

16 July 2024

London Borough of Camden
Development Management Team
5 Pancras Square
London
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FAO Elaine Quigley and Catherine Bond

Dear Officers

Full planning and listed building consent application | New and replacement external lighting to the British Museum estate, London WC1B

Introduction

On behalf of the Trustees of the British Museum (BM), we enclose an application for full planning and listed building consent to install new and replacement external lighting around a number of public and private external spaces across the British Museum site, on Great Russell Street, London, WC1B 3DG.

The lighting is proposed to be installed within three main external spaces of the Museum; the South Forecourt which is public space, and the East and West service roads which are primarily private back-of-house service areas which can be partially viewed from Great Russell Street and Montague Place.

The proposed works were discussed with LBC and HE officers at the quarterly meetings on 14th December 2023 and 7th March 2024. A site visit also took place in January 2024 with subsequent comments provided by LBC. This advice has been considered in the development of the proposals and a response to the comments has been provided in the design note prepared by Nex Architecture addressing each of the pre-application comments.

The proposed description of development is:

"Installation of new and replacement external lighting within the British Museum estate".

Submission content

This application has been submitted via the planning portal (ref. PP-13189387). The following forms the submission and supporting documents:

- Application and CIL forms;
- Drawing pack, prepared by Nex Architecture
- Design & Access Statement, prepared by Nex Architecture;
- Design note addressing pre-application comments, prepared by Nex Architecture;
- Exterior Lighting Specification and Equipment Schedule, prepared by Steensen Varming;
- Exterior Luminaire Datasheet, prepared by Steensen Varming; and
- Heritage Impact Assessment, prepared by Dannatt, Johnson Architects

The relevant planning application fee of £2605 has also been submitted. There is no fee for an application for listed building consent.

The Site

British Museum Estate | The BM is one of the UK's most popular visitor attractions. BM was founded in 1753, the first national public museum in the world, and has been open to the public since 1759. With approximately eight million objects in the collection, it is arguably the world's greatest display of human history, culture and art. Both permanent collections and special exhibitions are presented within displays for the public. The original elements of BM date back to 1755- 1822 when Montague House was purchased to house the new BM collection. There was a need to expand BM as the collection grew bigger. Robert Smirke was the designer of a masterplan which dates from 1823-47. His plans consisted of four wings with an impressive iconic colonnade along the building's south elevation. The BM is Grade I listed and is bounded by Montague Place, Montague Street, Bloomsbury Street and Great Russell Street.

This application relates to three external areas of the Museum - the South Forecourt, and the East and West service roads.

