

PLANNING STATEMENT

THE ENERGY CENTRE PROGRAMME

THE BRITISH MUSEUM, GREAT RUSSELL
STREET, LONDON WC1B 3DG

ON BEHALF OF THE TRUSTEES OF THE BRITISH MUSEUM

OCTOBER 2023

PD13794: CM/GF/GA/EM



CONTENTS

| | | |
|-----|---------------------------------|----|
| 1.0 | INTRODUCTION | 3 |
| 2.0 | SITE AND SURROUNDING AREA | 6 |
| 3.0 | THE NEEDS CASE..... | 8 |
| 4.0 | DEVELOPMENT PROPOSALS | 10 |
| 5.0 | PLANNING POLICY FRAMEWORK | 13 |
| 6.0 | PLANNING ASSESSMENT..... | 16 |
| 7.0 | THE PLANNING BALANCE..... | 29 |
| 8.0 | CONCLUSION | 30 |

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Montagu Evans LLP for full planning permission and listed building consent ("the / this Application") for a new energy centre and infrastructure support services ancillary for the operation of a museum (Use Class F1(c), formerly Use Class D1) ("the Proposal" / "Proposed Development" / "Scheme") at The British Museum, Great Russell Street, London WC1B 3DG ("the Site").

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

1.4 The Application forms part of the Museum's principal energy transition programme (referred to as the "Energy Centre Programme") for its Bloomsbury Estate ("the Museum Estate" / "the Estate") and is designed to address matters of energy efficiency, sustainability, and staff welfare accommodation.

1.5 This Application would assist the Museum's aspiration to transition to low-carbon sustainable systems, replacing critical life-safety infrastructure, and providing appropriate facilities for the maintenance and upkeep of the Museum. The works would likewise support the future upgrade of M&E and distribution and services to each of the galleries and collections storage.

1.6 The British Museum Estate comprises a collection of Grade I listed buildings within the Bloomsbury Conservation Area. The Estate spans over a total area of approximately 9.2 hectares.

1.7 The proposed energy centre and incoming substation are contained within the Museum Estate and consists of the following buildings:

| Existing Buildings | Proposed Buildings |
|---|----------------------------------|
| South West Boiler House ("SWBH") | South West Energy Centre ("SWE") |
| South West Portacabins ("SW Portacabins") | |
| South East Portacabins ("SE Portacabins") | Incoming Substation ("ISS") |

1.8 The existing buildings to which the majority of the proposed works relate serve as back-of-house functions that are not accessible to the public.

1.9 The existing SWBH building is a three storey brick building with a lower ground floor, used as an energy centre. The existing site dates from 1997 and requires upgrading as it has gone beyond its design life.

1.10 The existing SW & SE Portacabins were built postwar for temporary support accommodation for the Museum but are of poor quality and detract from the surrounding listed buildings.

1.11 The existing SWBH building, and SW Portacabins are to be demolished and replaced with the SWE building (five storeys) which would act as the new energy centre. The SE Portacabins would also be demolished to accommodate the new ISS building. The proposed buildings would be of high architectural quality and energy efficient achieving BREEAM "Excellent".

1.12 In order to meet the demands of upgrading the electrical infrastructure the high voltage ("HV") distribution would need to be replaced and for the new heating system proposed the low temperature hot water ("LTHW") pipework would also need to be replaced.

1.13 The Application Site presents a number of planning, design and heritage considerations which have been carefully considered in the context of the Proposed Development and in close consultation with officers from the LB Camden and Historic England.

OVERVIEW OF SCHEME

1.14 The Proposed Development includes the following works:

- A new energy centre in the south western corner of the Estate ("South West Energy Centre" / "SWEC");
- A new incoming switch room in the south eastern corner of the Estate ("Incoming Substation" / "ISS");
- Infrastructure distribution which connects the new plant systems to secondary plant rooms / systems across the Estate; and
- Temporary and / or permanent enabling works required to other existing buildings / structures around the Estate to enable the development proposals to be constructed including various works to adjacent listed buildings and structures.

1.15 The floorspace generated by the Proposed Development is 1,984.13 sqm (GIA).

PURPOSE AND FORMAT OF PLANNING STATEMENT

1.16 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.

1.17 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.

1.18 The Statement brings together the findings of the technical reports identified in **Table 1.1** 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 1.1 – Document Schedule prepared by Montagu Evans

| Doc No. | Document Title | Author |
|---------|---|--------------------------|
| 1. | Document Schedule (i.e., this Schedule) | Montagu Evans |
| 2. | Completed Application Form (with Ownership Certificates) | Montagu Evans |
| 3. | Covering Letter | Montagu Evans |
| 4. | Location Plan (1:1250) | Wright & Wright |
| 5. | Site Plan (1:500) | Wright & Wright |
| 6. | Drawing Issue Sheets | Wright & Wright |
| 7. | Application Drawings (incl. plans, elevations, sections, and demolition) | Wright & Wright |
| 8. | Design and Access Statement (incl. Verified Views & Landscape Strategy) | Wright & Wright |
| 9. | Community Infrastructure Levy Form | Montagu Evans |
| 10. | Planning Statement | Montagu Evans |
| 11. | Heritage Statement | Montagu Evans |
| 12. | Demolition Schedule of Works | Wright & Wright |
| 13. | Structural Statement | Alan Baxter |
| 14. | Preliminary BREEAM Assessment | Eight Versa |
| 15. | Energy and Sustainability Statement | Steensen Varming |
| 16. | Environmental Noise Impact Assessment | Encon |
| 17. | Daylight, Sunlight and Overshadowing Assessment | Gordon Ingram Associates |
| 18. | Air Quality Assessment | Encon |
| 19. | Archaeological Desk-Based Assessment | Pre-Construct |
| 20. | Preliminary Ecological Appraisal | Writtle Forest |
| 21. | a) Arboricultural Method Statement b) Arboricultural Implication Assessment c) Tree Survey d) Tree Constraints Plan e) Tree Protection Plan | Writtle Forest |
| 22. | Lighting Assessment | Steensen Varming |
| 23. | Construction Management Plan | Real PM |
| 24. | Transport Assessment (incl. Framework Travel Plan) | Momentum |
| 25. | Sustainable Drainage Systems Strategy | Alan Baxter |
| 26. | Fire Statement | Arup |
| 27. | Statement of Community Involvement | Concilio |

1.19 The structure of this Statement is as follows:

- **Section 2.0** provides background and planning history of the Site and its surrounding context;
- **Section 3.0** outlines the Museum's need and justification for the Proposed Development;
- **Section 4.0** sets out the details of the Proposed Development;
- **Section 5.0** summarises the legislation and planning policy framework relevant to the Site;
- **Section 6.0** undertakes an assessment of proposals against planning policy;
- **Section 7.0** outlines the planning benefits of the Scheme; and
- **Section 8.0** provides a balanced conclusion, recommending planning approval as summarised below.

CONCLUSION

1.20 This Planning Statement demonstrates that the Proposed Development would deliver the following benefits:

- Transition to a carbon neutral position for the Museum;
- Two new buildings of high architectural quality;
- Removal of poor quality temporary accommodation
- Improve the appearance and setting of the listed buildings and conservation area;
- Design centred on sustainability and energy efficiency;
- Increased biodiversity with proposed landscaping; and
- Safeguarding the Museum's long-term operation and future.

