

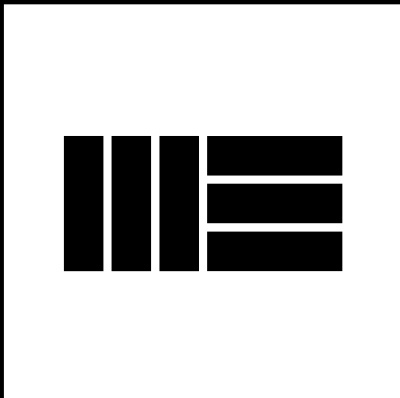
PLANNING STATEMENT

EAST ROAD BUILDING THE BRITISH MUSEUM
GREAT RUSSELL STREET, LONDON WC1B 3DG

ON BEHALF OF THE TRUSTEES OF THE BRITISH MUSEUM

APRIL 2023

PD13794: CM / GF / GA / EM



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1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement (hereafter referred to as “the Statement”) has been prepared by Montagu Evans LLP to support the submission of applications for planning permission and listed building consent (hereafter referred to as “the / this Application”) for an Engineering Support Hub at East Road Building (“ERB”), The British Museum, Great Russell Street, London WC1B 3DG (“the Site” or “the Building”) (Title Number NGL858468).
- 1.2 The Application is submitted on behalf of the Trustees of the British Museum (“the Applicant” or “the Museum”) to the London Borough of Camden (“the Council” or “LB Camden”) as the Local Planning Authority (“LPA”).
- 1.3 Full planning permission and listed building consent is sought for (“Proposed Development” / “Scheme”):
- “Demolition of existing building and two storey structures on East Road (to the rear of 9-11 Montague Street and 43 Russell Square) and erection of new two storey building, plus basement and associated works to provide plant and welfare accommodation ancillary to the Museum”.*
- 1.4 The existing East Road Building is raised above ground level and comprises a single storey. The Building is of late 20th century and has been used as workshops and stores ancillary to the operation of the Museum (Use Class F1(c), formerly Use Class D1).
- 1.5 The British Museum is a Grade I listed building occupying a street block within the Bloomsbury Conservation Area. The existing East Road Building is located adjacent to listed terraced properties on Montague Street (Grade II) and is considered listed by virtue of attachment to the Grade II listed No. 8 Montague Street.
- 1.6 The Site presents a number of planning, design and heritage considerations which have been carefully considered in the context of the Proposed Development, explored throughout this Statement.
- 1.7 The Proposed Development has been developed in close consultation with Officers from the LB Camden and Historic England.
- 1.8 The Proposed Development comprises the following elements:
- Demolition of the existing single storey East Road Building (258 sqm GIA);
 - Demolition of two storey structures (referred to as “Green Huts”) (100.26 sqm GIA); and
 - Erection of building spanning two storeys plus a basement level (below ground) for Engineering Support Hub (682.4 sqm GIA), which includes:
 - Plant infrastructure (422.8 sqm GIA); and
 - Welfare / support accommodation (259.5 sqm GIA).
- 1.9 The Proposed Development will house the Museum’s carpenters, locksmiths and electrical workshops as well as plant infrastructure supporting the Museum’s fire sprinkler, electrical and life safety systems.
- 1.10 A suite of technical reports has been prepared and submitted as part of this planning Application. The Planning Statement is one of those reports and provides a detailed planning policy analysis, considering the Proposed Development in the light of the relevant policies of the Statutory Development Plan, as well as other material considerations.
- 1.11 This Planning Statement demonstrates that the proposed Scheme will deliver the following benefits:
- A new building of a high architectural quality;
 - Enhancements to bio-diversity;
 - Sustainable design;
 - New permanent back-of-house accommodation for staff; and
 - Removal of poor quality temporary buildings.

- 1.12 The Proposed Development is in accordance with the national, regional and local planning policy, including other material considerations such as emerging policy and guidance. The Scheme would provide a number of planning benefits over and above the existing situation.

2.0 INTRODUCTION

2.1 This Planning Statement (“the Statement”) has been prepared by Montagu Evans LLP on behalf of The British Museum (“the Applicant” or “the Museum”) to accompany applications for full planning permission and listed building consent for an Engineering Support Hub at East Road Building (“ERB”), The British Museum, Great Russell Street, London WC1B 3DG (“the Site” or “the Building”) (Title Number NGL858468).

2.2 Full Planning Permission is sought for (“Proposed Development” / “Scheme”):

“Demolition of existing building and two storey structures on East Road (to the rear of 9-11 Montague Street and 43 Russell Square) and erection of new two storey building, plus basement and associated works to provide plant and welfare accommodation ancillary to the Museum”.

2.3 The Site falls within the jurisdiction of London Borough of Camden (“LB Camden” or “the Council”) (within Bloomsbury Ward) and contained within the Museum’s estate. The Site is bounded by the rear gardens of Montague Street (under the Museum’s ownership) to the north, east and south. To the west, the Site is adjacent to East Road, a private road serving the Museum.

2.4 The British Museum estate spans over a total area of approximately 9.2 hectares. The part of which this Application relates to is located within the northeast portion of the Museum’s estate and has a site area of 681 sqm.

2.5 The existing East Road Building is raised above ground level and comprises a single storey. The Building is late 20th century and has been used as workshops and stores ancillary to the operation of the Museum (Use Class F1(c), formerly Use Class D1).

2.6 The British Museum is a Grade I listed building occupying a street block within the Bloomsbury Conservation Area. The existing East Road Building is located adjacent to listed terraced properties on Montague Street (Grade II) and is considered listed by virtue of attachment to the Grade II listed No. 8 Montague Street. A detailed description of the listed status and heritage significance of the ERB Building is set out in the Heritage Statement which accompanies the Application.

Overview of Scheme

2.7 The Proposed Development includes the following works:

- Demolition of the existing single storey East Road Building (258 sqm GIA);
- Demolition of two storey structures (referred to as “Green Huts”) (100.26 sqm GIA); and
- Erection of building spanning two storeys plus a basement level (below ground) for Engineering Support Hub (682.4 sqm GIA), which includes;
 - Plant infrastructure (422.8 sqm GIA); and
 - Welfare / support accommodation (259.5 sqm (GIA)).

2.8 The floorspace uplift generated by the Proposed Developed is 324.11 sqm (GIA).

2.9 The Proposed Development will house the Museum’s carpenters, locksmiths and electrical workshops as well as plant infrastructure supporting the Museum’s fire sprinkler, electrical and life safety systems.

Purpose and Format of Planning Statement

2.10 The purpose of this Planning Statement is to provide information to allow an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.

2.11 The Statement sets out how the relevant planning policies and all other material considerations to the determination of the Application have been taken into account in the evolution of the Scheme. It also sets out how the Application is compliant with all such considerations, to help inform the overall planning balance judgement.

2.12 The Statement brings together the findings of the technical reports identified in **Table 2.1** below. The scope of supporting information contained within the technical reports has been established with regard to the national and local list requirements. Therefore, this Statement should be read in conjunction with the accompanying documents and drawings submitted with the Application which comprise:

Table 2.1 – Document Schedule.