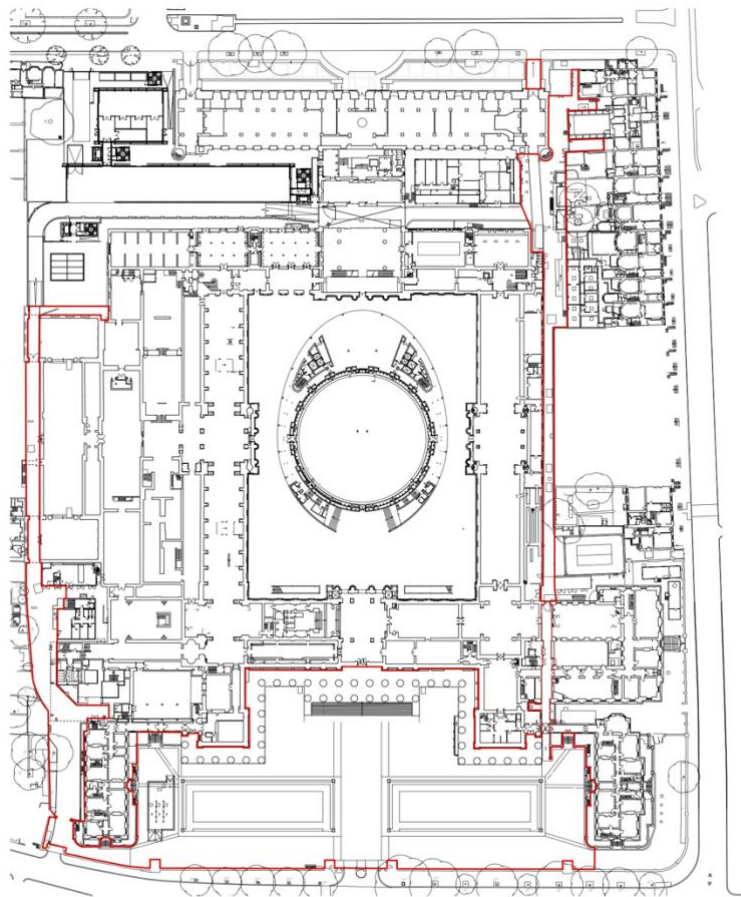


Figure 1 – Site Plan.

Surrounding uses and designations | These include a range of commercial office, hotel, residential and education uses. The BM is located in the Midtown BID district (Holborn, Bloomsbury, St Giles), an Archaeological Priority Area, the Background Strategy View (Blackheath), and the Central Activity Zone (CAZ).

The historic designations that apply to the application site are as follows:

- BM - Grade I Listed
- Main entrance gateway, railings and attached lodges to the BM – Grade II* Listed
- Eighteen lamp posts on the forecourt of the BM – Grade II Listed

- BM King Edward VII Galleries and attached wall and lions – Grade I Listed
- Bloomsbury Conservation Area

The BM is located within an area of excellent transport accessibility with a PTAL rating of 6b. It is close to Russell Square, Holborn, Tottenham Court Road and Goodge Street tube stations, several bus routes operate along Southampton Row and Bloomsbury Street. There are cycle networks in close proximity with secure bike stands. There is a Santander bike hire stand towards the junction between Great Russell Street and Montague Street.

Conservation Plan & heritage significance | The BM's Conservation Management Plan (CMP), third revision dated February 2023, contains a detailed appraisal of the significance of the BM as a whole and highlights that it represents the high point of neo-classical Museum style in the UK. As noted above, much of the BM's estate is Grade I listed, being of international significance and sitting in the Bloomsbury Conservation Area. The Site was constructed under numerous phases from Smirke's Quadrangle masterplan to the 21st century WCEC. There is innate value in the historical built fabric overall, especially where it survives from the earliest building phases. The use of pioneering construction techniques and innovative design across the phases is also important as are the BM's association with a succession of architectural figureheads. Its special architectural and historic character can in part be attributed to the significance of its collection and the considerable social value attributed to its use as a Museum; containing some of the world's most valuable and coveted collection of ancient artefacts. The BM was founded on the principle that its collection was for the nation and would, therefore be accessible to everyone. This is a key theme which continues today and is a driving force behind much of the BM's decision making and future planning.

The Bloomsbury Conservation Area Appraisal states that "the British Museum is a cultural institution of international importance, occupying a major ensemble of outstanding Grade I listed buildings which make a significant contribution to the character and appearance of the conservation area as a whole". It recognises that large portions of the BM cannot be seen from the public realm due to the 'backland nature of much of the site'.

The South Forecourt forms the immediate setting for the south side of the Museum, being the circulation space through which the public pass before entering, and was constructed along with the railings in 1851-53. The CMP defines this area as a "defined space and its character is principally drawn from the landscaping (hard and soft), prominent boundary railings and back-drop of the monumental south elevation". The HIA further expands that the South Forecourt is part of the original Sir Robert Smirke masterplan and was constructed under Sydney Smirke. The HIA notes the South Forecourt and approach to the Museum's main entrance from Great Russell Street is one of the most significant and identifiable aspects of the building and its setting.

The East service road is a back-of-house service corridor and road way which runs at basement level along the eastern side of the BM. It was largely formed during the period of 1843-1850, during the early development of the BM. The southern part of the east road passes under the White Wing while the north end of the east road is formed by the elevation of the JJ Burnet King Edward VII building. The submitted heritage statement therefore states the east road is considered to be in the context of the BM's grade I listed status.

