

16 September 2024

London Borough of Camden  
Development Management Team  
5 Pancras Square  
London  
N1C 4AG

FAO Elaine Quigley and Catherine Bond

Dear Officers

**Listed building consent application | Contractors' toilets refurbishment and reconfiguration at the British Museum, London WC1B**

**Introduction**

On behalf of the Trustees of the British Museum (BM), we enclose an application for listed building consent to refurbish and reconfigure the contractors' toilets located in the far northwestern point of sector E of the British Museum, London, WC1B 3DG.

The toilets are in an extremely poor condition, and the BM wishes to undertake some refurbishment, and refit works to these toilets to bring them back into use and up to modern standards. This application follows an exchange of emails with London Borough of Camden Officers who confirmed that the proposed works require listed building consent as they are in an area of high significance.

The proposed description of development is:

*"Refurbishment and reconfiguration of the contractors' toilets in sector E of the British Museum".*

**Submission content**

This application has been submitted via the planning portal (ref. PP-13275409). The following forms the submission and supporting documents:

- Application and CIL forms;
- Drawing pack, prepared by Nex Architecture
- Design & Access and Heritage Statement, prepared by Nex Architecture;
- Drawing schedule.

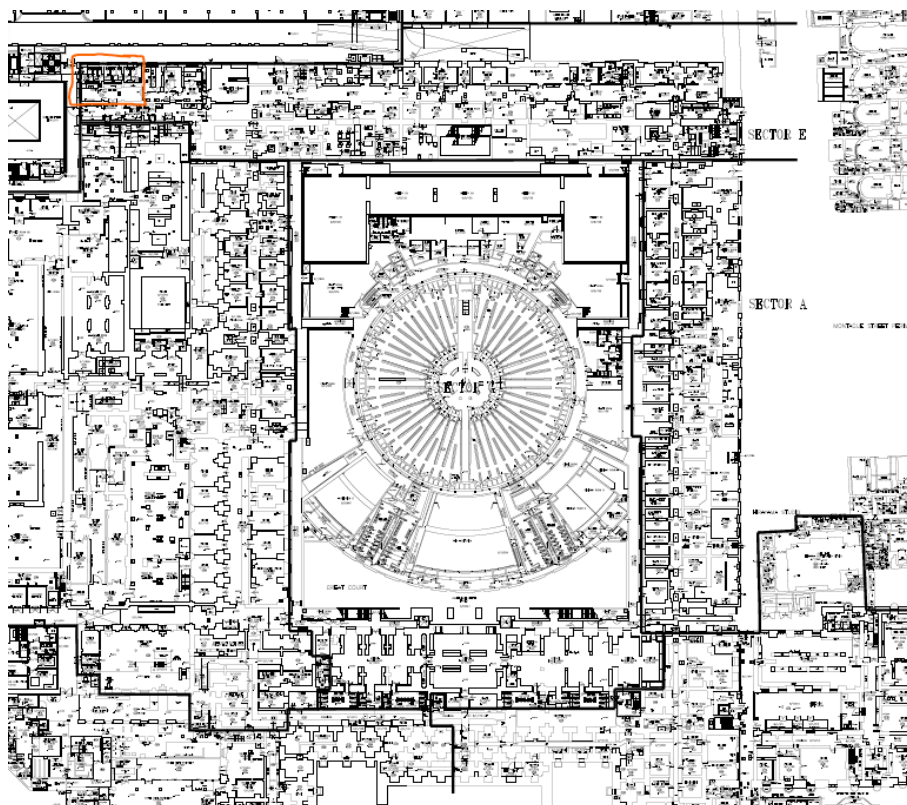
There is no fee for an application for listed building consent.

**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 the far north-western point of sector E of the British Museum, located at level 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 Strategic 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 emerging 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 fabric that is affected by the proposal is set out in the Heritage Statement prepared by Nex Architects. The area is of high significance as it was designed by Robert Smirke as part of the North-West Wing development in 1838-41 to provide additional accommodation for the department of Printed Books. However, the sanitaryware is generally of low quality and not up to modern standards of water use as much of it has fallen into a state of disrepair with cracks, stains and leaks.

## Planning History

The British Museum has a vast planning history, of relevance to this application the toilets were last used by contractors completing the WCEC project which finished in 2014.

