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13 September 2024

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall, Judd Street
London
WC1H 9JE**F.A.O. Elaine Quigley**

PLANNING PORTAL REF. PP-13367268

Dear Sir / Madam

**THE EAST WING, THE BRITISH MUSEUM, GREAT RUSSELL STREET, LONDON WC1B 3DG
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990
APPLICATION FOR LISTED BUILDING CONSENT**

On behalf of our Client, the Trustees of the British Museum ("the Museum" / "the Applicant"), please find enclosed an application for Listed Building Consent ("the / this Application") at The British Museum, Great Russell Street, London, WC1B 3DG ("the Site").

The description of development for these proposals ("the Proposed Development") is as follows:

"Installation of secondary glazing at levels 1 and 2 of the East Wing, internal boarding to rooflights at level 7 and associated works".

The works are proposed following the Museum's Energy Centre Programme (ECP) planning applications, which have either been granted or received resolution to grant at the time of writing. The ECP is the Museum's proposal to switch to an all-electric energy system and major part of their strategy to achieve Net Zero Carbon.

The Museum will remain operational during the works permitted under the ECP applications and therefore secondary glazing is required in those buildings on the Museum's Estate which are in closest proximity to the works. This will mitigate construction noise and allow the operations of the Museum to continue during the works. The East Wing is one of the buildings in proximity to the works.

APPLICATION DOCUMENTS

The following documents are enclosed with this application:

DOC NO.	DOCUMENT TITLE	AUTHOR
1	Document Schedule	Montagu Evans
2	Completed Application Form (with Ownership Certificates)	Montagu Evans
3	Covering Letter including Heritage Statement (This Letter)	Montagu Evans
4	Site Location Plan (1:1250)	Wright & Wright
5	Site Plan (1:500)	Wright & Wright
6	Drawing Issue Sheet	Wright & Wright
7	Application Drawings	Wright & Wright
8	Design and Access Statement	Wright & Wright
9	Noise Report	Bickerdike Allen & Partners

APPLICATION FEE

The Application fee has been calculated in accordance with the Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment) (England) Regulations 2012 (Statutory Instrument No. 472) (as updated). In accordance with regulations, no fee is applicable for Listed Building Consent.

Planning and Heritage Statement

The Site and Buildings

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

The British Museum estate spans over a total area of approximately 9.2 hectares. The Site which this Application relates to is located within the eastern portion of the Museum's estate backing onto the properties along Montague Street. A Site Location Plan is submitted with this Application [ref. SW001-WWA-1000-X-DDG-A-1000 P4], which shows the Site in the context of the surrounding area.

Significance

The British Museum is a Grade I listed building. A copy of the list description is included at **Appendix 1** to this statement.

A Conservation Management Plan for the Museum has been prepared by the Museum and has been consulted in the preparation of this application.

The Long Room, which is located behind what was originally the Royal Library is highly significant for its historic value in illustrating how the Museum started to expand early on in its history. It also holds further historic value with Panizzi's influence as well as being one of the final areas designed by Robert Smirke before his retirement.

The windows located in the East Wing differ in age. The Level 1 (basement) windows are original but are formed of metal Crittall which is reflective of the utilitarian nature of the basement environment. We note from the CMP Gazetteer that windows were introduced along the east side of the Long Room in 1938 and 1970. The windows at this level of the East Wing are low in significance due to their later additions and since they do not form part of the original design intent for the Long Room.

We understand from the CMP Gazetteer that the original design intent for the level 2 (first floor) windows was for two large rooms used as a library. The design was then amended to be one large room spanning the full length of the King's Library which was lit only by rooflights and one study to the north end. This is not, however, the arrangement as existing. There were originally no windows on the east wall of the Long Room Library; however, following the subdivision of the library space at level 2 in 1858, a single large window was introduced to the east wall which was similar to those existing in the north end of the East Wing at level 2. Further alterations to level 2 in the Long Room were undertaken in 1871 and included the blocking of a large window in the east wall – it is uncertain when this windows dates from, however it is understood to have likely pre-dated the subdivision of the space in 1858. Between 1896 and 1902, further alterations were made to the South End of the Long Room at level 2 which included the enlargement of the existing east window and the introduction of two further windows to match in the east wall to the north. The East Wing has two instances of single sash windows which are unusual and attractive, although the date of these windows is not known from the Gazetteer.