1.21 In respect of each heritage asset considered, significance is preserved in line with the three statutory provisions cited in Section 2 of the Heritage Statement. In respect of the Museum itself, a major benefit is identified from the delivery of the infrastructure required to support the Museum's operational requirements and the necessary maintenance of its fabric, and the betterment of its estate, including areas visible from the public realm. The enhancement of elements of its setting likewise comprises enhancements to the character and appearance of the Bloomsbury Conservation Area. In relation to all other assets potentially affected by the proposals – listed buildings in the surrounding streets, the listed entrance gates, railings and lodges to the Museum and the Bedford Square RPG, we find that significance, and the contribution made by setting to significance, is preserved.

1.22 For these reasons and as set out within this report, we conclude that the proposed development satisfies the statutory tests (S16(2), S66(1) and 72(1)) and the requirements of the cognate national and development plan policy as identified in this report.

1.23 The Proposed Development provides the opportunity for the whole of the British Museum site to realise Museum's carbon neutral objectives, which goes beyond the proposed development itself and therefore the requirements of national, regional and local planning policy, including other material considerations such as emerging policy and guidance. The scheme would therefore provide an opportunity to deliver significant planning and heritage benefits over and above the existing situation in future applications.

1.24 We therefore respectfully consider that the proposals are appropriate and planning permission and listed building consent should be granted.

2.0 SITE AND SURROUNDING AREA

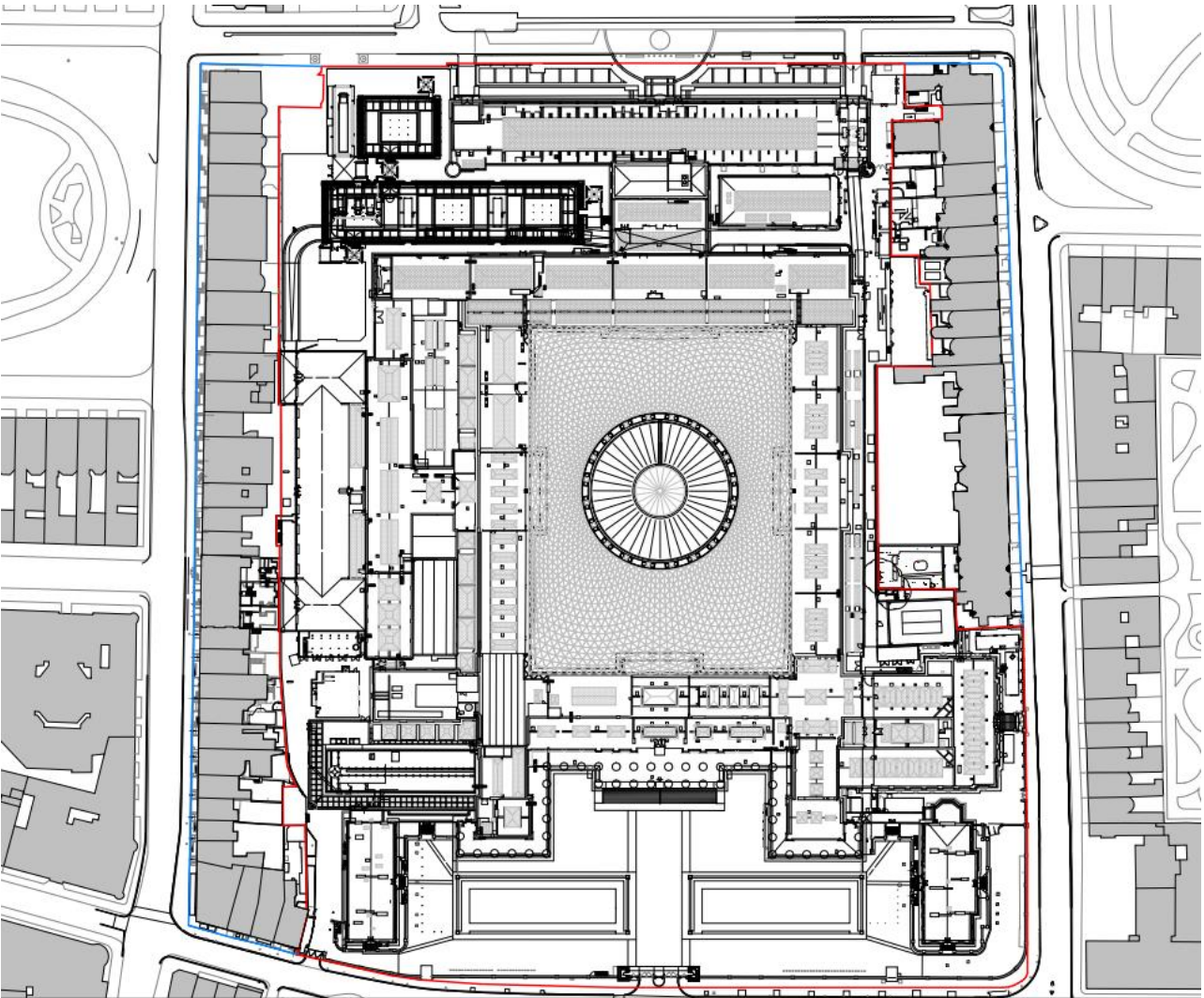
- 2.1 The following section provides an overview of the Site, describing the existing buildings in the context of the surrounding area, including the British Museum Estate. It also provides an overview of the planning history for the Site.
- 2.2 The British Museum Estate spans over a total area of approximately 9.2 hectares. The Estate comprises a collection of Grade I listed buildings within the Bloomsbury Conservation Area.
- 2.3 The Museum’s Estate is situated within the Local Planning Authority of LB Camden (within Bloomsbury Ward).

SITE

- 2.4 The Site relates to the red line boundary in **Figure 2.1** below.
- 2.5 The proposals are located at the south eastern and south western corners of the Museum’s Estate.
- 2.6 The Site consists of the following buildings:

| Existing Buildings | Proposed Buildings |
|---|----------------------------------|
| South West Boiler House (“SWBH”) | South West Energy Centre (“SWE”) |
| South West Portacabins (“SW Portacabins”) | |
| South East Portacabins (“SE Portacabins”) | Incoming Substation (“ISS”) |

Figure 2.1 – Site Plan prepared by Wright & Wright.



- 2.7 The Site has an existing floor area of 761.45 sqm (SWBH and SW & SE Portacabins) and serves as back-of-house functions that are not accessible to the public.

- 2.8 The Site is accessed from Great Russell Street (The South-East Gate) and from Montague Place (The North-East Gate). There is an internal perimeter road (West Road) that links these entrances to form a main service road for the entire Estate.
- 2.9 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.
- 2.10 The Application Site is located within Flood Zone 1, an area which benefits from a low probability of flooding.