Doc No.	Document Title	Author
1.	Document Schedule	Montagu Evans
2.	Completed Application Form (with Ownership Certificates)	Montagu Evans
3.	Covering Letter	Montagu Evans
4.	Site Location Plan (1:1250)	Wright & Wright
5.	Site Plan (1:500)	Wright & Wright
6.	Drawing Issue Sheet	Wright & Wright
7.	Application Drawings	Wright & Wright
8.	Design and Access Statement (including Delivery, Waste and Servicing Strategy)	Wright & Wright
9.	Community Infrastructure Levy Form	Montagu Evans
10.	Planning Statement	Montagu Evans
11.	Heritage Statement	Montagu Evans
12.	Schedule of Works	Wright & Wright
13.	BREEAM Pre-Assessment	Eight Versa
14.	Energy and Sustainability Statement	Steensen Varming
15.	Environmental Noise Impact Assessment	Encon
16.	Daylight and Sunlight Impacts Assessment	Gordon Ingram Associates
17.	Air Quality Assessment	Encon
18.	Basement Impact Assessment	Alan Baxter
19.	Drainage Strategy Statement	Alan Baxter
20.	Archaeological Desk-Based Assessment	Pre-Construct
21.	Preliminary Ecological Appraisal	Writtle Forest
22.	a) Tree Survey and Tree Constraints Plan b) Arboricultural Method Statement c) Arboricultural Implication Assessment	Writtle Forest
23.	Lighting Assessment	Steensen Varming

2.13 The structure of this Statement is as follows:

- **Section 3.0** provides background and planning history of the Site and its surrounding context;
- **Section 4.0** outlines the Museum's need and justification for the Proposed Development;
- **Section 5.0** sets out the details of the Proposed Development;
- **Section 6.0** summarises the legislation and planning policy framework relevant to the Site;
- **Section 7.0** undertakes an assessment of proposals against planning policy;
- **Section 8.0** outlines the planning benefits of the Scheme; and
- **Section 9.0** provides a balanced conclusion, recommending planning approval.

3.0 SITE AND SURROUNDING AREA

3.1 The following section provides an overview of the Site, describing the existing buildings in the context of the surrounding area, including the British Museum estate. It also provides an overview of the planning history for the Site.

Application Site

3.2 The Site is situated within the Local Planning Authority of London Borough of Camden ("LB Camden" or "the Council") (within Bloomsbury Ward) and contained within the Museum's estate.

3.3 The British Museum estate spans over a total area of approximately 9.2 hectares. The Site which this Application relates to is located within the northeast portion of the Museum's estate and has a site area of 681 sqm. A Site Location Plan is submitted with this Application [ref. 10771-WW-ER-RF-DR-A-1000 Rev P3], which shows the Site in the context of the surrounding area.

Site Location

3.4 The Site is bounded by the rear gardens of the properties in Montague Street (the properties are under the Museum's ownership) to the north, east and south. To the west, the Site is adjacent to East Road, a private road serving the Museum.

3.5 The Site is located within Flood Zone 1, an area which benefits from a low probability of flooding.

3.6 The Site has a Public Transport Accessibility Level (PTAL) of 6b (highest = 6 and lowest = 1) which indicates an 'excellent' level of transport accessibility. Regular bus services are obtained directly outside the Museum at Great Russell Street and Montague Street.

3.7 The Site is in close proximity to the following underground stations:

- Goodge Street (Northern Line) – approximately 7.5 minute walk / 600 metres distance;
- Russell Square Station (Piccadilly Line) – approximately 8 minute walk / 610 metres distance;
- Tottenham Court Road Underground Station (Central Line, Northern Line and Elizabeth Line) – approximately 8 minute walk / 630 metres distance; and
- Holborn Underground Station (Central Line and Piccadilly Line) – approximately 12 minute walk / 930 metres distance.

3.8 The British Museum is a Grade I listed building occupying a street block within the Bloomsbury Conservation Area. The existing East Road Building is located adjacent to listed terraced properties on Montague Street (Grade II) and is considered listed by virtue of attachment to the Grade II listed No. 8 Montague Street.

Planning History

3.9 The British Museum estate has an extensive planning history and the various buildings on site were constructed at different times. The planning history available on the LB Camden's online records dates from 1984.

3.10 The East Road Building dates from the late 20th century. The planning history (on-line) records of relevance to the Site are extensive but we were unable to locate records for the East Road Building or for the Green Huts.

4.0 THE NEEDS CASE

- 4.1 Prior to assessing the component parts of the Proposed Development against the Statutory Development Plan and other material considerations, this Section outlines the needs case for the extensive works to support the Museum's long-term sustainable operation. This Section of the Statement prepared as the needs case is a material consideration to be weighed in the planning balance.
- 4.2 The development of the British Museum estate has been organic and piecemeal, in response to a changing institution that has been transformed since the Museum's founding in 1753. The first national public Museum in the world, the Museum is a world-class institution dedicated to human history, art and culture, with wide-ranging collections that continue to grow and which are studied, presented and shared for the benefit of the people of the world.
- 4.3 The development of the Museum's built fabric is closely linked to the rapid expansion of the collection and the evolving requirements for conservation and public display throughout the 18th, 19th, 20th and 21st centuries. Its history is one of adaption, alteration and remodelling combined with major building projects or construction phases: the 19th century galleries constructed around the pre-existing Montagu House and its subsequent demolition; the construction of the south colonnade and portico; the later 19th century Round Reading Room; the 20th century King Edward VII and Duveen Galleries; the 2000 Great Court; and the 2008-2014 construction of the World Conservation and Exhibitions Centre.
- 4.4 The piecemeal development combined with adaptations made to respond to changes in the collection has resulted in an incoherent estate both operationally and for visitors. The buildings are also in a state of deterioration and in need of investment and modernisation. In summary, the buildings of the estate have responded to changes in use over time, as well as to changing organisation needs, including:
- Growing / record visitor numbers;
 - Changing visitor demographics / expectations / accessibility needs;
 - Emerging / new / innovative display and research practices;
 - Evolving approaches to collection preservation, including environmental controls;
 - A shifting funding environment;
 - An evolving collection, and crucially; and
 - An imperative to address the Climate Crisis through dramatic reductions in carbon emissions.
- 4.5 This presents a significant challenge for the Museum and there is a need for the built fabric to respond to evolving demands. There is now a need for change to resolve the following matters:
- Access and inclusion (creating environmental conditions suitable for all);
 - Building condition (creating environmental conditions that help preserve precious listed fabric);
 - Building energy performance and efficiency to reduce climate impact (eliminate fossil fuels);
 - Air quality impact reduction in context of LB Camden's Air Quality Management Area status;
 - Protection of the collection by creating suitable environmental conditions (heat, cooling and humidity); and
 - Future proofing facilities for anticipated growth in support functions and need for vehicular access.
- 4.6 This Application is the first of a series which presents a significant opportunity to address these problems. The Museum seeks to rationalise and consolidate the Museum's energy infrastructure, engineering network and improve its resilience and efficiency. To achieve this, the Museum proposes:
- The introduction of a new East Road Building to replace the existing one (including switch gear and staff accommodation);
 - The erection of a South West Energy Centre replacing the existing Energy Centre (including staff accommodation); and
 - The upgrade and renewal of the Museum's site-wide primary energy distribution infrastructure.
- 4.7 It is proposed that the East Road Building will be brought forward first (by means of this Application), followed by a separate application for the South West Energy Centre and ancillary changes to the primary distribution infrastructure (submission anticipated for Summer 2023).