All other windows existing on level 2 of the East Wing date from 1926 onwards, with the majority (7 windows) dating from the 1970s. The differing proportions of the 1970s windows is evident when viewed externally as well as internally and can be viewed along the east wall. These windows share no relationship with the original constructional detail. None of the windows present at level 2 reflect the original Smirke design intent and have been added at a later date.

The East Wing, specifically the Long Room, is a highly significant part of the Museum mainly for historic connection and architectural value linked to Robert Smirke. However, the windows within the East Wing have been largely altered over time and no windows formed part of the original design intent on Level 2 which detracts from the special interest of the windows in this area. While the windows at level 1 are original in form, they are of a utilitarian nature due to the basement location and for this reason, they are less sensitive in nature to change than other more prominent original windows across the British Museum Estate. Overall, the high significance of the East Wing is not intrinsically derived from the windows on either level 1 or level 2.

Planning History

On the 17 July 2024, planning permission and listed building consent (2023/2020/L & 2023/1848/P) were granted on for the following development:

"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)."

Pre-commencement conditions have been discharged and works are due to commence imminently.

A resolution to grant planning permission and listed building consent (references 2023/4648/P & 2023/4903/L) was made on the 21 March 2024 for the following development:

“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 following demolition of existing Energy Centre to internal West Road and 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.”

The legal agreement for this development is close to being completed with detailed design progressing towards discharging pre-commencement conditions and obligations with a view to starting the works late in 2024.

Need for the Proposed Works

The presence of offices, conservation and research studios, and public galleries requires special attention to ensure that noise levels are adequately controlled during the construction process to ensure those areas can remain operational during the years the work is carried out.

A noise and vibration survey has been conducted by Bickerdikey Allen Partners to assess the impact of the works covered by the ECP applications. That report notes that the occupants of the buildings would experience significant noise levels during the works and that a combination of mitigation measures are required, which includes secondary glazing. Without such mitigation measures the Museum will not be able to remain operational.

The Museum has explored other options including working from home permanently and moving departments. The former was not considered to be possible in the timescales available given the Human Resources implications. The latter would require a significant reorganization of the Museum operations which would take a significant amount of time and potentially require further listed building consent applications in various parts of the Museum to accommodate the revised layout.

The mitigation that would be achieved by the secondary glazing is still above World Health Organization guidelines, and it would not be possible to achieve these guidelines without proposing more substantial secondary glazing. The proposals are therefore deemed to be the most efficient and effective way to allow the Museum to proceed to site, whilst also minimising the impacts upon the building while only making interventions where absolutely necessary.

The Proposals

The acoustic surveys ensure that the works are targeted and only installed where necessary. The East Wing houses

Critical Museum functions which these proposals will enable to continue. These include:

- Retail Buying & Publishing team offices
- Images & Mobile team offices
- Merchandise team offices
- Retail team hotdesk and storage
- Commercial Hire team offices

The proposals are for the installation of 21 units of internal secondary glazing within the East Wing at Levels 01 & 02. Additional sundry works to facilitate the project are listed on page 11 of the design statement which includes the temporary boarding over of the rooflights at level 7. In our view this work does not require listed building consent but is referred to for the sake of completeness and transparency. It is proposed that all windows, with the exception of one, will powder coated white RAL 9010 or 9003, with remaining one to be of an anodised bronze finish.

The secondary glazing product proposed has been subject to careful consideration and the design team has considered all options mentioned by Camden and Historic England. The SelectaGlaze is being proposed as it can be placed within the curved window frames, it allows for anodised bronze finish in key locations (which other suppliers do not provide), and it does not result in scarring of the built fabric as a result of adhesive strips. Furthermore, it can achieve the required acoustic mitigation based on the noise surveys undertaken by the Applicant.

The secondary glazing is only required as a result of the construction works and therefore the applicant proposes the following condition (or similar) be attached to any decision notice:

“Notwithstanding the details approved, the secondary windows referenced [Insert References] on the approved drawings shall be removed within X years of the date of this permission. The removal shall only be carried out in accordance with a methodology, which will include details of making good, to be submitted and approved in writing by Local Planning Authority.”