SWEC SITE

- 2.11 The proposed SWEC Site consists of the existing SWBH building and the SW Portacabins.
- 2.12 The existing SWBH building is a three-storey brick building with a lower ground floor, used as an energy centre and infrastructure support accommodation. The existing site dates from 1997 and is located within the south west corner of the Museum Estate and adjoins the southern range of the Duveen Gallery.
- 2.13 The Duveen Gallery is a Grade I listed building, as a result, the existing SWBH is Grade I listed by virtue of its attachment to the Duveen Gallery. However, the SWBH building itself does not materially contribute to the significance (architectural or historic special interest) of the Duveen Gallery listing.
- 2.14 To the east are the museum galleries collectively known as the Western Range (Grade I listed) and to the west are the rear gardens of terraced properties on Bloomsbury Street (Grade II Listed).
- 2.15 To the south of the SWBH is a three storey block of portacabins, referred to as the SW Portacabins, currently used to provide welfare facilities for contractors. The SW portacabins are of temporary nature, over 25 years old, and occupy the space between the existing SWBH, the New Wing and the Lycian Gallery (both Grade I listed).
- 2.16 The use of this area is for infrastructure and servicing functions, given the presence of the servicing perimeter road, the constrained location and lack of visibility from public areas.

ISS SITE

- 2.17 The proposed ISS Site would replace the existing SE Portacabins, located in the south east corner of the Museum's Estate.
- 2.18 There is an existing Incoming Substation located to the north east corner of the Estate which would be decommissioned in light of the new ISS Site.
- 2.19 The existing SE Portacabins consists of three independent portacabins (one storey in height) of temporary nature and poor quality. The SE Portacabins are located in the forecourt of the White Wing (Grade I listed) and by boundary the railings (Grade II*) which form the Estate's boundary. The forecourt surface treatment is made up of tarmac and gravel.
- 2.20 The SE Portacabins are visible from Montague Street by members of the public and detracts from the surrounding listed buildings and conservation area.

PLANNING HISTORY

- 2.21 The British Museum Estate has an extensive planning history and the various buildings on site were constructed at different times. The planning history on the LB Camden's online records dates from 1984, however there were no relevant applications in relation to the SWEC and ISS Sites available online.

3.0 THE NEEDS CASE

- 3.1 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 Energy Centre Programme to support the Museum's long-term sustainable operation. This application follows on from the Planning and Listed Building Consent applications for the East Road Building which also form part of the Museum's overarching objectives to replace and upgrade the Museum's energy systems and underpin its journey to becoming Carbon Neutral. This Section of the Statement prepared as the needs case is a material consideration to be weighed in the planning balance.
- 3.2 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.
- 3.3 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.
- 3.4 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.
- 3.5 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.
- 3.6 These challenges are also opportunities for significant planning benefits.

THE ENERGY CENTRE PROGRAMME

- 3.7 This Application forms part of the Museum's Energy Centre Programme, a package of proposals that seek to rationalise and consolidate the Museum's energy infrastructure, engineering network and improve its resilience and efficiency.
- 3.8 To achieve this, the Energy Centre Programme consist of the following submissions:

Submission 1 (May 2023)

- A new East Road Building to replace the existing building for infrastructure equipment and welfare accommodation.

- 3.9 An application (2023/1848/P and 2023/2020/L) has been submitted to LB Camden for the “*erection of new two storey building, plus basement and associated works to provide plant and welfare accommodation ancillary to the Museum following demolition of existing building and two storey structures on East Road (to the rear of 9-11 Montague Street and 43 Russell Square)*”. The application is pending determination.

Submission 2 – This Application (October 2023)

- A new South West Energy Centre replacing the existing energy centre;
- A new incoming switch room to replace the existing portacabins;
- The upgrade and renewal of the Museum’s site-wide primary energy distribution infrastructure; and
- Temporary and / or permanent enabling works required to existing buildings / structures.

- 3.10 The above proposals relate to this Application which seek planning permission and listed building consent.

Future Submissions (2024)

- Demolition of the North East Boiler House; and
- Demolition of the existing Incoming Substation in the north-east of the Estate.

- 3.11 The existing energy infrastructure 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 energy buildings and upgrading the distribution network to support the Museum’s operation. In light of the above, there is a clear need for the redevelopment in order to meet the long term sustainability objectives of the Museum.

4.0 DEVELOPMENT PROPOSALS

4.1 As set out in **Section 1.0** of this Statement, the Application seeks planning permission and listed building consent for a new South West Energy Centre, Incoming Substation, upgrading the distribution network and enabling works.

4.2 The Proposed Development would involve the following:

- The demolition of the existing SWBH and SW portacabin block and their replacement with a new, carefully considered energy centre including staff welfare accommodation (“South West Energy Centre” / “SWEC”);
- The removal of the existing SE portacabins adjacent to the White Wing and their replacement with a new incoming switch room in the south (“Incoming Substation” / “ISS”);
- Infrastructure distribution which connects the new plant systems to secondary plant rooms / systems across the Estate; and
- Temporary and / or permanent enabling works required to other existing buildings / structures around the Estate to enable the development proposals to be constructed.

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

4.4 The area schedule below summarises the changes in floor area in relation to the SWEC Site and ISS Site.

Table 4.1 – Area Schedule

| Buildings | Existing sqm (GIA) | Demolished sqm (GIA) | Proposed sqm (GIA) |
|---------------------------|--------------------|----------------------|--------------------|
| SWEC Site: SWBH | 233.93 sqm | 233.93 sqm | 1,939.65 sqm |
| SWEC Site: SW Portacabins | 420.52 sqm | 420.52 sqm | |
| ISS Site: SE Portacabins | 107 sqm | 107 sqm | 44.48 sqm |
| Total | 761.45 sqm | 761.45 sqm | 1,984.13 sqm |

SWEC PROPOSALS

4.5 The proposed SWEC building is a five-storey building (G+4) for plant infrastructure and maintenance support accommodation, serving the whole Estate, incorporating the following:

- A low carbon primary heating & cooling system;
- A primary electrical system to power it and replace critical life-safety infrastructure; and
- Maintenance support accommodation to ensure the new infrastructure and wider Estate & collections are efficiently operated and maintained.

4.6 The proposed SWEC building will replace the existing SWEC building and infill the block between the Duveen Gallery and the New Wing. Plant equipment is proposed at roof level in a plant enclosure. Together these proposals help to unlock the Museum’s de-carbonisation journey.

4.7 Excluding the plant enclosure, the SWEC Site creates a total gross internal floor area (GIA) of 1,940 sqm. From the ground to the top of the plant enclosure the SWEC Site has a height of 24.25 metres (48.40m AOD).

4.8 Plant on the Lycian building is to be replaced with two new air source heat pumps.

ISS PROPOSALS

4.9 The proposed ISS is a single storey building to be in the south-east corner of the Estate and will be visible at street level to members of the public on Montague Street. The ISS Site will accommodate high voltage (“HV”) switch rooms, of which one will be controlled by UKPN and the other the Museum, to deliver electrical power.

4.10 In this location temporary cabins are removed, together with later railings and a ‘tunnel’ which partially protrudes above ground. The area immediately surrounding the ISS building will be landscaped as part of these proposals.

DISTRIBUTION NETWORK PROPOSALS

- 4.11 In order to meet the demands of upgrading the electrical infrastructure the HV distribution will need to be replaced and for the new heating system proposed the low temperature hot water ("LTHW") pipework will also need to be replaced.
- 4.12 The approach is to re-use wherever possible external service routes for new HV. In below-ground external distribution areas, new cables will typically be laid within ducts within the perimeter road and will not affect the built historic environment or fabric.
- 4.13 New external LTHW pipework will run either buried under the road as above or exposed at high level, using existing service routes. Where possible, the pipework will run in existing trenches retained at their current size, although there are some areas where an increase in trench size will be required to receive new pipework, and areas too where new trenching will be required to accommodate the new service routes. This work is covered in detail in the Design and Access Statement and the distribution drawings.