- 4.8 The existing East Road Building is considered out-dated and does not meet the requirements of the Museum. Therefore, the Proposed Development seeks the demolition and erection of a new building to support the Museum's operation.
- 4.9 In light of the above, there is a clear need for the redevelopment of the East Road Building in order to meet the long term sustainable objectives of the Museum and deliver modernised plant equipment and high quality support accommodation.

5.0 DEVELOPMENT PROPOSALS

5.1 As set out in **Section 2.0** of this Statement, the Application seeks planning permission and listed building consent for an Engineering Support Hub in place of the existing East Road Building.

5.2 The Scheme would involve:

- Demolition of the existing single storey East Road Building (258 sqm GIA);
- Demolition of two storey structures (referred to as “Green Huts”) (100.26 sqm GIA); and
- Erection of building spanning two storeys (plus a basement level (below ground)) for an Engineering Support Hub (682.4 sqm GIA), which includes;
 - Plant infrastructure (422.8 sqm GIA); and
 - Welfare / support accommodation (259.5 sqm GIA).

5.3 Further details of the Scheme are set out within the Design and Access Statement prepared by Wright & Wright which accompanies this submission.

Demolition of Existing Buildings

5.4 The existing buildings are of poor quality and no longer fit for purpose of supporting the estate-wide energy infrastructure. There is no level access to the ground floor of the East Road Building, and the existing size and configuration would be impractical for the new infrastructure. The ‘Green Huts’ were constructed as temporary accommodation, therefore have a short lifespan. Thus, the existing buildings are not in a good position to be retained or refurbished.

5.5 The existing buildings are considered to be of low heritage and architectural quality that detract from the heritage assets within the Museum’s estate.

5.6 It is proposed to demolish the existing single storey East Road Building and “Green Huts” at the Site as part of the proposed redevelopment. These are situated to the north-eastern corner of the Museum’s estate. All existing buildings equates to a collective floorspace of 358.26 sqm.

Table 5.1 – Existing & Demolished Floorspace Area Schedule.

Existing East Road Building	Support Accommodation – Floorspace (GIA)
Ground Floor	258 sqm
Total	258 sqm

Existing Green Huts	Support Accommodation – Floorspace (GIA)
First Floor	41.96 sqm
Ground Floor	58.3 sqm
Total	100.26 sqm

Proposed Development

5.7 The Proposed Development seeks the erection of a ground plus one storey building with an additional basement level below ground. The new East Road Building will house the Museum’s Carpenters, Locksmiths and Electrical Workshops as well as plant infrastructure supporting the Museum’s fire sprinkler, electrical and life safety systems. The accommodation will be distributed 70% infrastructure and 30% workshops.

5.8 The height of the new building from ground level to the upper floor is 4.275m and from the ground level to the top of the upper floor parapet is 9.56m (34.05m AOD). The basement FFL sits 4.185m below ground floor FFL at 20.505m AOD, which is above the water table at 19.86m AOD.

5.9 In total, the Proposed Development would deliver 682.4 sqm GIA (172.74 sqm NIA) of infrastructure, workspace and support accommodation. An increase of +324.14 sqm (90.5%).

Table 5.2 – Proposed Floorspace Area Schedule.

Proposed East Road Building	Infrastructure – Floorspace (Gia)	Support Accommodation – Floorspace (Gia)
First Floor	28.24 sqm	48.44 sqm
Ground Floor	173.38 sqm	153.6 sqm
Basement	221.21 sqm	157.5 sqm
Total	422.83 sqm	259.54 sqm

Support Accommodation

- 5.10 The support accommodation would include 12 workbenches, 6 lockers, 2 WC's (non-gender specific), and 1 shower.

Materiality

- 5.11 The proposed elevations will be yellow tone London Stock facing brickwork, and at the present time it is envisaged that it would be a combination of Flemish Bond and Soldier Coursing, although this is subject to detailed design. We expect that this can be dealt with by condition. External doors and windows will be charcoal metal framed. The materials have been selected to align with the surrounding area and heritage context.

Access

- 5.12 The principal entrance to the Site is from East Road via step free access due to the slight gradient of 1.21m. Internally, a lift to all levels will provide step free access and be able to accommodate up to 8 persons. The lift will act as an evacuation lift in emergencies. Floor levels can also be accessed via the internal staircase.
- 5.13 The Proposed Development will accord with Approved Document M of the Building Regulations.

Servicing

- 5.14 Refuse and recycling will be provided at ground floor level within the new East Road Building and will be taken to centralised collection points within the Museum's estate. This is as per the current arrangement. Deliveries to the building will also be from existing servicing points from Great Russell Street. The only deliveries directly to the building would be infrequent related to such matters as the delivery of generator fuel, which would take place from Montague Street.

Parking

- 5.15 No additional spaces are proposed and the parking arrangements (incl. blue badge holders, vehicle parking and cycling parking) will be as existing, in line with the Museum's estate-wide strategy.

Drainage

- 5.16 Surface water and foul water will be separated, attenuated internally through the provision of an attenuation tank before joining the combined East Road drainage network.

Green Roof

- 5.17 A green biodiverse roof is proposed at both the upper and lower roof levels, totalling 120 sqm. The provision of a green roof is to aid the reduction of rainwater runoff and improve the Site's biodiversity and urban greening.
- 5.18 The green roof will comprise of biodiverse seed mix topping 100mm of substrate sitting above drainage protection, and waterproofing membrane layers. The seed mix will include low growing and shade tolerant species that can thrive in the Site's microclimate and location.
- 5.19 In line with Government guidance on fire performance of green roofs, the proposed green roof will include 500mm of pebble ballast around the perimeter to act as a fire break.
- 5.20 The proposed green roof would have an Urban Green Factor ("UGF") of 0.12 when measured against the overall planning red line boundary area of 682 sqm, or UGF of 0.22 if measured against the proposed building footprint of 377 sqm.

Ecology

- 5.21 The Proposed Development would include the provision of two bird boxes suitable for house sparrows, and one bat box. The location of the boxes is proposed on the south elevation at the first floor, away from doors and windows.

Lighting

- 5.22 Recessed downlights within the main entrance of the East Road Building are proposed to provide minimal external lighting.

Noise

- 5.23 Two new life safety generators are proposed at roof level, replacing the existing and aged generators currently housed within the North East Boiler House. These will be installed within an external plant enclosure (screen) in keeping with the materiality of the proposed elevations. The generators will be of a canopy type, with attenuation integrated into the generator covers.
- 5.24 The plant noise emission limits are to be controlled to be no more than 10 dBA above the typically measured background noise level, given their infrequent use.

Energy

- 5.25 Materials have been selected to reduce overheating by restricting the provision of glazing. Where windows are proposed, high performance glazing would be used. The thermal performance of the walls will be high to reduce heating demand.
- 5.26 To reduce operational carbon emissions, energy efficient systems including mechanical ventilation with heat recovery (MVHR) units and electric based heating systems will be installed.
- 5.27 Photovoltaic (PV) cells are proposed at roof level to contribute to the Museum's renewable energy aspiration. The PV's will be integrated with the proposed green biodiverse roof.

