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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-13367273

Dear Sir / Madam

**THE WEST RESIDENCE, 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 level 5 of the West Residence 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 West Residence 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 southwest portion of the Museum's estate fronting Great Russell Street. A Site Location Plan is submitted with this Application [ref. SW001-WWA-1000-X-DDG-A-1002 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 preparing these applications.

The West Residence was originally conceived as part of Sydney Smirke's 1823 masterplan for the Museum and was constructed in the 1840s in tandem with the East Residence. The East and West Residences originally contained four houses each (referred to as 'apartments' or 'residences') for high-ranking Museum officials and the West Residence housed the Secretary's House, as well as an apartment for messengers with its entrance to the rear. The original floor plan featured full height party walls continuing through all levels; these have now been subject to some alterations including the introduction of new connecting doors across several levels. The messenger's apartment (residence 8) was finished to a basic standard and forms the most basic part of the building.

The building is clad with Portland stone, with the south and east elevations being the most formal demonstrated through a giant order of pilasters supporting a full entablature and seated upon a basement storey acting as a plinth.

The West Residence is very highly significant architecturally and historically as it forms a prominent part of Sydney Smirke's original masterplan for the Museum and highlights the relationship between the West Residence itself and the Museum through a shared architectural language, expressed through monumental classical detailing. There is further historic interest derived from the notable figures who occupied the residences over time, such as the Museum Director.

Level 5 (the second floor) of the West Residence, to which this Application pertains, formerly comprised parts of Residence 5 (the former Secretary's House), Residence 6 (the former Centre House), Residence 7 (the former Southern House), and Residence 8 (the former Messengers' Apartments).

Level 5 of Residence 5 is located to the north end of the building retains some of its original features including the original run cornice, moulded skirting, doors, and sash windows and shutters within the principal rooms which date from c. 1843-46 according to the CMP Gazetteer. The staircase and landing within this residence is the original stone cantilever tread staircase with cast iron balustrade, mahogany handrail, and sandstone floor. To the far north of Residence 5 stands a largely modern construction housing toilets. There is some more modern, 20th century partitioning within some of the rooms and modern panelled doors.

Level 5 of Residence 8 is located next to Residence 5, in the centre of the building and retains a number of original features including the original staircase and balustrade as well as the original windows and panelled shutters. Residence 8 is the most basic apartment, featuring few detailing and simple finishes – many of which have survived. There has been some subdivision of rooms which is wholly modern and some more recent openings introduced.

Level 5 of Residence 6 is located between Residence 8 and Residence 7 and also retains the original staircases, balustrades, and handrails as well as the original water closet and its four-panel door on the half landing. Further original detailing which has survived includes some rainwater goods, cornicing, architraves, cupboard doors, and sash windows and shutters. Some alterations introduced over time include the modern partitions subdividing the larger rooms, replacement modern fireplace surround and some walls have been knocked through.

Residence 7 is located to the south end of the building, much like the other residences, Residence 7 has retained the original staircases, balustrades, and handrails as well as some run cornicing, picture rails, moulded skirtings, and door architraves. The windows are understood to be original, and the panelled shuttering has also survived. Some of the rooms

within Residence 7 have been altered for new uses such as a kitchen and some doors have been replaced. Modern alterations introduced some further subdivision within this part of the building as well.

The windows in the West Residence are a repeated window type; a sash pane, with a single closing shutter on either side, and set within a decorative reveal (type G). There is also typically (but not always) a radiator within the reveal depth.

The West Residence retains many original features, the windows and shutters being one of these, and for this reason it is highly significant and sensitive to change.

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 Bickerdike 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.

The Proposals

The acoustic surveys ensure that the works are targeted and only installed where necessary. The West Residence houses Critical Museum functions and these proposals will enable them to continue. The functions include:

- Advancement staff offices
- OR staff offices
- ITE staff offices

The proposals are for the installation of 15 units of internal secondary glazing within the West Residence at Level 05. All windows are of the same type of detail (type G) and will be of a white powder coated finish to RAL 9010.

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 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

Principle 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 West Residence 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 the windows 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, allowing the windows to continue to be legible. The radiators will not be enclosed within existing or new glazing to avoid condensation issues, and the secondary glazing is openable to allow for routine cleaning and ventilation, as well as access for repair.

Heritage Assessment

The secondary glazing proposals for the West Residence pertain only to the windows on level 5 (second floor) and comprise a total of 15 windows. The window types are all type G, featuring a sash pane, with a single closing shutter on either side, and set within a decorative reveal and there is also typically (but not always) a radiator within the reveal depth. The installation of secondary glazing inevitably changes the proportions of the windows for the period of installation, however the works are reversible and repairable following the SPAB method using hard, coloured wax to make good.

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 white powder coated finish to RAL 9010. This will further mitigate any visual impact and appreciation of the windows, allowing them to be more natural in the existing environment.

It is noted in the CMP Gazetteer that there was some former secondary glazing present on several of the windows within the West Residence at level 5 which we understand are no longer in place. This likely explains why some of the shutters are already pinned back. Historic England Guidance: Advice Note 18 “Adapting Historic Buildings for Energy and Carbon Efficiency” (July 2024) states that “*Exceptions [to secondary glazing] may include [...] buildings with historic shutters which would be damaged or rendered inoperative by the installation.*” However, it goes on to note that despite this, “*in many of*

these cases, temporary secondary glazing used seasonally will generally be acceptable.” Since some of the shutters within the West Residence have already been subject to pinning, it is unlikely that these shutters will be able to be operational during installation of the secondary glazing since there is minimal space between the shutter and the existing windows which is not sufficient to install the type of secondary glazing which is required to achieve the certified acoustic performance. However, it is the proposed approach to bring the shutters back into use following the removal of the secondary glazing which is in line with Historic England guidance. Further details pertaining to the methods of installing the secondary glazing on windows with shutters can be found in Chapter 3 of the Design and Access Statement prepared by Wright and Wright which accompanies this Application.

The temporary nature of the works is material to our conclusions in respect of window type G where we consider the impact would not be acceptable on a permanent basis for the reasons we have cited above. Heritage values are enduring, and in the proposed condition, following the removal of the secondary glazing and the repair of the affected windows, the character and proportions of the rooms will be restored. We therefore consider the impact on significance to be net-neutral. We anticipate that the removal of the glazing and repair in accordance with the approach set out within the Design Statement would be secured through condition on any forthcoming consent.

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.