Statutory Provision, Planning Policy and Guidance

Statutory Provisions

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

S16(2), which requires a decision maker considering whether to grant listed building consent for any works, to 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.

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.

National Planning Guidance

The National Planning Policy Framework (the “NPPF”) was originally published in March 2012 with the latest revision published in December 2023 by the Ministry of Housing, Communities and Local Government. The NPPF sets out the Government’s economic, environment and social planning policies for England and supersedes the vast majority of previous Planning Policy Guidance Notes and Planning Policy Statements.

National policy on the historic environment imports the statutory duty and may be expressed as a series of principles:

- The significance of the heritage assets affected should be identified and assessed (para. 194, NPPF). Heritage interest may be archaeological, architectural, artistic or historic (Glossary, NPPF);
- The impact of the proposed development on the significance of the identified heritage assets is then to be considered (para. 199, NPPF);
- If the proposed development is considered to cause harm to the significance of a designated heritage asset, such harm should be categorised as either less than substantial or substantial, and in either category, the extent of harm should be clearly articulated (PPG paragraph 18). It is important to calibrate the extent of harm as this informs the balancing exercise required by para. 202 (see below);
- If a proposal would result in harm to the significance of a designated heritage asset, great weight should be given to the asset’s conservation (irrespective of whether the harm would be substantial or less than substantial) (paragraph 199 NPPF);
- Any harm to the significance of a designated heritage asset should require ‘clear and convincing justification’: para. 200, NPPF. This does not mean that the proposal must be tested against possible alternative designs to identify a design that would cause the least harm. Where the harm would be less than substantial, there must be countervailing public benefits which would outweigh the harm: para. 202, NPPF; and
- For this purpose, there is no further definition of “public benefits”. The term is broad enough to encompass enhancements to heritage assets, benefits to the way an area appears or functions, improvements to the townscape setting of heritage asserts, or more general land use planning benefits, such as sustainability enhancements

Statutory Development Plan

The adopted Statutory Development Plan for the Site comprises:

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

The London Plan treats heritage at Policy HC1, Heritage Conservation and Growth and requires that development proposals affecting heritage assets should conserve their significance, avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Camden Local Plan Policy D2 Heritage supports national policy and in respect of harm states that the Council:

‘will not permit loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss...’. And ‘will not permit less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm’.

Other Material Considerations

Other relevant planning guidance and material considerations include:

- National Planning Practice Guidance (online);
- Historic Environment Good Practice Advice in Planning Note 2 Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015);

The LB Camden have started the Local Plan review process that will cover a three year period from October 2022 to October 2025. An initial public consultation was held between November 2022 and January 2023. The next stage involves the preparation of the Draft Local Plan anticipated for Summer 2023. In light of this and in accordance with Paragraph 48 of the NPPF, the Draft Local Plan can only be afforded very limited weight given that it has not reached an advanced stage of preparation.

Assessment of Proposals

Principles of Development

The primary requirement of the Proposals is to introduce a tailored noise mitigation measure in response to the need to mitigate noise from construction in the East Wing which does not detract from the special interest of the historic fabric on a permanent basis. Given the Proposals respond to the mitigation of construction noise, they are proposed to be temporary in nature; providing a temporary solution which seeks to minimise the impact on the historic fabric. Historic England Guidance: Advice Note 18 “Adapting Historic Buildings for Energy and Carbon Efficiency” (July 2024) states that the installation of secondary glazing to windows will “*generally be acceptable*” and goes on to note that “*in most cases, the impact of its installation on significance will only cause minimal harm to historic fabric and architectural interest, which will generally be acceptable in view of the benefits obtained.*” The Proposed secondary glazing methodology has been informed by Historic England Guidance to respond appropriately to the retention of special interest of the windows and shutters where required.

The secondary glazing proposed is removeable and repairable, and it is proposed to repair any minor wear from the screws used during installation with hard, coloured wax in line with SPAB recommendations to mitigate harm to the historic fabric and retain its special interest (further details can be found in the accompanying Design Statement prepared by Wright and Wright). The British Museum is also procuring a condition survey to inform like-for-like repairs prior to installation of the secondary glazing, and this can be undertaken via internal access only.