Pre-Application Discussions and Consultation

- 5.28 The Proposed Development has been developed in consultation with officers at LB Camden, Historic England, and key stakeholders as part of pre-application discussions.
- 5.29 The Proposed Development has evolved through a series of pre-application meetings, including:
- Pre-application meeting with LB Camden held on 8 November 2022;
 - Pre-application meeting with Historic England held on 13 December 2022;
 - Pre-application meeting with LB Camden held on 13 December 2022; and
 - Pre-application meeting with LB Camden and Historic England held on 2 March 2023.
- 5.30 The feedback provided from the officers during the pre-application meetings to date has been positive. The officers were supportive of the principle of the delivery of a new Engineering Support Hub.
- 5.31 The scheme has been developed in line with officer comments received at these meetings with a key theme being to ensure the proposals were designed to the highest architectural quality and responded to the local setting and historic context.
- 5.32 A detailed account of the meetings held with officers and key stakeholders and outcomes achieved is presented within the Design and Access Statement submitted as part of this Application.

6.0 PLANNING POLICY FRAMEWORK

6.1 This Application has been informed by both adopted and emerging Statutory Development Plan policies and other relevant guidance. This section of the Statement provides a summary of the planning context from which such policy is drawn. **Section 7.0** then provides an assessment of the Application against the policies and guidance contained within these documents.

Legislative Context

6.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the Statutory Development Plan unless material consideration indicate otherwise. The relevant Statutory Development Plan for this Site is outlined below.

6.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker 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.

6.4 This Section is applicable as the Site is listed by virtue of attachment to the Grade II listed No. 8 Montague Street.

6.5 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) provides 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.

6.6 This Section is applicable due to the Site being located within the Bloomsbury Conservation Area.

Statutory Development Plan

6.7 The adopted Statutory Development Plan for the Site comprises:

- The London Plan (March 2021); and
- Camden Local Plan (July 2017).

National Planning Guidance

6.8 The National Planning Policy Framework (the "NPPF") was originally published in March 2012, and revised in 2018 and 2019, with the latest revision published July 2021 by the Ministry of Housing, Communities and Local Government. The NPPF sets out the Government's economic, environment and social planning policies for England and supersedes the vast majority of previous Planning Policy Guidance Notes and Planning Policy Statements.

6.9 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through decision-making (Paragraph 11). The NPPF is a material consideration in the determination of planning applications.

6.10 In addition to the NPPF, Planning Practice Guidance ("PPG") was first published in March 2014 and has been amended on numerous occasions to reflect national planning policy changes. The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly should carry weight in the determining of planning applications.

Regional Planning Guidance

6.11 The London Plan (March 2021), prepared by the Greater London Authority, is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the Statutory Development Plan.

- 6.12 The Greater London Authority have published London Plan Guidance (“LPG”) and Supplementary Planning Guidance (“SPG”) which provide further information about how the London Plan should be implemented. Those of relevance include:
- Air Quality Neutral LPG (February 2023);
 - ‘Be Seen’ Energy Monitoring LPG (September 2021);
 - Character and Context SPG (June 2014);
 - Control of Dust and Emissions SPG (July 2014); and
 - Energy Assessment Guidance LPG (June 2022).

Local Planning Guidance

- 6.13 The Camden Local Plan was adopted by LB Camden in July 2017. It replaced the Core Strategy and Camden Development Policies (previously adopted in 2010) as the basis for planning decisions and future development in Camden. The Local Plan ensures that LB Camden have planning policies that respond to the borough’s unique characteristics and contribute to delivering local priorities. The Local Plan covers the period from 2016-2031.
- 6.14 The LB Camden have also published numerous Camden Planning Guidance (“CPG”) which provide advice and information on how policies are to be interpreted and applied. The adopted CPG documents are material considerations in planning decisions. However, they have less weight than the Local Plan or other Development Plan documents. In respect of this Application, the relevant documents include:
- Air Quality (January 2021);
 - Amenity (January 2021);
 - Basements (January 2021);
 - Design (January 2021); and
 - Energy Efficiency and Adaption (January 2021).
- 6.15 In addition to the above, the LB Camden adopted the Bloomsbury Conservation Area Appraisal and Management Strategy in April 2011 which defines the special interest of the Conservation Area in order that its key attributes are understood and can be protected, and that measures are put in place to ensure appropriate enhancement. It replaces the Conservation Area Statement adopted in 1998.
- 6.16 LB Camden have started the Local Plan review process that will cover a three year period from October 2022 to October 2025. An initial public consultation was held between November 2022 and January 2023. The next stage involves the preparation of the Draft Local Plan anticipated for Summer 2023. In light of this and in accordance with Paragraph 48 of the NPPF, the Draft Local Plan can only be afforded very limited weight given that it has not reached an advanced stage of preparation.

Site Specific Designations

- 6.17 The Site is subject to the following designations under the Statutory Development Plan:
- Bloomsbury Conservation Area; and
 - Central London Area.

7.0 PLANNING ASSESSMENT

7.1 Within this section, we assess the component parts of the Proposed Development against the Statutory Development Plan and other material considerations as outlined in **Section 6.0**.

7.2 For the Local Planning Authority to come to a decision, consideration of the proposals against the prevailing Development Plan and determination in accordance with that plan, unless material considerations indicate otherwise, is required. This exercise involves the evaluation of the compliance or otherwise of the Application with policies, by reference to relevant policy and thereafter to identify whether, on balance, the proposals are considered to be appropriate.

Key Planning Considerations

7.3 The key planning considerations assessed include the following:

- Principle of Development;
- Design and Materiality;
- Basements;
- Heritage and Townscape;
- Amenity;
- Noise;
- Air Quality;
- Daylight and Sunlight;
- Servicing and Refuse;
- Energy and Sustainability;
- Biodiversity and Trees;
- Archaeology; and
- Flooding, Drainage and SUDS.

Principle of Development

7.4 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development.

7.5 London Plan Policy HC5 (Supporting London's Culture and Creative Industries) comments that the continued growth and evolution of London's Diverse cultural facilities and creative industries is supported. The policy goes on to state that development proposals should:

- "2) *identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal*"

7.6 Camden Local Plan Policy G1 sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site, providing a mix of uses in accessible parts of the Borough. Local Plan Policy C3 (Cultural and Leisure facilities) supports the expansion of existing facilities and simply states that they expect such proposals to consider their associated impacts.

7.7 The proposals to improve the Museum's essential infrastructure and upgrade staff accommodation are completely in line with the aims of these policies, by underpinning the long-term operational needs of the Museum.

Design and Materiality

7.8 The proposed design and materials have been selected to align with the surrounding area and heritage context. The elevations would be yellow tone London Stock facing brickwork in a combination of Flemish Bond and Soldier Coursing.

External doors and windows will be charcoal metal framed. This is subject to detailed design and review and, can, in our view be dealt with by way of condition.

