



HISTORIC BUILDINGS & PLACES

FAO: Joshua Howitt

Address: The National Gallery, Trafalgar Square, London WC2N 5DN
Application Ref: 22/04895/LBC – Re-consultation

Proposal: Revised plans - External and internal alterations, including remodelling of external gates, replacement glazing and adaption of the loggia and internal lobby to the Sainsbury Wing. Alterations to the southwest part of the Wilkins Building, including existing railings, lawn and wall; with new entrance onto Trafalgar Square to the Research Centre and Members Room, with related internal alterations. New basement link under Jubilee Walk; and alterations to the Pigott Education Centre, including new external window on the facade.

Statutory Remit: Historic Buildings & Places (HB&P) is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). It is one of the National Amenity Societies and, as such, is a consultee on all Listed Building Consent applications involving an element of demolition as required by the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. We are concerned with historic assets of all types and all ages, including planning applications affecting historic buildings in conservation areas and undesignated heritage.

Comments: Thank you for re-consulting HB&P on this application. I apologise for the delay in responding. Our Trustees have reviewed the amended plans and welcome certain elements of the revised proposal, such as the retention and reuse of the Egyptian columns and the ‘mannerist’ cladding to the pillars. But taking all things into consideration, HB&P remains concerned about the level of harm the proposed alterations would have on the significance and integrity of the Grade I listed Sainsbury Wing, as outlined in our original submission.

We do not doubt the infelicities of the current layout and day-to-day operation of the National Gallery. There are fundamental issues with how it is entered, security checks, where the baggage and cloakroom facilities are situated, and how the public leave the building – which are all compromises that have evolved over time in a piecemeal response to visitor pressure, rather than being wholistically managed. These issues should be carefully analysed in the light of the sensitivity of the spaces and the buildings and not to consider the architecture ‘inconvenient’, as has happened with Wilkins’ portico entrance and Venturi Scott Brown’s design. It appears that the real, deep-seated problems of visitor circulation and experience are not going to be fully addressed by this scheme, and thus the public benefits would not outweigh the level of harm caused.

HB&P therefore recommends the application is withdrawn and we encourage the National Gallery Trustees to explore a wider range of solutions that will better respect the buildings they have and broaden the visitor experience within the complex. Given the Gallery’s ownership of St Vincent House to the rear of the Sainsbury Wing, perhaps a more radical approach to the NG200 programme is needed, as has happened, for example, with the recently completed new entrance pavilion and visitor sequence to the Museumsinsel in Berlin.

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We remind you of the relevant NPPF (2021) policy considerations, particularly:

- Paragraph 199: “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”.
- Paragraph 200: “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.”

We provide these comments for your consideration in assessing the application and I would be grateful if we could be informed of the outcome when this becomes available.

Regards

Ross Anthony

Case Work



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