ENABLING WORKS

- 4.14 To support the delivery of the Energy Centre Programme a series of smaller enabling works are required on either a temporary or permanent basis which include:
- The careful dismantling, storage and re-erection in situ of the Grade II* listed southwest gate piers and railings to enable construction traffic access;
 - The careful dismantling, storage and re-erection in situ of the Grade II* listed southeast railings to facilitate access to the ISS to enable its connection to UKPN;
 - The removal of a section of walling to the west lawn within the entrance forecourt to allow for temporary security arrangements for the period of construction; and
 - Works to facilitate the erection of a crane within the entrance forecourt, comprising excavation and works to stabilise the temporary structure.
- 4.15 For avoidance of doubt, these enabling works are required to facilitate the continuity of existing business-as-usual operations, logistics, and infrastructure during the construction period. Or required to facilitate the construction of the proposed new buildings where these sit directly adjacent to existing business-as-usual operational functions, and access points or existing plant infrastructure and distribution which needs to remain live. They do not comprise any form of enabling development in planning terms.

PRE-APPLICATION DISCUSSIONS

- 4.16 The Proposed Development has been developed in consultation with officers at LB Camden, Historic England, and key stakeholders as part of pre-application discussions.
- 4.17 The Proposed Development has evolved through a series of pre-application meetings, including:
1. Pre-application meeting with LB Camden on 8 November 2022;
 2. Pre-application meeting with Historic England on 13 December 2022;
 3. Pre-application meeting with LB Camden on 13 December 2022;
 4. Pre-application meeting with LB Camden and Historic England on 2 March 2023;
 5. Pre-application meeting with LB Camden on 19 June 2023;
 6. Pre-application meeting with LB Camden on 13 September 2023;
 7. Pre-application meeting with LB Camden on 21 September 2023; and
 8. Pre-application meeting with LB Camden on 12 October 2023.
- 4.18 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 Proposed Development.
- 4.19 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.

- 4.20 A detailed account of the meetings held with officers and outcomes achieved is presented within the Design and Access Statement submitted as part of this Application.

PUBLIC CONSULTATION

- 4.21 Concilio, appointed on behalf of the Applicant, managed a programme of community engagement regarding this Application which ran from August 2023 to September 2023. The programme included the following:
- Engagement with locally elected representatives;
 - Engagement with interested community stakeholders (including The Georgian Group and the Victorian Society);
 - Direct liaison with residents and businesses (180 consulted on); and
 - In-person exhibitions (held on 14 September 2023 and 16 September 2023 and attended by 326 people).
- 4.22 In addition, a communication channel (freephone number and e-mail address) was created for general questions and comments.
- 4.23 The feedback received from the public consultation was supportive, with a key theme that the proposals should protect the museum's future while moving to net zero and being environmentally sustainable.
- 4.24 Full details of the public consultation undertaken can be found in the Statement of Community Involvement prepared by Concilio and for amendments to the proposal / design as a result of the feedback received is contained in the Design and Access Statement prepared by Wright & Wright.

5.0 PLANNING POLICY FRAMEWORK

- 5.1 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 6.0** then provides an assessment of the Application against the policies and guidance contained within these documents.

LEGISLATIVE CONTEXT

- 5.2 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 the Site is outlined below.
- 5.3 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.
- 5.4 This section is applicable as the SWEC Site is listed by virtue of attachment to the Grade I listed Duveen Gallery and includes the following surrounding listed buildings:
- The British Museum (Grade I listed) – including the galleries (Duveen Gallery) and wings; and
 - Nos. 24-60 Bloomsbury Street (Grade II listed) – including the attached railings;

- 5.5 For full details on the surrounding heritage assets, including listed buildings, please refer to the enclosed Heritage Statement prepared by Montagu Evans.
- 5.6 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.
- 5.7 This section is applicable due to the Site being located within the Bloomsbury Conservation Area.

STATUTORY DEVELOPMENT PLAN

- 5.8 The adopted Statutory Development Plan for the Site comprises:
- The London Plan (March 2021); and
 - Camden Local Plan (July 2017).

NATIONAL PLANNING GUIDANCE

- 5.9 The National Planning Policy Framework (the “NPPF”) was originally published in March 2012, and revised in 2018, 2019 and 2021, with the latest revision published September 2023 by the Department for Levelling Up, Housing and Communities. 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.
- 5.10 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 11 states that decisions should apply a presumption in favour of sustainable development and goes on to state that:

“For decision-taking this means:

*c) approving development proposals that accord with an up-to-date development plan without delay; or
d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

5.11 The NPPF is a material consideration in the determination of planning applications.

5.12 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

5.13 The London Plan (March 2021), prepared by the Greater London Authority (“GLA”), 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.

5.14 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);
- Energy Assessment Guidance LPG (June 2022); and
- Optimising Site Capacity: A Design-led Approach (June 2023).

5.15 The Mayor of London introduced the Good Growth by Design programme (2022) to shape a better city by promoting quality and inclusion in the built environment. Good Growth forms the guiding principle for the London Plan.

5.16 The Good Growth by Design programme is underpinned by the following six pillars:

1. Setting standards and informing delivery - Using design inquiries to investigate key issues for architecture, urban design and place-shaping, in order to set clear policies and standards;
2. Ensuring quality - Ensuring effective design review across London, including a London Design Review Panel;
3. Building capacity - Enhancing the GLA Group’s and boroughs’ ability to shape new development to deliver good growth;
4. Supporting diversity - Working towards a more representative sector and striving for best practice while designing for diversity;
5. Commissioning quality - Ensuring excellence in how the Mayor and other public sector clients appoint and manage architects and other built environment professionals; and
6. Championing and learning - Advocating best practice to support success across the sector.

LOCAL PLANNING GUIDANCE

5.17 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.

5.18 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);
- Design (January 2021);
- Energy Efficiency and Adaption (January 2021); and
- Water and Flooding (March 2019) .

5.19 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.

5.20 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 consultation late in 2023. Considering 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

5.21 The Site is subject to the following designations under the Statutory Development Plan:

- Bloomsbury Conservation Area;
- Central London Area; and
- Tier II London Suburbs Archaeological Priority Area.

6.0 PLANNING ASSESSMENT

- 6.1 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 5.0**.
- 6.2 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

- 6.3 The key planning considerations assessed include the following:

- Principle of Development;
- Design and Materiality;
- Heritage and Townscape;
- Noise;
- Air Quality;
- Daylight and Sunlight;
- External Lighting;
- Energy and Sustainability;
- Biodiversity and Trees;
- Archaeology;
- Flooding and SuDS;
- Servicing and Refuse;
- Transport;
- Construction Management; and
- Fire Safety.

PRINCIPLE OF DEVELOPMENT

- 6.4 The Proposed Development relates to a museum land use (Use Class F1(c)).
- 6.5 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 Development Plan should be approved. For the reasons set out within this chapter, the Proposed Development, is considered to either meet or exceed the requirements of the relevant strands of development plan policy and represents sustainable development.
- 6.6 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.*
- 6.7 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.
- 6.8 Camden 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.