- 7.9 Section 12 of the NPPF, advocates the development of “*high quality, beautiful and sustainable buildings and places*”. Of which Paragraph 130 sets out the design development will need to consider:
- a. *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b. *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c. *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d. *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e. *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f. *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
- 7.10 Chapter 3 of the adopted London Plan sets out the Mayor’s policies on a number of issues relating to London’s places and spaces and how these can be overcome with good design principles.
- 7.11 Policy D3 (Optimising site capacity through the design-led approach) outlines development proposals should follow a design-led approach which requires consideration of design options to determine the most appropriate form of development that responds to a site’s context to create a safe and inclusive environment.
- 7.12 Policy D4 (Delivering good design) requires a design and access statement to be submitted in order to demonstrate that proposals meet the design requirement of both the London and Local Plans.
- 7.13 Policy D5 (Inclusive Design) states that development proposals should achieve the highest standards of accessible and inclusive design. Proposals should:
- a. *“be designed taking into account London’s diverse population;*
 - b. *provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;*
 - c. *be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;*
 - d. *be able to be entered, used and exited safely, easily and with dignity for all; and*
 - e. *be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.”*
- 7.14 Wright & Wight have prepared a Design and Access Statement that forms part of this Application. This document sets out in detail an evaluation of the Scheme’s design and the manner in which this has progressed as a result of the consultation undertaken. The Design and Access Statement sets out the design strategy and how it responds to the context of the existing building and surrounding area. This document clearly sets out how the proposal complies with Local Plan Policy D1.
- 7.15 We consider each of the limbs of the policy below:
- “The Council will seek to secure high quality design in development. The Council will require that development:*
- a. *respects local context and character.*
- 7.16 The design is purposefully utilitarian in terms of its appearance and materials, utilising a London stock brick to reflect the back-of-house location, which is also in the context of the secondary elevations of the terraces on Montague Street. With respect to its massing, great care has therefore been taken to minimise the impact of the building on the setting of surrounding heritage assets. This has been done by:

- Ensuring that the ground floor retains the same boundary wall height as the present building;
 - That the 1st floor is inset from the northern southern and eastern elevations, to maintain light and outlook to the properties to the east; and
 - That a basement is incorporated, to reduce the above ground mass.
- b. *preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage.*
- 7.17 The proposals remove the temporary and poor quality green huts, and the existing poor quality East Road Building
- c. *is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation; and*
 - d. *is of sustainable and durable construction and adaptable to different activities and land uses.*
- 7.18 The BREEAM Pre-Assessment for the building shows that it will achieve a rating of Excellent, while from an energy perspective it is a low energy building due to the fact large parts of it are unoccupied and do not require heating or cooling. Those parts that are occupied are electrically, heated with good thermal insulation, good air tightness, low energy fixtures and fittings and Photovoltaic Panels on the roof. The building can also be put to use for a range of back-of-house purposes.
- e. *comprises details and materials that are of high quality and complement the local character; and*
 - 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.*
- 7.19 As set out above the materials proposed are of a durable nature reflective of the local character. The exact specification of brick to ensure a good tone, texture and quality can be dealt with via a condition.
- 7.20 The proposed location reflects that of the current building and does not alter the relationship with surrounding streets or spaces. Furthermore, the limited extent of the site does not afford the opportunity to alter that relationship.
- g. *is inclusive and accessible for all; and*
 - h. *promotes health.*
- 7.21 The building's ground floor level is lowered from that of the present building to afford level access to all. Externally a small section of the Eastern Road is regraded to provide a shallow ramp up to the entrance. From a health perspective, the internal environment will be of a good quality in terms of light, ventilation and fixtures and fittings, improving the wellbeing of employees.
- i. *is secure and designed to minimise crime and antisocial behaviour.*
- 7.22 The building is located within the secure perimeter of the Museum, and the present CCTV. It also benefits from its own security provisions and lighting to the external entrance.
- j. *responds to natural features and preserves gardens and other open space.*
- 7.23 The only natural features to respond to are the trees within adjoining gardens, which have been fully assessed and taken account of to ensure that they are preserved. These are discussed separately in the arboriculture section of this report.
- 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; and*
 - l. *incorporates outdoor amenity space.*
- 7.24 The scheme incorporates landscaping through the provision of a green roof. Other areas of the Application site are operational service routes of the Museum. Given the constrained nature of the site it is considered that the opportunity for landscaping has been maximised and that amenity space is not possible within the constraints of the site.
- m. *preserves strategic and local views; and*
 - n. *for housing, provides a high standard of accommodation.*

- 7.25 These two points are not relevant to the proposals.
- o. carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available.”*
- 7.26 The building services equipment is located within the building and forms part of its overall architectural composition, such that it is not a discernible feature of the proposals.
- 7.27 Section 4 of the Design and Access Statement clearly and methodically sets out the extent of demolition, design principles, relationship to adjoining properties as well as the form and materiality.
- 7.28 It can be seen from this document that the proposed building is a stylish, accessible, sustainable, and well considered addition to the Museum Estate by meeting their needs in considered and contextual way.

Basements

- 7.29 Camden Local Policy A5 (Basements) sets out the following requirements for proposed basement developments:

“The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a. neighbouring properties;*
- b. the structural, ground, or water conditions of the area;*
- c. the character and amenity of the area;*
- d. the architectural character of the building; and*
- e. the significance of heritage assets.*

In determining proposals for basements and other underground development, the Council will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- a. not comprise of more than one storey;*
- b. not be built under an existing basement;*
- c. not exceed 50% of each garden within the property;*
- d. be less than 1.5 times the footprint of the host building in area;*
- e. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;*
- f. not extend into or underneath the garden further than 50% of the depth of the garden;*
- g. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and*
- h. avoid the loss of garden space or trees of townscape or amenity value.*

Exceptions to f. to k. above may be made on large comprehensively planned sites.

The Council will require applicants to demonstrate that proposals for basements:

- a. do not harm neighbouring properties, including requiring the provision of Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale ‘very slight’;*
- b. avoid adversely affecting drainage and run-off or causing other damage to the water environment;*
- c. avoid cumulative impacts;*
- d. do not harm the amenity of neighbours;*
- e. provide satisfactory landscaping, including adequate soil depth;*

- f. do not harm the appearance or setting of the property or the established character of the surrounding area;
- g. protect important archaeological remains; and
- h. do not prejudice the ability of the garden to support trees where they are part of the character of the area.”

7.30 A Basement Impact Assessment has been prepared by Alan Baxter Associates in accordance with Camden’s Supplementary Planning guidance on basements. That exercise, together with other supporting documents address points a-g of the third part of the policy, namely:

- a. That ground movement would be within acceptable limits (negligible to very slight);
- b. Drainage runoff will be attenuated, and that ground water can flow around the basement as it is not restricted by neighbouring properties;
- c. There are no other basement developments that need to be taken account of;
- d. There would be no harm to residential amenity;
- e. The proposals incorporate satisfactory landscaping into the building’s design;
- f. There will be no evidence of the basement from above ground and therefore preserves the character of the surrounding area;
- g. An archaeological evaluation will be carried out as part of the development; and
- h. A comprehensive review of trees in proximity to the basement has been undertaken to ensure that they are protected from the construction of the development.