The secondary glazing is proposed to be positioned in the reveals, and it will be aligned with the existing glazing bars for the least visual intrusion. The secondary glazing is openable to allow for routine cleaning and ventilation, as well as access for repair.

The East Wing buildings contain some windows which feature shutters from the 20th century (the specific date of these shutters is unknown as they are not mentioned in the Gazetteer). In this case, it is proposed to remove the unsightly 20th century shutters from East Wing as discussed with Historic England to further enhance the appreciation of the windows. The methods of removal for the shutters aligns with SPAB Guidance. The shutters will be stored on site until they can be reinstated following the removal of the secondary glazing.

Heritage Assessment

There are a number of approaches to the proposed secondary glazing which differ depending on the age, significance, and types of the windows in the East Wing. In some areas, such as the larger and older windows located on level 2, the introduction of the secondary glazing will detract from the appreciation of the window proportions, joinery, and fine detailing which contribute to the character of the room and their significance.

Particular care has been taken to match the colour of the secondary glazing finish to that of the existing frames as closely as possible to level 2 windows; hence the use of powder coated white frames in all but one case, which will be of an adonized bronze finish. This is only available with the SelectaGlaze product. This will further mitigate any visual impact and appreciation of the windows, allowing them to be more natural in the existing environment.

The installation of the windows follows a sensitive methodology to protect the special interest of the built fabric and allow for minimal intervention of screws. The frames are proposed to be fixed to the plaster board, timber panelling or masonry, avoiding the moulding and it will be recessed as deeply as possible to enable the reveal to continue to be legible where required and able. Regarding the removal of the glazing at the end of the construction period, any repairs will follow SPAB methodology, using colour matched wax which can expand and contract with the joinery to create an ‘invisible repair.’

The installation of secondary glazing to the windows located at level 1, basement, are not considered to materially affect the way the room is experienced or its character as a back of house space. We identify no harm from the installation in this area due to the utilitarian and back of house appearance and function of the space.

Shutters are present at both levels within the East Wing and these are proposed to be removed on a temporary basis and reinstated following the removal of the secondary glazing at the end of the construction period. We understand that there is scope, as requested by Historic England, for the removal of these shutters (dating from 20th century) to be on a permanent basis. However, for the purpose of this Application we propose these will be reinstated and can be the subject of further discussion with Camden and Historic England if there is not a desire to have these reinstated. The removal of the shutters on a permanent basis would be beneficial in the long run and result in a neutral effect if the shutters are not re-instated and the secondary glazing were in place.

In summary, the windows located in the East Wing do not carry high significance due to their age and type, and for this reason, we consider that the Proposals would give rise to a neutral effect on the appreciation of the windows and their character on levels 1 and 2. Furthermore, since installation of the secondary glazing is temporary, great care and consideration has been given to developing proposals which minimise the impact on the historic fabric and an approach has been adopted which allows for the Proposals to be reversed resulting in a net neutral effect in the long-run.

Conclusion

As demonstrated by the enclosed noise report, the proposed secondary glazing is necessary to allow the Museum to remain operational while it delivers the ECP, to substantially reduce the Museum's Carbon Emissions.

From the above assessment, it is clear that the proposals have been sensitively developed to minimise the impact of the glazing on the listed building, having regard to the specific constraints of each window's type. Given the temporary nature of the proposals and the proposed works to make good, we conclude the proposals to be acceptable, noting the need to deliver wider Museum improvements.

For these reasons we conclude that the proposed development satisfies the statutory tests (S16(2), S66(1) and the requirements of national and local policy.

We would be grateful if the London Borough of Camden could confirm that our Application is complete and will be validated shortly. In the meantime, should any further clarification, information or assistance be required please do not hesitate to contact Rosie Adamson (Tel. 07990 273 260 / rosie.adamson@montagu-evans.co.uk), Graham Allison (Tel. 020 7312 7421 / graham.allison@montagu-evans.co.uk) or Shonagh Ramsay (Tel. 07584 154 755 / Shonagh.ramsay@montagu-evans.co.uk) of this office in the first instance.

Yours faithfully



Montagu Evans LLP

Enc.