The West road is another back of house service road, which contains the South Gate on Great Russell Street, which forms part of the historic railings. The west road started formation at the same time as the construction of the West Residence, which was designed by Sir Robert Smirke as residences for the principle staff of the museum and constructed 1843-46. Regarding it's significance, the submitted heritage statement states that the significance is its context within the grade I listed BM site and the specific historic buildings that form the elevations to Bloomsbury Street.

Planning History

The British Museum has a vast planning history, of relevance to this application are listed below:

In January 2010, planning permission was granted for the erection of a 5-storey building (plus 3 basement levels) with roof level plant to provide a special exhibition gallery, logistics bay (accessed via new vehicular lift off Montague Place) collection storage facilities, conservation laboratories, associated offices and management facilities for the BM, as well as associated alterations to the facades of the North Range and King Edward Building (ref. 2009/4638/P). Subsequently a discharge of conditions application providing details of the external lighting was approved in April 2014 (ref. 2013/2803/P). This external lighting included the illumination of the building's façade, and a façade illumination study was submitted to ensure the calculated brightness for the proposed lighting takes into account the brightness of the surrounding area. The façade lighting consisted of 2 500mm LED luminaires mounted 2500mm apart.

In November 2015, planning and listed building consent was granted for the provision of new vehicle barriers, CCTV & lighting to the north east and south west entrances (ref. 2015/3236/P & 2015/3237/L). This consisted of the alteration of existing vehicular control arrangements via the installation of new manually operated retractable bollards, with associated CCTV and lighting updates including a new dome camera and low/high level search lighting. The lighting in the north east and south west entrances is being updated via this current application.

Additionally in one of the BM's perimeter properties, 1 and 1a Montague Street, planning and listed building consent was granted in May 2018 for external and internal works including the provision of external lighting on the rear and side ground floor elevations (ref. 2017/4112/P & 2017/4724/L).

The proposed works were discussed with LBC and HE officers at the quarterly meetings on 14th December 2023 and 7th March 2024. A site visit also took place in January 2024 with subsequent comments provided by LBC, which have informed the proposed lighting scheme.

Proposal

In 2022, the BM identified a need for improved external lighting across several areas around the museum, both public and private, which have been inadequately lit, therefore leading to uncomfortable and potentially unsafe conditions for both the public and staff at dusk and during the night. Several of these areas do also not meet minimum lighting standards or have highly contrasting lighting, with light levels varying dramatically from less than 1 Lux to over 150 Lux.

As a result, the BM plan to upgrade these external areas to ensure they meet the minimum lighting standards for general access areas and means of escape, to ensure the safety of visitors, staff and occupants of the building. The proposed light fittings have been sensitively selected to ensure they fit into the historic and the surrounding context. Careful consideration has also been made to ensure the proposed lighting avoids light spill or glare into the neighbouring streets and properties. All the light fittings will minimise adverse impact on the historic fabric and be reversible. The fittings and their fixing approach into building fabric has been carefully considered.

Additionally, the BM will take advantage of this upgrade to remove any life-expired or incongruous fittings and associated bracketry and where possible like-for-like making good is adopted, to ensure an improved and consistent appearance for the lighting fittings across the BM site is created.

The lighting is proposed to be installed within three main external spaces of the Museum; the South Forecourt which is public space, and the East and West service roads which are primarily private back-of-house areas which can be partially viewed from Great Russell Street and Montagu Place.

South Forecourt

The existing condition in the South Forecourt is very dark after sunset, with almost all spaces away from the north axis between the South Colonnade and South Gate being below 5 lux. The existing lighting consists of heritage lampposts,

downlights within the coffers of the South Colonnade and spotlights and floodlights affixed to the gatehouse around the south gate.