7.31 It should also be noted that the basement does not comprise more than one storey, is not built under an existing basement, does not occupy garden land and is not greater than the footprint of the host building. It therefore complies with parts a) – h) of the second part of the policy.

7.32 We therefore conclude that the proposal would not cause harm to neighbouring properties designated heritage assets or the amenity of the area and is therefore compliant with policy A5.

Heritage and Townscape

7.33 The British Museum is a Grade I listed building occupying a street block within the Bloomsbury Conservation Area. The existing East Road Building is located adjacent to listed terraced properties on Montague Street (Grade II) and is considered listed by virtue of attachment to the Grade II listed No. 8 Montague Street.

7.34 With respect to this Application, the applicable statutory provisions are:

- Section 66(1) the determination of applications; and
- Section 72(1) with regard to conservation areas.

7.35 Section 66 (general duty as respects listed buildings in exercise of planning functions) of the 1990 Act, requires that when determining applications, 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.*”

7.36 Having regard to the above, the statutory provision is satisfied if development proposals preserve a listed building and/or the setting of a listed building. The meaning of preservation in this context is taken to be the avoidance of harm.

7.37 Section 72 (General duty as respects conservation areas in exercise of planning functions) of the 1990 Act requires that, in the exercise of all planning functions, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the area. The statutory provision is satisfied if development proposals preserve or enhance the character or appearance of a conservation area. Character relates to physical characteristics but also to more general qualities such as uses or activity within an area. Appearance relates to the visible qualities of the area.

7.38 Improvements to setting, enhancing the significance of an asset or our ability to appreciate that, attract great weight in the planning decision making process under the terms of Paragraph 193 of the NPPF.

7.39 Paragraph 194 of the NPPF states that:

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate

to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."

7.40 Policy HC1 (Heritage conservation and growth) of the adopted London Plan states development proposals should have regard for surrounding heritage assets and archaeological assets. In both instances, their significance should be conserved. Proposals should avoid harm and identify enhancement opportunities.

7.41 LBC Local Plan Policy D2 (Heritage) outlines that LBC will preserve and, where appropriate, enhance the 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.

7.42 A Heritage Statement has been prepared by Montagu Evans and concludes:

"The proposals have developed with regard to the constraints of the site and careful consideration of the heritage sensitivities of both the historic Museum fabric and the listed buildings to the east on Montague Street. In respect of the former, the rationalisation of the existing energy infrastructure and the implementation of new sustainable infrastructure is achieved without harm to heritage interests for the reasons set out above. The proposed ERB will not affect the way the intrinsic interest of the historic galleries, their function, or the display of objects, but will deliver future benefit (in future phases) through supporting improved infrastructure for the Museum supporting the display, conservation and management of the collections.

In respect of the listed buildings to Montague Street and the CA, the demolition of the existing ERB will not harm significance and the new-build proposals will not materially affect the way the listed buildings within this part of the Bloomsbury CA are experienced and appreciated. The visual envelope of the site is limited, and there will be no effect on CA views or the principal elevations of the terrace properties. To the rear, the existing service area which has a utilitarian character will be rationalised and improved."

7.43 Overall, the Proposed Development would be acceptable as it accords with the relevant policies on design and heritage, avoiding harm to the significance of the affected listed buildings and the Conservation Area. The decision taker, therefore, is able to discharge the statutory duties of the Planning (Listed Buildings and Conservation Area) Act 1990 and national and local planning policy.

Amenity

7.44 The NPPF states that development should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

7.45 Local Plan Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity. To support this policy, LBC has produced extensive guidance within its Amenity CPG.

7.46 Careful consideration has been given to the amenities of the surrounding buildings all of which are in commercial use. The form and massing of the proposed extensions have been carefully designed to cause minimal impact to both sunlight and daylight reaching neighbouring properties, as well as the potential impact from pollution.

7.47 Camden's CPG on Amenity (January 2021) requires development to be designed to protect the privacy of occupiers of both existing and proposed dwellings.

7.48 The parapet height of the ground floor matches that of the present building. The relationship does not change in that regard. The first floor is set back to ensure that it does not interrupt the 45 degree line from the ground floor windows of the neighbouring properties on Montague Street. It also does not project across the full width of the building.

7.49 The impact on the outlook and light of the properties is therefore minimised. The Daylight and Sunlight Impacts Assessment prepared by Gordon Ingram Associates confirms that there will be no perceptible loss of light to neighbouring properties and is fully compliant with the BRE Guidelines. It should also be noted that there are no windows of any habitable accommodation of neighbouring buildings facing the development site.

7.50 A Lighting Assessment has been prepared by Steensen Varming and is submitted with this Application. The report includes lighting layout, luminaires and compliance with ILP Guidance notes.

7.51 Reviewing the proposals against planning policy, it is considered that the Scheme would not cause detrimental harm to surrounding properties, which are all in commercial use, with respect to light, outlook and privacy.

Noise

7.52 Policy D14 (Noise) of the adopted London Plan states that noise should be managed and mitigated in order to improve health and wellbeing. The management of noise is about encouraging the right acoustic environment, both internal and external, in the right place at the right time.

7.53 LBC Policy A4 (Noise and vibration) requires all noise to be controlled and managed and should have regard to Camden's Noise and Vibration Thresholds.

7.54 An Environmental Noise Impact Assessment has been prepared by Encon, which sets noise limits for emergency and non-emergency plant. The noise limits are set to ensure that all operational plant is 10dBa below background noise levels, in line with Policy A14. Policy A14 sets a lower criteria for back-up plant (given the limited frequency and duration of operation), which ensures that it operates no higher than 10dBa above background noise levels. All plant will be specified in due course to comply with these noise criteria and therefore complies with the relevant policies.

Air Quality

7.55 The NPPF, at Paragraph 181 sets out that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified.

7.56 Policy SI 1 (Improving air quality) of the adopted London Plan outlines development proposals should not:

- a. *“lead to further deterioration of existing poor air quality;*
- b. *create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; and*
- c. *create unacceptable risk of high levels of exposure to poor air quality”.*

7.57 LBC Local Plan Policy CC4 (Air Quality) requires the impact of development on air quality to be mitigated and ensure that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.

7.58 An Air Quality Assessment has been prepared by Encon. The report follows the Camden Air Quality Planning Guidance. The report outlines that the risks from dust soiling during demolition construction and track out are low and can be adequately dealt with through mitigation measures. With respect to the emergency generator the report concludes:

“Taking into account the elevated position of the emission flues providing good dispersion, the very intermittent and short-term nature of operation and the separation distance to the nearest sensitive receptors (over 60 m to nearest residential receptors) impacts associated with the generators are considered to be not significant, based on professional judgement.”

7.59 The proposals are therefore considered to meet the terms of adopted policies CC4 by mitigating the effects of the development where appropriate.

Daylight and Sunlight

7.60 London Plan Policy H6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

- 7.61 Local Plan Policy A1 is supported by the Camden CPG on Amenity (January 2021) which provides further guidance on the expectations that LBC has when considering the impact of schemes on daylight and sunlight levels. It notes that levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.
- 7.62 As noted above the properties surrounding the site are all in commercial use. A Daylight and Sunlight Impacts Assessment has been prepared by Gordon Ingram Associates which assesses the impact of the Proposed Development on surrounding properties. The assessment has been undertaken in accordance with the Building Research Establishment (“BRE”), “Site Layout Planning for Daylight and Sunlight”.
- 7.63 This confirms that there are no material impacts arising from the proposed development with respect to daylight and sunlight either to adjoining buildings or adjoining amenity spaces.
- 7.64 Overall, the scheme is therefore considered to be acceptable with regard to daylight and sunlight considerations and is fully compliant with the BRE guidance. It therefore meets with the aims of Policies A1 and H6 referred to above.