## Proposal

The BM is proposing to undertake some refurbishment works to the contractors' toilets to bring them back into use and up to contemporary standards.

There is currently a male toilet with 5 no. toilet cubicles and 1 no. shower cubicle and a run of urinals and 5no. basin. The female toilet is smaller with 2no. toilet cubicles and 2no. basins. These toilets will be removed but the character jack arches and circular/arched windows, the existing proportions and the majority of the wall tiles will be retained.

**Sanitaryware** | The works include the removal of the existing toilet cubicles, toilets, cisterns, sinks, tables and counters and replacement with new modern fittings throughout. There will also be new benches and lockers. All fittings will be sympathetic to the heritage of the existing spaces.

**Flooring** | The existing floor finish is made up of tiled and linoleum floors which is worn and listing in places and the proposal is to replace it with a new resin floor covering over repaired screed.

**Walls** | Where currently plastered, the walls will be cleaned and replastered where needed before being painted. Tiled walls will be cleaned and regouted, retaining as many tiles as possible, with only cracked or damaged tiles replaced - like-for-like.

**Windows** | 12no. of cracked and mismatching windowpanes will be replaced with panes matching the most common obscured pattern.

**Lighting** | New lighting fittings will be introduced and cabling for light fittings and all other electronic services including fire alarms and smoke detectors which will be replaced with new cabling in a new steel conduit.

**Mechanical services** | This will be replaced in its entirety with a new hot water system and newly run cold water pipework. The new mechanical ventilation system will also provide extraction from each cubicle to the outside via the new grilles in the existing windows or mismatched glazed panes. A new hot water cylinder will also be installed in the adjacent contractors' kitchen.

**External changes** | There is a concrete threshold step to each doorway, it is proposed to remove this step to provide level access to the toilets and the non-original doors will be replaced with new black painted timber doors.

### 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.

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 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 Museum is a Grade I listed building of international significance, which sits in the Bloomsbury Conservation Area. Its heritage interest and significance are summarised above and identified in more detail in the Museum's CMP, which has informed the proposed works that are the subject of this application. The proposed works are essential to bring the contractors' toilet back into use which will meet modern day standards and comfortable facilities for users. The conservation guidance notes that the area is of high significance. This relates to the main structural walls. The internal toilet cubicles, while shown on the plan, are not given any significance as they are modern insertions.

The proposed works will retain the character of the space while bringing it up to modern standards. The proposed new lighting will use LED fixtures, new resilient finishes to improve functionality and energy efficiency, in compliance with LP policy GG6. Most of the works will replace non-original toilet infrastructure, not impacting any historic fabric. The existing wall linings are a mix of painted plaster over brickwork and white tiles over brickwork. The tiles are in a varied condition with wall plugs fixed through in some areas. The proposal will predominantly leave tiles in place, repair where possible and replace others like for like. Plaster and paint work will be repaired and repainted. Some new tiles may be added behind sinks and shower areas but these are not considered to impact the historic fabric. The submitted HIA concludes that the proposed works will have a positive impact and overall will result in the lowest end of the scale of 'less than substantial harm' against the NPPF paragraph 208, which is greatly outweighed by the benefits of the scheme. The proposed works will have substantial benefit by bringing the spaces back into use, removing non original and patch work of services that detracts from the spaces. In addition, the removal of the step into the toilets will provide level access for all which complies with LP policy D5.

Overall, the works are not considered to impact the highly significant fabric found in this location, instead they are focused on non-original insertions. They will improve the aesthetic and usability of the space and not harm the architectural or historic interest of the listed building. This proposal is, therefore, also in accordance with the NPPF, LBC policies D1, D2, C1, C5 and CC1, as well as LP policies HC1 and GG6.

## **Conclusion**

The proposals have been carefully designed to ensure they are sympathetic to and enhance the architecture of the listed building. The proposals fully meet the requirements of the relevant London Plan and LBC Policies. The proposals are considered to deliver heritage gains alongside public benefits. The proposal will meet the objectives of Policies D1 and D2 and thus continue to enhance its status and significance. Overall, the proposal will support BM's function and thus enhances its international important status.

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 3-5 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](mailto:melanie@theplanninglab.com).

Yours faithfully,

**The Planning Lab**