- 6.9 The proposals would assist the Museum's aspiration to transition to low-carbon sustainable systems, replacing critical life-safety infrastructure, and providing appropriate facilities for the maintenance and upkeep of the Museum. The works would likewise support the future upgrade of M&E and distribution and services to each of the galleries and collections storage
- 6.10 Overall, the proposals would improve the British Museum's existing infrastructure, creating a sustainable future for the operation of a museum. The principle of the development therefore accords with the policies identified and is therefore acceptable

DESIGN AND MATERIALITY

- 6.11 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.*
- 6.12 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.
- 6.13 London Plan Policy D1 (London's Form, Character and Capacity for Growth) requires developments to respond to the local context by delivering buildings and spaces that are positioned and are of a scale, appearance and shape that responds successfully to the identity and character of the locality.
- 6.14 London Plan 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.
- 6.15 London 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.
- 6.16 London 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.*
- 6.17 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 pre-application and public 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 Camden Local Plan Policy D1 (Design) which reads as follows:

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; and*
- 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; 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.*
- g. is inclusive and accessible for all; and*
- 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; and*
- l. incorporates outdoor amenity space.*
- m. preserves strategic and local views; and*
- n. for housing, provides a high standard of accommodation.*
- o. carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available.*

- 6.18 The Proposed Development accords with national, regional and local policy through the provision of a scheme which is of the highest architectural quality and responds to its setting through carefully considered design and the sensitive use of materials.
- 6.19 The existing SWBH which dates from 1997 and SW Portacabins are utilitarian and expedient in character, having a negative impact on the setting of neighbouring buildings. The replacement of poor quality existing accommodation with high quality design would improve the overall visual and environmental quality of the south western part of the Estate.
- 6.20 The proposed SWEC Site would accommodate a new contemporary piece of architecture aligned to current and long term needs of the museum. In terms of both character and scale, the proposals are consistent with the existing character of the setting.
- 6.21 The proposed SWEC building will deliver critical upgrades required to enable a sustainable infrastructure transition across the Estate, as well as replace aged life-safety infrastructure serving the wider Museum.
- 6.22 The existing SE Portacabins is a temporary structure of poor quality, which are not suitable for long term use. Consequently, the portacabins are detrimental to the setting of neighbouring listed buildings, in particular the White Wing (Grade I listed). The landscaping under the portacabins is generally loose gravel north of the White Wing's external stair, and tarmac to the South of the White Wing's external stair.
- 6.23 The massing of the ISS Site has sought to be subservient to the White Wing and its location positioned to allow increased visibility of the White Wing from the Montague Street. The materiality is influenced to match the existing portico which terminates the Georgian terrace of 1 / 1A Montague Street and screened from the street by the existing cast iron railings.
- 6.24 Overall, the ISS design proposals present an enhancement to the setting relative to the existing condition, which is dominated by the unsightly existing portacabins.
- 6.25 The design of the proposals is therefore considered to accord with the development plan policies identified above, as well as the relevant sections of national guidance.
- 6.26 The following section will consider the proposal in light of the townscape and surrounding heritage designations, further demonstrating that in line with the adopted Development Plan for the Site, the Proposed Development is of a scale, appearance and shape that responds successfully to the identity and character of the locality.

HERITAGE AND TOWNSCAPE

- 6.27 The British Museum is a Grade I listed building occupying a street block within the Bloomsbury Conservation Area. There are numerous listed buildings and structures in the immediate vicinity, including those within the street block and owned by the Museum.
- 6.28 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.
- 6.29 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.*”
- 6.30 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.
- 6.31 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.
- 6.32 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.
- 6.33 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.*
- 6.34 London Plan Policy HC1 (Heritage Conservation and Growth) states that 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.
- 6.35 Camden Local Plan Policy D2 (Heritage) outlines that LB Camden 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.
- 6.36 A Heritage Statement has been prepared by Montagu Evans and states that the proposals have carefully considered the heritage sensitivities of both the historic Museum’s fabric and the surrounding townscape.
- 6.37 The status and extent of the listing is discussed in the Heritage Statement. The principle of demolition is deemed acceptable given the existing energy centre (SWBH) and SW & SE portacabins are of no historic interest or architectural merit in themselves and make no more than a neutral contribution to the significance of the Museum ranges or listed terraces to the west. A Schedule of Works has been prepared by Wright & Wright which describes where it is proposed to remove any part of an existing building including ceilings, partitions, fixtures and fittings. It is noted here that the boundary railings are of themselves listed, their removal and storage, is required to enable construction, following which they will be reinstated. This element is also considered acceptable in principle subject to conditions controlling the manner of their removal and reinstatement.
- 6.38 The proposed SWEC building, while increasing in massing, has been designed to optimise the space available and is achieved without harming the intrinsic interest of the historic galleries, their function, or the display of objects. The proposal

would deliver a future benefit through supporting improved environmental conditioning for the display, conservation and management of the collections.

- 6.39 The new SWEC would not affect any principal public view of the Museum from Great Russell Street or the South Forecourt. This is supported by a series of verified views presented in the Design and Access Statement.
- 6.40 The proposed ISS building would materially enhance the immediate setting of the White Wing through the removal of the temporary SE portacabins that are publicly visible. The design ensures it is subservient and its materiality responds to the existing portico that terminates the 1 / 1A Montague Street frontage.
- 6.41 The Statement states that the overall setting of the surrounding listed buildings is improved and that no identifiable harm arising from the ISS in its operational state, either to the Museum Estate, surrounding listed buildings or the character and appearance of the conservation area.
- 6.42 The proposals to the distribution network have been carefully considered to avoid or minimise impact on historic fabric.
- 6.43 The enabling works to facilitate the construction of SWEC and ISS are required to other existing buildings / structures around the Estate, some of which affect listed fabric on either a temporary or permanent basis. The delivery of the proposals is a significant undertaking in the context of an operational museum, and critical to the approach is minimising the impact on the collections and / or the ability for the collections to be appreciated by the public.
- 6.44 As a result, the proposals and sustainable infrastructure is described overall as a major benefit for the Museum in heritage terms.
- 6.45 Therefore, the Proposed Development would be acceptable as it accords with the relevant development plan and NPPF 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.

NOISE

- 6.46 London Plan Policy D14 (Noise) 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.
- 6.47 LB Camden Local Plan Policy A4 (Noise and Vibration) requires all noise to be controlled and managed and should have regard to Camden's Noise and Vibration Thresholds. The policy states that development should have regard to LB Camden's Noise and Vibration Thresholds (referred to as Appendix 3).
- 6.48 LB Camden will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity, and the development should seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.
- 6.49 An Environmental Noise Impact Assessment has been prepared by Encon based on a 24 hour noise survey that was carried out on 19-20 April 2023 to establish the prevailing acoustic climate for the Proposed Development and to determine the plant noise limits from the proposed non-emergency plant.
- 6.50 The noise limits are set to ensure that all operational plant is 10dBa below background noise levels, in line with Policy A4. Policy A4 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.
- 6.51 The survey measurements were taken at one location to represent background sound levels at the most-exposed noise sensitive receptor, 40 Bloomsbury (hotel located to the west of the proposed SWEC building).
- 6.52 The initial environmental noise impact assessment predicts that noise emissions from non-emergency plant will exceed the stipulated plant noise emission limits at the closest noise sensitive receptor.