Servicing and Refuse

- 7.65 Local Plan Policy CC5 (Waste) seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of waste recycled / composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 7.66 London Plan Policy T7 (Deliveries, servicing and construction) states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 7.67 The Design and Access Statement prepared by Wright and Wright includes a section on Delivery, Waste and Servicing Strategy. Presently a waste store is located on the northern elevation of the ERB building. This is to be relocated further north alongside the eastern boundary wall in the former position of the Green Huts. This will be sized adequately for the needs of the ERB building and provide for both waste and recycling. Waste and recycling will be transferred from ERB building, to this new store and then to a central waste collection point. Operationally this is the same as the existing approach.
- 7.68 Any deliveries associated with the ERB will be consolidated with the Museum’s existing servicing arrangements. No changes are proposed. As per the existing back up generators, fuel deliveries will continue to be from Montague Place entrance.
- 7.69 The proposals therefore do not give rise to any additional impacts with respect to Deliveries and Servicing and are considered to meet with the aims of adopted policy.

Energy and Sustainability

- 7.70 The NPPF supports the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourages the reuse of existing resources, including conversion of existing buildings, and encourages the use of renewable resources.
- 7.71 The London Plan sets out a number of core policies for major developments with regard to reducing carbon dioxide emissions and providing energy in a sustainable manner. Policy S12 (Minimising greenhouse gas emissions) sets out a minimum on-site reduction of at least 35 per cent beyond Building Regulations 152 is required for major development.
- 7.72 At the local level, Camden Local Plan Policy CC1 (Climate Change Mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation. Policy CC2 (Adapting to Climate Change) supports development that provides appropriate climate change adaption measures including SUDs, green infrastructure and measures to reduce overheating.

- 7.73 Camden's CPG on Energy Efficiency and Adaptation (January 2021) requires all development to reduce carbon dioxide emissions by following the energy hierarchy. For non-residential development a 15% reduction (beyond part L Building regulations) is required. In addition, all non-residential development of 500 sqm or more floorspace to be BREEAM 'Excellent'.
- 7.74 An Energy and Sustainability Statement has been prepared by Steensen Varming together with a BREEAM Pre-Assessment prepared by Eight Versa. The latter concludes that the building should be able to achieve a BREEAM 'Excellent' Rating.
- 7.75 With respect to energy efficiency the report notes that the property is exempt from Part L of the building regulations because the building is mainly un-occupied by virtue of its use for plant. Notwithstanding this the occupied areas are to benefit from:
- High levels of insulation and air tightness, to reduce heat gains and losses;
 - High performance glazing for solar control;
 - Mechanical Ventilation with Heat Recovery;
 - Energy Efficient Lights;
 - All electric heating / services; and
 - Roof Mounted Photo Voltaic Panels.
- 7.76 The proposals therefore provide a highly energy efficient and sustainable building which meets the objectives of adopted Local Plan Policies CC1, CC2 and London Plan Policy SI2.

Biodiversity and Trees

- 7.77 Policy G1 (Green Infrastructure) of the London Plan outlines proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. This can be achieved through Policy G5 (Urban Greening) of the London Plan which outlines suitable measures include landscaping, green roofs, green walls and sustainable drainage solutions.
- 7.78 Camden Policy A3 (Biodiversity) outlines the Council will protect and enhance sites of nature conservation and biodiversity. Camden will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.
- 7.79 With regard to trees, Camden will:
- a. *“resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation;*
 - b. *require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 ‘Trees in relation to Design, Demolition and Construction’ and positively integrated as part of the site layout;*
 - c. *expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development;*
and
 - d. *expect developments to incorporate additional trees and vegetation wherever possible.”*
- 7.80 A Tree Survey and Tree Constraints Plan has been provided by Writtle Forest, which confirms that there are three trees and one group, which are in proximity to the development.
- 7.81 The Application is also accompanied by an Arboricultural Implications Assessment and Arboricultural Method Statement prepared by Writtle Forest. These reports conclude that, subject to appropriate measures, it would be possible to retain all of the trees on the site during the course of the construction. The report recommends the reduction of the Crown of T21 (A prunus sp) and the crowns of G2 (Elder x2, Cherry, Sorbus). No works are required to T16 (a London Plane). No works are required to T22 (Horse Chestnut), despite the development being in the Root Protection Area. This is because the tree is coming to end of its life and its roots will already have significantly retrenched. The report notes it only has approximately 10 years left and is being retained for its wildlife value.

- 7.82 The Arboricultural Method Statement provides a detailed methodology setting out how the development works will be carried out in proximity to the trees to ensure they are not adversely impacted.
- 7.83 The limited and constrained nature of the site prevents the provision of new trees, although as noted elsewhere in this statement, a green roof is incorporated within the proposals.
- 7.84 Subject to an appropriately worded condition to ensure that the trees are protected in accordance with the measures set out, we consider the proposals comply with the requirements of Local Plan Policy A3 with respect to trees.
- 7.85 A Preliminary Ecological Appraisal has also been carried out by Writtle Forest. This concluded that there were no protected species on the development site. The report recommended a further bat survey to be conducted as a precaution prior to commencement and to be secured via a planning condition.
- 7.86 Assuming, as expected that the results of this survey are negative, we see no impediment to development on the site.
- 7.87 The report also recommends enhancements through the incorporation of bat and bird boxes, to provide new habitats, which can be secured through an appropriately worded condition. The types envisaged are set out in the Design And Access Statement.
- 7.88 The building also incorporates a 120 sqm green roof which will further encourage and enhance bio-diversity on the site. While the Urban Greening Factor target of 0.3 for commercial buildings does not apply to minor proposals or developments of this nature, the proposals provide a score of 0.12 on what is a challenging site.
- 7.89 The proposals therefore comply with the adopted policies of the development plan referred to above.

Archaeology

- 7.90 The site is located within the Tier II London Suburbs Archaeological Priority Area.
- 7.91 Camden Policy D2 (Heritage) Archaeology outlines the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.
- 7.92 To accord with Policy D2, the Application is supported by an Archaeological Desk-Based Assessment prepared by Pre-Construct which shows that the archaeological survival potential of the site is expected to be low to moderate potential for prehistoric material, a low potential for Roman material, a low potential for Saxon material, a low potential for medieval evidence, a high potential for post-medieval material and a high potential for modern material.
- 7.93 Pre-Construct conclude that based upon the archaeological potential for the prehistoric and post-medieval remains, it is expected that further archaeological work will be necessary to confirm the presence or absence of archaeology and allow the design of an appropriate mitigation strategy to offset the anticipated medium adverse impact from the proposed development. This requirement can be secured via a planning condition and as such the proposal would accord with Policy Local Plan Policy D2.