The proposal therefore plans to increase the flat areas to a compliant 5-10 lux and the south steps, entrances to east residence and south west wing to a compliant 15-20+ lux. Four types of lighting – spot lights, projector lights, bollard lights and a handrail light – are to be installed across the forecourt as shown below. Due to the heritage value and high significance of the south forecourt, the proposed light fixtures have been designed to have as little visual and physical impact on the existing fabric as possible. Further detail on the proposed light fixtures has been provided in the submitted DAS.



Figure 2 - Proposed types of lighting.

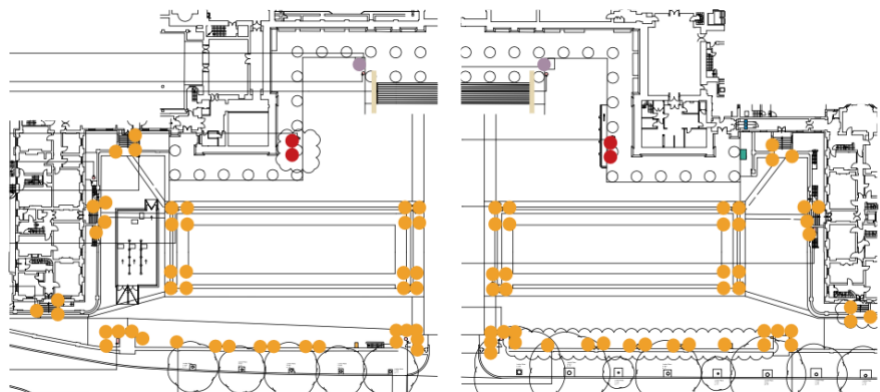


Figure 3 - Proposed lighting layout in the south forecourt.

East Road

The existing lighting within the East Road includes various types of wall-mounted lights affixed to the west side of the road and various soffit mounted fittings to the underside of the passageways at the south and north ends of the roads. The primary issues with this lighting is that a number of areas are below 5 and 10 lux, and there are issues with glare from existing fittings and a number of unused, incongruous and different fittings.

The proposal for the East Road is to remove all existing wall and soffit-mounted lights, which have no historic value and are life-expired or inadequate, and replace them with a new wall and soffit-mounted lights which are consistent in appearance



Figure 4 - Proposed types of lighting.

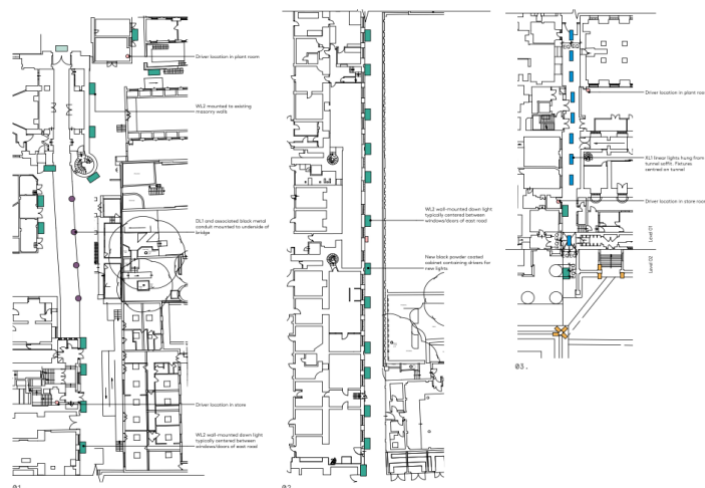


Figure 5 - Proposed lighting layout in the east road.

New cable runs will also need to be installed and will either be clipped to existing metal work without conduit to allow a very minimal profile, or housed in black painted metal conduit where long term durability outweighs the need to be hidden as possible, for instance in the East and West roads which are less historically sensitive. In the South Forecourt the cable networks are located in underground trenches and wall mounted cable trays are avoided to ensure minimal harm to the historic fabric and context.

Additionally, the LED light fixtures require physical drivers which need to be located within 30 metres of each luminaire. Therefore, they will either be located internally within existing plant or store areas, or where there is no internal space accessible a new weatherproofed metal cabinet will be installed, hidden from public view.