- 6.53 The incorporation of mitigation measures, notably acoustic enclosures and acoustic louvre screening into the design the noise emissions from non-emergency plant will be in line with the requirements of Local Plan and London Plan Policy, and the British Standard 4142: 2014 + A1:2019 'Methods for rating and assessing industrial and commercial sound.

AIR QUALITY

- 6.54 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.
- 6.55 London Plan Policy SI1 (Improving Air Quality) 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.*
- 6.56 Camden 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.
- 6.57 LB Camden has declared the whole borough an Air Quality Management Area.
- 6.58 An Air Quality Assessment has been prepared by Encon, where proposals have been assessed against the London Plan Air Quality Neutral guidance.
- 6.59 The assessment considered the impacts from the demolition and construction phases and concluded there would be a low risk with regards to dust soiling during these phases. The Site is considered to have a negligible risk with regard to PM₁₀ concentrations during all aspects of the construction phase. However, following the implementation of appropriate mitigation measures impacts associated with the construction of the development are likely to be insignificant.
- 6.60 For pollution levels, the assessment determines that impacts of exposure would be negligible. For the life-saving diesel generators the risk of significant effects on local air quality would be low.
- 6.61 The development has been assessed against Policy SI1 of the London Plan and has been found to be air quality neutral in respect of both building and transport emissions.
- 6.62 The Proposed Development would meet current national, regional and local planning policy identified and based on the results of this assessment air quality does not pose a constraint to development of the Site for the proposed use.

DAYLIGHT AND SUNLIGHT

- 6.63 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.
- 6.64 Camden 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.
- 6.65 To support this policy, LB Camden has produced extensive guidance within its Amenity CPG (January 2021) which sets out Camden's expectations when considering the impact of schemes (usually of residential nature) 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. A daylight and sunlight assessment is required for residential schemes or major applications.
- 6.66 The properties surrounding the Site are all in commercial use, of note are the two hotels at 36-38 Bloomsbury Street and 40 Bloomsbury Street.

- 6.67 As this Proposed Development forms a major application, a Daylight, Sunlight and Overshadowing Assessment has been prepared by Gordon Ingram Associates which assesses the impact of the proposals on surrounding properties, in particular the two hotels. The assessment has been undertaken in accordance with the Building Research Establishment guidelines (BR209, 2022).
- 6.68 The assessment identifies that the implementation of the Proposed Development would cause the hotels to experience changes in daylight outside of the BRE recommendations. However, a hotel bedroom, by nature is a space used for sleeping and as such would not have a direct impact as there are no occupiers that would notice the change in light.
- 6.69 All adjoining property gardens would also achieve BRE compliance for overshadowing.
- 6.70 The assessment concludes that the results are reasonable in this urban location.
- 6.71 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.
- 6.72 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 the Local Plan and London Plan Policies referred to above.

EXTERNAL LIGHTING

- 6.73 Camden Local Plan Policy A1 (Managing the Impact of Development) requires proposals to consider the impact of artificial lighting levels on occupiers and neighbours. Artificial lighting should only illuminate the intended area and not affect or impact on the amenity of neighbours.
- 6.74 A Lighting Assessment has been prepared by Steenson Varming and is submitted with this Application. This assessment includes details on the luminaires, lighting layout, light level and night time light pollution.
- 6.75 The proposed SWEC building would include external lighting to provide illumination for staff and for maintenance / servicing work. The lighting would enable people to enter, use and exit the Site safely.
- 6.76 The proposed lighting includes the following:
- Wall mounted luminaires on the western façade to facilitate access to transformer rooms and generator plant;
 - Surface mounted downlights in the external corridor which separates the northern and southern parts of the SWEC building at ground floor level, and outside the (covered) entrance to the South Stair at the rear of the building; and
 - Wall lights (with minimal upward beam to reduce spill light to the sky) to facilitate access to the mechanical plant at roof level.
- 6.77 All wall mounted luminaires are to be controlled via an astronomical time clock and / or a daylight sensor to switch on at sunset and automatically switching off at 23.00.
- 6.78 The proposed lighting design fully complies with the recommendations of the Institute of Lighting Professionals Guidance Notes for the Reduction of Obstructive Light GN01:2020
- 6.79 The external lighting design also incorporates the requirements of ILP Guidance note GN08: 2018 Bats and artificial lighting in the UK as per Writtle Forest's Preliminary Ecological Appraisal (December 2022), namely:
- Using LED luminaires to minimise UV light emission;
 - Adopting a warm white spectrum; and
 - Using luminaires which feature a peak wavelength higher than 550 nm (2700K-3000K).
- 6.80 The proposed lighting has been designed against the relevant planning policy and guidance and is deemed acceptable for this development.

ENERGY AND SUSTAINABILITY

- 6.81 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.
- 6.82 London Plan Policy SI2 (Minimising Greenhouse Gas Emissions) outlines that major developments should be net zero-carbon, which means reducing carbon dioxide emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
1. *Be lean: use less energy and manage demand during operation;*
 2. *Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly;*
 3. *Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and*
 4. *be seen: monitor, verify and report on energy performance.*
- 6.83 Under Policy SI2, a minimum on-site reduction of at least 35% beyond Building Regulations for major development. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures.
- 6.84 Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either: through a cash in lieu contribution to the borough's carbon offset fund; or off-site provided that an alternative proposal is identified and delivery is certain. Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions.
- 6.85 London Plan Policy SI3 (Energy Infrastructure) explains that development in Heat Network Priority Areas should have a communal low-temperature heating system by following the heating hierarchy:
1. *Connect to local existing or planned heat networks;*
 2. *Use zero-emission or local secondary heat sources (in conjunction with heat pump, if required);*
 3. *Use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network); and*
 4. *Use ultra-low NOx gas boilers.*
- 6.86 Where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.
- 6.87 London Plan Policy SI4 (Managing Heat Risk) outlines that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- 6.88 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.
- 6.89 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'.
- 6.90 An Energy and Sustainability Statement has been prepared by Steensen Varming together with a BREEAM Pre-Assessment prepared by Eight Versa. The former statement focuses on the SWEC building as the ISS building does not include environmental conditioning.
- 6.91 The SWEC building includes passive design measures to improve its sustainable performance. Active energy efficient systems have also been integrated into the design this include but are not limited to:

- Air to water source heat pumps (ASHPs);
- Water to water source heat pumps (WSHPs); and
- Mechanical ventilation with heat recovery (MVHR).

- 6.92 The BREEAM Pre-Assessment indicates that the SWEC building should be able to achieve a BREEAM 'Excellent' rating, with a target score of 75.2%.
- 6.93 The SWEC building would create a combined carbon emissions reduction over the baseline of 22.2%. While the London Plan's target is 35%, it is considered this is an aspirational target, with best endeavours to be used to maximise the savings possible.
- 6.94 The SWEC development follows the London Plan energy hierarchy and will be providing a cash offset payment to Camden borough's carbon offset fund. The cash in-lieu contribution is estimated to be £20,753.
- 6.95 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.