Flooding, Drainage and SUDS

- 7.94 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Chapter 14 of the National Planning Policy Framework recommends that SUDS should be utilised, where possible, within all new drainage schemes.
- 7.95 At a local level, Camden Local Plan Policy CC2 advises that all development should adopt appropriate climate change adaptation measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- 7.96 Camden Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.

- 7.97 Camden Planning Guidance 'Water and Flooding' (2019) states that the Council expects all developments, whether new or existing buildings, to be designed to be water efficient by minimising water use and maximising the re-use of water.
- 7.98 The Site is located in Flood Risk Zone 1, an area assessed as having a 1 in 1000 or less annual probability of river or sea flooding (< 0.1%).
- 7.99 A Drainage Strategy Statement has been prepared by Alan Baxter and submitted as part of this Application. For surface water, the proposal for sustainable drainage systems, proposed green roof and below ground attenuation tanks would ensure that surface water run-off rates do not increase over the existing conditions.
- 7.100 The foul water drainage from the building will utilise the existing combined drainage network. Therefore, there will be negligible impact on the overall flow discharging from the Museum estate.
- 7.101 In summary the proposals do not increase the impermeable area on the site and nor do they increase the risk of flooding either on site or elsewhere, rather they reduce the risk of flooding by attenuating the surface water drainage on site, to as close to green field runoff rates as possible. It is therefore considered that the development is at low risk of flooding from all sources and meets the requirements of Local Plan Policy CC3.

8.0 THE PLANNING BALANCE

- 8.1 This section of the Statement provides a planning balance assessment as required under adopted and emerging planning policies and section 38(6) of the 2004 Act.
- 8.2 The Statement provides a detailed assessment of the proposals for the redevelopment of the Site in relation to national, strategic and local planning policy and other material considerations. It is our position that the proposed Scheme is consistent with the statutory development plan when read as a whole.
- 8.3 The building is the first to assist the Museum on its journey towards significantly reducing its energy demands, by accommodating appropriate infrastructure, to enable the transition from gas to an all electric system. It would provide infrastructure to update its back up and life safety systems (emergency generators, sprinklers tanks etc). These matters in themselves are, in our view, weighty considerations, which meet with the overarching objectives of the development plan.
- 8.4 With respect to the building itself, it would deliver a number of benefits. These are summarised below.
- 8.5 The proposed new building would be of a high architectural quality and of an inclusive design, in accordance with London Plan Policies D4 and D5 as well as Local Plan Policies D1 and D2.
- 8.6 The proposal incorporates enhancements to bio-diversity and urban greening as encouraged by London Plan Policies G1 and G5 and Local Plan policy A3.
- 8.7 The proposed building would be highly sustainable with the preassessment indicating it achieves a BREEAM Rating of 'Excellent'. The building would also be an energy efficient design, by adopting the hierarchy in London Plan Policy SI2 in its approach to its design. It is therefore in accordance with Local Plan Policies CC1 and CC2 as well as London Plan policy SI2.
- 8.8 The building would incorporate new permanent fit for purpose back-of-house accommodation for staff, which provides for the removal of the temporary structures (green huts), which are of a poor quality in terms of their appearance and fitness for purpose. The proposals would therefore meet with the objectives of Local Plan Policies G1 and C3 with respect to the replacement accommodation.
- 8.9 With respect to the design, the proposals have developed with the constraints imposed by the listed buildings and conservation area in mind including careful consideration of the heritage sensitivities of both the historic Museum fabric and the listed buildings to the east on Montague Street.
- 8.10 In respect of the former, the rationalisation of the existing energy infrastructure and the implementation of new sustainable infrastructure is achieved without harm to heritage interests for the reasons set out in the Heritage Statement. The proposed ERB will not affect the way the intrinsic interest of the historic galleries, their function, or the display of objects, but will deliver additional future benefit (in future phases) through supporting improved infrastructure for the Museum supporting the display, conservation and management of the collections.
- 8.11 In respect of the listed buildings to Montague Street and the CA, the demolition of the existing ERB will not harm significance and the new-build proposals will not materially affect the way the listed buildings within this part of the Bloomsbury CA are experienced and appreciated. The visual envelope of the site is limited, and there will be no effect on CA views or the principal elevations of the terrace properties. To the rear, the existing service area which has a utilitarian character will be rationalised and improved.
- 8.12 For these reasons we conclude that the proposed development satisfies the statutory tests (S16(2), S66(1) and 72(1)) and the requirements of national and local policy, with respect to heritage matters.
- 8.13 Therefore, it is clear that the proposal is fully in accordance with Statutory Provisions, the adopted development plan and other material considerations such that the scheme should be granted planning permission and listed building consent.

9.0 CONCLUSION

9.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the consideration and determination of applications for planning permission and listed building consent on behalf of The British Museum to the London Borough of Camden in regard to the proposed Engineering Support Hub at East Road Building, The British Museum, Great Russell Street, London WC1B 3DG.

9.2 The Application seeks planning permission and listed building consent for the following description of development:

“Demolition of existing building and two storey structures on East Road (to the rear of 9-11 Montague Street and 43 Russell Square) and erection of new two storey building, plus basement and associated works to provide plant and welfare accommodation ancillary to the Museum”.

9.3 The Proposed Development includes the following:

- Demolition of the existing single storey East Road Building (258 sqm GIA);
- Demolition of two storey structures (referred to as “Green Huts”) (100.26 sqm GIA); and
- Erection of building spanning two storeys plus a basement level (below ground) for Engineering Support Hub (682.4 sqm GIA), which includes:
 - Plant infrastructure (422.8 sqm GIA); and
 - Welfare / support accommodation (259.5 sqm (GIA)).

9.4 The Scheme has been formulated in accordance with the NPPF, the adopted London Plan and policies set out within the Local Plan.

9.5 The proposals present a high quality Scheme which has been developed in consultation with Officers at LB Camden and Historic England during pre-application discussions.

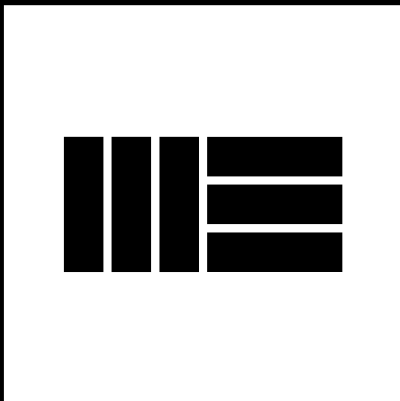
9.6 The Statement has assessed the proposal against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.

9.7 Having regard to the assessment undertaken within this Statement, the planning benefits arising from the Proposed Development can be summarised as follows:

- A new building of a high architectural quality;
- Enhancements to bio-diversity;
- Sustainable design;
- New permanent back-of-house accommodation for staff; and
- Removal of poor quality temporary buildings.

9.8 In conclusion, the Proposed Development is considered to be in accordance with the relevant national planning policy guidance and development plan policies when assessing the Development Plan as a whole. We therefore respectfully consider that the proposals are appropriate and planning permission and listed building consent should be granted.

MONTAGU EVANS
70 ST MARY AXE
LONDON
EC3A 8BE



WWW.MONTAGU-EVANS.CO.UK

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL