages, despite their larger scale and increased bulk and mass. There are a series of pedestrianised spaces and courtyards of varying scales between the buildings giving a quieter but nonetheless active campus atmosphere contrasting with the busy streets.

[...]

The British Museum

5.46 The British Museum is a cultural institution of international importance, occupying a major ensemble of outstanding grade I listed buildings which make a significant contribution to the character and appearance of this the Conservation Area as a whole. The museum site covers the majority of the street block south of Montague Place. The principal South Front addresses Great Russell Street with a secondary frontage to Montague Place. The east side of the museum has a partial frontage to Montague Street. The museum was built in stages as its collections expanded. However, both historic and modern development is of a large scale, although large portions of the building are not visible from the public realm due to the backland nature of much of the site; the site is effectively shielded from the east and west by the terraced houses lining Montague Street and Bedford Square. For instance, the Round Reading Room at the heart of the site cannot be seen in long views. However the roof of the 1990s Great Court can be detected in views from Russell Square or Bedford Square. The Great Court scheme designed by Foster and Partners opened up the centre of the site to the public and created a pedestrian link during opening hours between Great Russell Streetand Montague Place. The principal building is a significant neo-classical early 19th century building: designed by Sir Robert Smirke in a Greek Revival style, it was started in 1823. The centrepiece is a pedimented classical colonnade of an Ionic order, reached up a grand flight of steps. The symmetrical composition is completed by two projecting ranges which enclose the large front forecourt. Set back from the frontage behind tall

railings and a mature line of trees, this frontage forms an impressive landmark along Great Russell Street, and provides vistas from the south along narrow streets such as Museum Street, Coptic Street and Bury Place. 5.47 On the north side of the museum, the King Edward VII Galleries were built in 1906-14 to the designs of John James Burnet. The building presents itself to Montague Place as a large-scale frontage in line with the university buildings on the northern side of the street. The façade is constructed from Portland stone and marble with vertically proportioned metal-framed windows The symmetrical frontage is set back from the street behind a slightly raised forecourt. It comprises two tall storeys raised on a semibasement and has a line of Ionic columns supporting an entablature with projecting cornice and a pair of lion statues flanking the entrance. Demolition has recently taken place of a pair of 1971 neo-Georgian townhouses to make way for a new North-West wing designed by Rogers Stirk Harbour and Partners.

Regional Policy

The London Plan (March 2021)
In March 2021 the Mayor adopted The London Plan. This is operative as the Mayor's spatial development strategy and forms part of the development plan for Greater London. Policies pertaining to heritage include the following:

Policy HC1 Heritage Conservation and Growth

(C) 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. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (July 2021). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'.

At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

> *a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
>
> *b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
>
> *c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

> *195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 197 of the NPPF identifies the following criteria in relation to this:

> *a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
>
> *b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
>
> *c) the desirability of new development making a positive contribution to local character and distinctiveness*

With regard to applications seeking to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), paragraph 198 states that:

> *...local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.*

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 199 the framework states the following:

> *...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.*

The Framework goes on to state at paragraph 200 that:

> *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
>
> *a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
> *b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 201 of the NPPF states that:

> *...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total 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 uses of the site; and*
>
> *b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
>
> *c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
>
> *d) the harm or loss is outweighed by the benefit of bringing the site back into use*

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following;

> *202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) 2021 and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- **archaeological interest**: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **architectural and artistic interest**: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- **historic interest**: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 199-203 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 199-203) apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all,

for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms 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). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 200).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

Donald Insall Associates