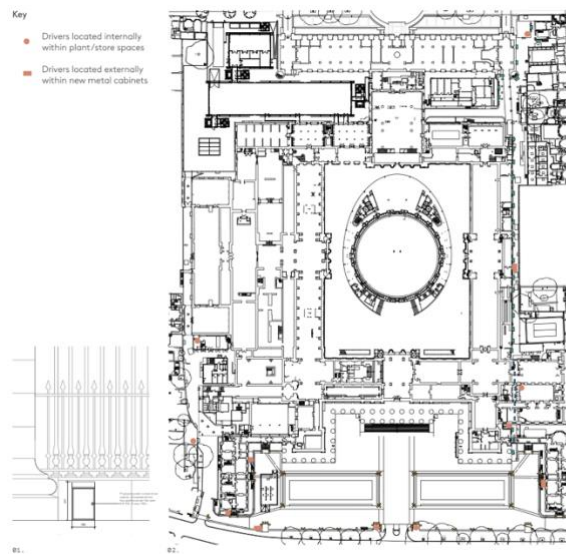


Figure 8 - Proposed location of the internal/external drivers.

Planning policy context

The policies within The National Planning Policy Framework 2023 (NPPF) (including the NPPG); and the Development Plan form a material consideration in the determination of this application. The Development Plan is formed of GLA's London Plan (LP) 2021 and the Camden Local Plan adopted in July 2017. These documents are supported by Camden's Planning Guidance Note on Design; and the Bloomsbury Conservation Area Appraisal 2011.

Additionally, a Regulation 18 consultation on the draft new Camden Local Plan (January 2024) took place from 17 January to 13 March 2024. No further consultations have taken place yet, therefore this holds limited weight.

The adopted LBC planning policies most relevant to the consideration of the works presented as part of this application include D1 (Design), D2 (Heritage), A1 (Managing the impact of development), C1 (Health and wellbeing), C5 (Safety and security), and CC1 (Climate change mitigation). Policy D2, reflects the aims of the NPPF: developments that involve the loss or substantial harm to a designated heritage asset will not be permitted unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Developments that propose less than substantial harm are required to be convincingly outweighed by the public benefits of the proposed works. Development should also preserve or enhance the historic environment and heritage assets. LBC will resist development that would cause harm to significance of a listed building through an effect on its setting. Policy D1 requires development to be of sustainable and durable construction, which respects the local context and preserves the heritage assets and is designed to minimise crime and antisocial behaviour.

Regarding amenity, policy A1 seeks to ensure the amenity of neighbours is protected and requires mitigation measures where necessary, and considers factors such as artificial lighting levels. Policy C1 also requires development to positively contribute to creating high quality, active, safe and accessible places, with policy C5 further stating appropriate security and community safety measures should be provided in buildings and spaces. Sensitive energy efficiency improvements are also supported and encouraged via policy CC1.

LP Policy HC1 (heritage conservation and growth) requires development proposals affecting heritage assets, and their settings, to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Other relevant guidance is Historic England's Conservation Principles, Policies and Guidance (April 2008). Paragraph 117 of the documents confirms that repair necessary to sustain the heritage values of a significant place is normally desirable if:

- a) there is sufficient information comprehensively to understand the impacts of the proposals on the significance of the place; and
- b) the long term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future; and
- c) the proposals are designed to avoid or minimise harm, if actions necessary to sustain particular heritage values tend to conflict.

Furthermore, LP policy D5 (Inclusive design) requires area to be able to be entered, used and exited safely, easily and with dignity for all. LP policy GG6 (Increasing efficiency and resilience) also states development must improve energy efficiency and support the move towards a low carbon circular economy.

Policy Assessment

The proposed works are essential to provide the effective illumination required to improve access and safety for pedestrians and vehicles at the BM, while still respecting the museum's architectural and cultural significance. They will also bring a level of consistency in the type of fittings and finishes proposed, as opposed to the ad-hoc way services installations have previously been installed, so as not to detract from the setting of the BM.