TREES

- 6.96 London Plan Policy G7 (Trees and Woodland) requires development proposals to wherever possible, existing trees of value are retained and that the planting of additional trees should be generally included in new developments.
- 6.97 Camden Local Plan Policy A3 (Biodiversity – Trees) ensure that the Council will protect and seek to secure additional trees and vegetation, this includes:
- *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;*
 - *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;*
 - *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*
 - *Expect developments to incorporate additional trees and vegetation wherever possible.*
- 6.98 An Arboricultural Implication Assessment has been prepared by Writtle Forest which assesses the SWEC Site and ISS Site. The assessment is accompanied by a Tree Survey and Tree Constraints Plan.
- 6.99 The assessment identifies there are 21 trees located near the proposed SWEC Site and 14 trees located near the ISS Site. No trees are to be removed as part of these proposals. As a result, the Proposed Development would not significantly impact the local tree landscape.
- 6.100 For the SWEC Site, where below ground investigations are proposed it is recommended that arboricultural supervision is undertaken to protect the tree roots. The above ground mitigation it is recommended trees have minor crowning lifting. T8 (London Plane) would require more significant reduction of the crown for the construction phase, in particularly for the crane operations.
- 6.101 For the ISS Site, no below ground mitigation works are required, but for the above ground, mitigation should include minor pruning to allow for the proposed works to proceed.
- 6.102 The assessment recommends that the protective barriers are to be installed and are to remain in-situ throughout the construction phase. Therefore, the controls in place will preserve the trees and comply with policy.
- 6.103 The Arboricultural Method Statement prepared by Writtle Forest 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.

- 6.104 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 the London Plan and Local Plan Policy with respect to trees.

ECOLOGY AND BIODIVERSITY

- 6.105 London Plan Policy G1 (Green Infrastructure) seeks development proposals to incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
- 6.106 London Plan Policy G6 (Biodiversity and Access to Nature) supports development proposals that manage impacts on biodiversity and aim to secure net biodiversity gain. Proposals which reduce deficiencies in access to nature should be considered positively.
- 6.107 Camden Local Plan Policy A3 (Biodiversity) outlines the Council will protect and enhance sites of nature conservation and biodiversity. LB 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.
- 6.108 The proposed ISS Site to be relandscaped (approximately 290 sqm) to provide Museum staff with external amenity for mental health and wellbeing and improve the appreciation of the White Wing and Montagu Street. Full details of the landscaping strategy are to be secured by a condition.
- 6.109 In terms of ecology, a Preliminary Ecological Appraisal has also been carried out by Writtle Forest, which includes a survey conducted on 30 November 2022 and identified nesting birds and bats may be inhabiting the Site.
- 6.110 The report recommended an inspection to ensure no birds were located within the fire escape area, and a further re-inspection prior to the commencement of works to ensure there is no nesting. Works involving demolition where birds are found to be nesting should be undertaken outside of the breeding season (March to September inclusive). If not possible, an experienced ecologist would be required to remove the nesting birds.
- 6.111 The erection of three bird boxes, of which two for House Sparrows and one for Robins / Wagtails, integrated into the façade and located away from windows and doors is encouraged. If mitigation methods and recommendations are followed, the Proposed Development would have minimal impact to nesting birds.
- 6.112 The report stated that no further survey is required for bats to be carried out prior to the commencement of works to ascertain if the areas are utilised for temporary roost or resting.
- 6.113 Any external lighting proposed designed in accordance with the guidance set out in the Institute for Lighting Professionals' (ILP) note on bats and artificial lighting. Following the application of sensitive lighting design, the Proposed Development would have negligible impact on bats.
- 6.114 At least one bat box should be integrated into the new build development and located within a south facing façade, close to vegetation, and away from windows or doors.
- 6.115 The improvements to landscaping and the inclusion of new habitats would improve the overall biodiversity of the Site. Therefore, the proposals comply with the NPPF and adopted policies of the Development Plan referred to above.

ARCHAEOLOGY

- 6.116 The Site is located within the Tier II London Suburbs Archaeological Priority Area.
- 6.117 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.
- 6.118 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.

- 6.119 The new SWEC and ISS buildings would have no basements.
- 6.120 Pre-Construct conducted a recent archaeological watching brief on geotechnical trial pits around the Museum (including the footprint of SWEC and ISS) and did not find evidence for the civil war ditch or Montague House.
- 6.121 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 the relevant policies of the NPPF, London Plan and Local Plan Policy.

FLOODING, DRAINAGE AND SUDS

- 6.122 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%).
- 6.123 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.
- 6.124 At a local level, Camden's Local Plan Policy CC2 (Adapting to Climate Change) advises that all development should adopt appropriate climate change adaption measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- 6.125 Camden Local Plan Policy CC3 (Water and Flooding) seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.
- 6.126 Camden Planning Guidance 'Water and Flooding' (March 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.
- 6.127 A Drainage Strategy Statement has been prepared by Alan Baxter and submitted as part of this Application. The report identifies that the location of the proposed SWEC and ISS buildings are hard landscaped or occupied by buildings, therefore rainwater currently drains into the Museum's combined surface and foul below-ground drainage network.
- 6.128 The proposals for SWEC seek to maintain the existing foul water strategy via the existing main combined sewer.
- 6.129 The surface water strategy will involve the introduction of Sustainable Drainage Systems ("SuDS") which can include the following:
- Surface water storage;
 - Infiltration into the ground via soakaways;
 - Infiltration into the ground via permeable paving;
 - Attenuate surface water in open water features;
 - Green roofs and attenuation using blue roofs; and
 - Attenuate in below-ground attenuation tanks or pipes.
- 6.130 The proposal for SuDS would ensure that surface water run-off rates do not increase over the existing conditions. The outflow from the attenuation tank will be throttled to 2 l/s, and discharged via the existing combined sewer connected to the Great Russell Street public sewer.
- 6.131 The proposed ISS building would connect to the existing below-ground drainage run linked to the Montague Street public sewer, to discharge surface water and foul water. Therefore, there will be negligible impact on the overall flow discharging from the Museum estate.

- 6.132 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 the NPPF, London Plan and Local Plan.

SERVICING AND REFUSE

- 6.133 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.
- 6.134 Camden 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.
- 6.135 The proposals would not alter the Estate wide servicing and operational strategy using the existing entrance gates and internal servicing road. As per the existing back up generators, fuel deliveries will continue to be from Montague Place entrance.
- 6.136 The Museum's Estate wide refuse and recycling strategy also remains in place.
- 6.137 As the Proposed Development presents a rationalisation there would be no additional servicing or refuse required, therefore, the proposals do not give rise to any additional impacts and are considered to meet the aims of the NPPF and adopted Development Plan.

TRANSPORT

- 6.138 Section 9 of the NPPF promotes sustainable transport and requires applications under Paragraph 112 to:
- a. give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
 - b. address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
 - c. create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
 - d. allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
 - e. be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*
- 6.139 Policy T1 (Strategic Approach to Transport) and Policy T2 (Healthy Streets) of the adopted London Plan supports sustainable transport options including public transport, walking and cycling in order to promote healthy streets. In order for the promotion of sustainable transport, development proposals will have to reduce car dominance.
- 6.140 At the local level, Camden Local Plan Policy T1 (Prioritising Walking, Cycling and Public Transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.
- 6.141 The Site is located within Central London and therefore has access to a number of key services, which are within walking distance of the Site. The Site has an excellent public transport accessibility (PTAL 6b), which ensures excellent links to the Underground, National Rail and bus services.
- 6.142 London Plan Policy T4 (Assessing and mitigating transport impacts) states that when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that

impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.