Heritage and Design | In accordance with NPPF paragraph 194, the significance of the South Forecourt and East/West roads affected has been described within the submitted HIA. In accordance with paragraph 199 of the NPPF great weight has been given to the assets conservation. Where a development proposal leads to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (paragraph 202).

Policy HC1 of the London Plan also states developments should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. Policy D1 of the Local Plan requires development to be of sustainable and durable construction, which respects the local context and character, as well as preserve strategic and local views and the historic environment. Policy D2 of the Local Plan does not permit the loss of or substantial harm to a designated heritage asset. These policies reflect the aims of the NPPF, with developments that propose less than substantial harm being required to be convincingly outweighed by the public benefits of the proposed works.

The submitted HIA states that the proposals bring a level of consistency in the type of fittings and finishes proposed, which aligns with Conservation Plan Policy 4.18, which requires services installations to have the minimum impact on the character of the space. Additionally, the removal of existing visually dominant but poorly performing fittings and their associated cable installations will provide a heritage gain in the reuse of existing routes and minimise the number of interventions and new routes in existing fabric required. Furthermore, it states as the installations are reversible, with minimal repair work to mortar and bound gravel surfaces required, there will be no damage or alteration of existing fabric if removed in the future.

The HIA therefore concludes that the proposal will have an overall neutral impact which will result in the lowest end of the scale of 'less than substantial harm', when measured against NPPF clause 202. The works are essential to improve the general illuminance and presentation of the BM, and the less than substantial harm is greatly outweighed by the public benefits to the continued safe functioning of the external BM spaces for the public, staff and vehicles.

As laid out in the proposal section above, the proposed lighting has been designed to provide comfortable, even, warm (below 3000K) levels of light that meet current standards, and will subsequently improve the inclusivity, environment and

safety of the external areas for the public, members of staff and vehicles. The style of fittings will also enable a cohesive and consistent style throughout the south forecourt and east/west roads. Their style has also been designed to ensure they clearly differentiate from the existing historic fabric and are completely reversible.

Additionally, as promoted in LBC policy CC1 and LP policy GG6, the lights will all be LED to ensure low energy consumption, long lifespan and minimal heat production to ensure sensitive energy efficiency improvements are made.

As a result, the proposed light fittings will have a neutral impact and be in the lowest end of the 'less than substantial harm' scale, which is greatly outweighed by the benefits of the scheme. This proposal is, therefore, also in accordance with the NPPF, LBC policies D1, D2, C1, C5 and CC1, as well as LP policies HC1, D5 and GG6.

Amenity | LBC policy A1 seeks to ensure the amenity of neighbours is protected and requires mitigation measures where necessary, and considers factors such as artificial lighting levels. The proposed lighting has been sensitively designed to prevent spill or glare around the site or towards neighbouring properties and streets. Lighting is being positioned and orientated to light only the required areas and excessive lighting is being avoided. The lighting will be sympathetic to the existing building and atmosphere within the external spaces, and the surrounding streets and neighbouring properties, and is therefore in accordance with LBC Policy A1.

Conclusion

The proposed works are essential to provide the effective illumination required to improve access and safety for pedestrians and vehicle at the BM. They will also bring a level of consistency in the type of fittings and finishes proposed, as opposed to the ad-hoc way services installations have previously been installed. Their design and layout is sensitive to the BM's architectural and cultural significance, and the HIA therefore has concluded that the proposal will have an overall neutral impact which will result in the lowest end of the scale of 'less than substantial harm'. This less than substantial harm' is also greatly outweighed by the public benefits to the continued safe functioning of the external BM spaces for the public, staff and vehicles.

Overall, the proposal will support BM's function and thus enhances its international important status. The proposals will also enhance the historic interest of the building and therefore comply with the local and national policies.

In accordance with the agreed terms of the BM Planning Performance Agreement (clause 9.3(h)) we look forward to confirmation of validation of the application within 3 working days of submission, or notification within the same timeframe to confirm if additional information is required.

If you have any questions, please contact Melanie Gurney at melanie@theplanninglab.com.

Yours faithfully,

The Planning Lab