- 6.143 A Transport Statement and Travel Plan have been prepared by Momentum Transport Consultancy to support the submission of this Application and concludes that there are no transport impacts placed on the local highway and public transport network.
- 6.144 The Proposed Development would not result in the generation of any new trips to the Site and therefore would have no impact upon the local highway and public transport network.
- 6.145 The parking arrangement would be as existing in line with the Estate wide vehicle and cycle parking strategy.
- 6.146 Overall, the proposed development satisfies the relevant policies set out in national, regional and local policy and guidance through encouraging sustainable transport use, providing good access to local services, and minimising additional pressure on local highways. As such, the Proposals should be found acceptable in terms of transport and highways.

CONSTRUCTION MANAGEMENT

- 6.147 The supporting text to Camden Local Plan Policy A1 (Managing the Impact of Development) (Paragraph 6.12) outlines that measures required to reduce the impact of demolition, excavation and construction works must be outlined within a Construction Management Plan (CMP).
- 6.148 A Construction Management Plan and Pro Forma has been prepared by Real PM and demonstrates how construction impacts would be minimised, in relation to site's activity during demolition and construction works and the transport arrangements for vehicles servicing the Site.
- 6.149 The Construction Management Plan and Pro Forma is in 'draft' and would be progressed to a final version should planning permission and listed building consent be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement.

FIRE SAFETY

- 6.150 Policy D5 (Inclusive Design) of the London Plan requires development proposals to achieve the highest standards of accessible and inclusive design. Development should provide safe emergency evacuation for all building users. As a minimum, at least one lift per core should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 6.151 Policy D12(A) (Fire Safety) of the London Plan requires all development must achieve the highest standards of fire safety, including:
1. *Identify suitably positioned unobstructed outside space: for fire appliances to be positioned on, and appropriate for use as an evacuation assembly point;*
 2. *are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire: including appropriate fire alarm systems and passive and active fire safety measures;*
 3. *are constructed in an appropriate way to minimise the risk of fire spread;*
 4. *provide suitable and convenient means of escape, and associated evacuation strategy for all building users;*
 5. *develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in; and*
 6. *provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.*
- 6.152 Under Policy D12(B), major developments should submit a Fire Statement prepared by a third party qualified assessor.
- 6.153 A Fire Statement has been prepared by Arup pursuant to Policy D12(B). The Statement demonstrates that the proposals are accessible, achieving high standards of fire safety, and confirms that the development is in accordance with D12(A). It therefore meets the requirements of the Development Plan.

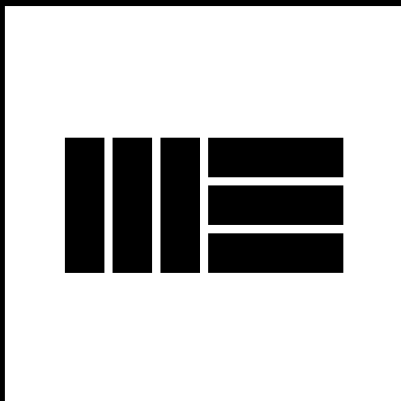
7.0 THE PLANNING BALANCE

- 7.1 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.
- 7.2 The Statement provides a detailed assessment of Proposed Development 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.
- 7.3 The Application forms part of the Museum's principal energy transition programme ("The Energy Centre Programme") for its Bloomsbury Estate and is designed to address matters of energy efficiency, sustainability and staff welfare accommodation.
- 7.4 This Application would assist the Museum's aspiration to transition to low-carbon sustainable systems, replacing critical life-safety infrastructure, and providing appropriate facilities for the maintenance and upkeep of the Museum. The works would likewise support the future upgrade of M&E and distribution and services to each of the galleries and collections storage.
- 7.5 With respect to the Proposed Development itself, it would deliver a number of benefits. These are summarised below.
- 7.6 The proposed new buildings 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.
- 7.7 The proposal incorporates enhancements to biodiversity and landscaping as encouraged by London Plan Policies G1 and G5 and Local Plan policy A3.
- 7.8 The proposed buildings would be highly sustainable with the pre-assessment indicating it achieves a BREEAM rating of 'Excellent'. The buildings 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.
- 7.9 The buildings would incorporate new permanent fit for purpose accommodation, aiding the removal of the temporary portacabins 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.
- 7.10 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 the historic British Museum fabric.
- 7.11 In respect of the former, the rationalisation of the existing energy infrastructure and the implementation of new sustainable infrastructure unlocks a much broader decarbonisation programme and is achieved without harm to heritage interests for the reasons set out in the Heritage Statement. The proposed SWEC building would not affect the way the intrinsic interest of the historic galleries, their function, or the display of objects, but would deliver the long-term future benefit for the Museum supporting the display, conservation and management of the collections.
- 7.12 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.
- 7.13 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.

8.0 CONCLUSION

- 8.1 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 a new energy centre and infrastructure support services ancillary for the operation of the British Museum (Use Class F1(c), formerly Use Class D1).
- 8.2 The Application seeks planning permission and listed building consent for the following description of development:
- “Demolition of existing Energy Centre to internal West Road. Removal of temporary buildings to the south of the existing energy centre on the internal West Road and to the north and east of the White Wing facing Montague Street. Erection of new energy centre incorporating maintenance support accommodation to internal West Road, new substation off Montague Street, all together with associated internal and external works, service runs, erection of plant, landscaping, and temporary works associated with construction.”***
- 8.3 The Proposed Development includes the following:
- A new Energy Centre in the south-western corner of the Estate (“South West Energy Centre” / “SWEC”);
 - A new incoming switch room in the southeastern corner of the Estate (“Incoming Substation” / “ISS”);
 - Infrastructure distribution which connects the new plant systems to secondary plant rooms / systems across the Estate; and
 - Temporary and / or permanent enabling works required to other existing buildings/structures around the Estate to enable the development proposals to be constructed.
- 8.4 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. In addition to an extensive public consultation with feedback aiding the evolution of the scheme.
- 8.5 This Planning Statement demonstrates that the proposed scheme would deliver the following benefits:
- Two new buildings of high architectural quality;
 - Removal of poor quality temporary buildings that detract from the listed buildings and conservation area;
 - Design centred on sustainability and energy efficiency;
 - Increased biodiversity with proposed landscaping; and
 - Safeguarding the museum’s long-term operation and future
- 8.6 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 surrounding townscape, including Bedford Square.
- 8.7 In respect of each heritage asset considered, significance is preserved in line with the three statutory provisions cited in Section 2 of the Heritage Statement. In respect of the Museum itself, a major benefit is identified from the delivery of the infrastructure required to support the Museum’s operational requirements and the necessary maintenance of its fabric, and the betterment of its estate, including areas visible from the public realm. The enhancement of elements of its setting likewise comprise enhancements to the character and appearance of the Bloomsbury Conservation Area. In relation to all other assets potentially affected by the proposals – listed buildings in the surrounding streets, the listed entrance gates, railings and lodges to the Museum and the Bedford Square RPG, we find that significance, and the contribution made by setting to significance, is preserved.
- 8.8 For these reasons and as set out within this report, we conclude that the Proposed development satisfies the statutory tests (S16(2), S66(1) and 72(1)) and the requirements of the cognate national and Development Plan policy as identified in this report.
- 8.9 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.
- 8.10 We therefore respectfully consider that the proposals are appropriate and planning permission and listed building consent should be granted.

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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.