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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-13367262

Dear Sir / Madam

**THE WHITE 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, 2, 3 and 4 of the White Wing 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 is a 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 White 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 southeast portion of the Museum’s estate fronting Montague Street directly south of 1A Montague Street. A Site Location Plan is submitted with this Application [ref. SW001-WWA-1000-X-DDG-A-1001 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 by the applicant in preparing the application.

The White Wing derives high significance from its historic interest as one of the earliest standalone extensions to the British Museum, evidencing its historical need for expansion during the late 1800s. It was built in 1881 and occupied by 1885 and lies on the former Principal Librarian’s residence as well as a former garden space to the Museum. The White Wing was purpose built as an exhibition space for the Prints and Drawings department of the British Medieval Antiquities as well as for storage of newspapers and manuscripts. The extension was designed by Sir John Taylor and funded by a bequest from William White, from which the White Wing derives further architectural and historic value.

The White Wing contains four different window types, they are all original dating from the 1881 construction, however they have had some interventions such as revised staircases, some later door openings, and the introduction of partitions to create offices.

The windows located at level 1 (basement) are of a more simplified design and more utilitarian, constructed from Crittall, which demonstrate the intended back of house nature of this part of the building (type B1). There are no public facing areas at basement level as existing and it is instead home to office and back of house functions in support of the Museum’s operations.

There has been little alteration in the original plan form of the White Wing at level 2 and the original detail and architectural features generally remain intact. The rooms within the eastern range of Level 2 contain the principal windows within the White Wing; these comprise large, oak framed windows with attractive fine detailing including decorative surrounds and architraves and shutters (type E1). The rooms within the eastern range include the Pre-History and Europe Students Room which contains a total of four type E1 windows – while the other rooms at this level only contain one or two type E1 windows. The Pre-History and Europe Students Room was originally the Slavonic Manuscripts Reading Room and appears to be entirely as originally built (with the exception of a later doorway) according to the CMP Gazetteer, meaning the windows located on this level date from 1881-1885. The grand character of the Pre-History and Europe Students Room, and the neighbouring rooms within the eastern range, is enhanced by the windows and lends status. We conclude that this is the most sensitive part of the White Wing to change due to its high significance and heritage value.

The windows located at level 03 of the White Wing form part of the mezzanine level which formed part of the original design for the White Wing. It comprises a cast iron structure and was intended to be used for storage of newspapers. Due to the utilitarian intended function of this space, the windows located at level 3 are of a lower status to those on levels 2 and 4. The mezzanine largely obscures the windows on this level as it is located at mid-level across the panes for safety reasons. The windows are timber sash windows (type F) and do not form part of any principal elevations or designated views of the building. They also look out over back of house service areas, and not public facing which further demonstrate their low significance.

Level 4 is largely unaltered since first constructed, with the exception of reversible partitions to form subdivided offices, and most original fittings are still retained. This is particularly true of the eastern range where the original floor plan is still clearly legible with the main alterations comprising the introduction of partitions in 1974 and the subdivision of the reading room in the 1990s. The windows are understood to be original and are large, decorative windows, finished in white (type C3 and E2); bearing resemblance to those on level 2 and considered to be significant historic features of the eastern range of level 4.

Overall, the White Wing has been well maintained and there has been minimal intervention into the original design and plan form of the building which has resulted in the retention of historic features of special interest and character. The windows do contribute to the overall appreciation and heritage value of the rooms; in particular those on level 2 and level 4. The windows in these areas have high significance and are sensitive to change.

Planning History

On the 17 July 2024, planning permission and listed building consent (2023/2020/L & 2023/1848/P) were granted 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. The client is moving forward with detailed design to discharge 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 and that 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 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 and only making interventions where absolutely necessary.

The Proposals

The acoustic surveys ensure that the works are targeted and only installed where necessary. The White Wing houses Support functions to the front of house visitor experience, including such departments as horology.

The proposals are for the installation of 29 units of internal secondary glazing within the White Wing at Levels 1, 2, 3, and 4. Some sundry works are required as part of the proposals and these are set out at page 11 of the Design Statement prepared by Wright and Wright Architects. The window types vary across the wing and can be categorised into six types for which bespoke secondary glazing has been designed.

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 to secure their removal following completion of the construction works:

“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 White 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. Some of the secondary glazing frames required for the White Wing are heavier duty as a result of the very large windows which are present – their scale is unusual, and the frames need to be able to support the significant weight of the glass required. SelectaGlaze are able to provide secondary glazing of this scale which meets the required noise mitigation levels, while other suppliers cannot.

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 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.

Overall, the principles of development are considered appropriate in scale and intervention to the White Wing for secondary glazing and cause no long-term harmful impacts to the historic fabric. The proposals are in line with Historic England Guidance on the installation of secondary glazing in listed buildings and Local Plan policy considerations.

Heritage Assessment

The installation of the secondary glazing provides a range of approaches reflecting the differences in the window types and their significance.

The windows on level 2 of the White Wing are the largest windows (type E1) which require secondary glazing during ECP construction, and the secondary glazing frames therefore need to be able to support the greatest weight of glazing. A thicker frame will be required as a result of their size which means that the appearance of the glazing will be more marked.

We note, however, that the sightlines will nevertheless be retained, and the new frames will not obscure the glazing. Furthermore, particular care has been taken to match the colour of the secondary glazing frames as closely as possible to the existing window frame finish and an anodized bronze finished is proposed for these windows to ensure they will be suitable for the environment and mitigate visual impact as far as possible. The anodized finish for secondary glazing of this scale is a service which is only provided by SelectaGlaze which forms part of the reason for selecting them as suppliers.

The installation process of the windows has been informed by the sensitivity of the historic fabric; it is proposed to place the frames on the flat face of the timber decorative reveal, avoiding the mouldings and having them recessed as deeply as possible, enabling the reveal to continue to be read. The shutters are proposed to be pinned back using SPAB and Historic England approved methodology which will allow for them to be re-opened following removal of the secondary glazing and causing no long-term harm to the shutters and appreciation of the windows and shutters as an ensemble.

On level 2 of the White Wing, the introduction of the glazing will inevitably affect the appreciation of the window proportions, joinery, and fine detailing which contribute to the character of the rooms and their significance. There is, therefore, a degree of impact on the significance of these windows (type E1) during the installation. However, it must also weigh in the planning balance assessment that this effect is on a temporary basis only. This method of repair has been carefully selected to mitigate long-term harmful effects and restore the special interest of the windows. The historic fabric will be made good through SPAB approved methods using hard, coloured wax to create an invisible repair following removal and allowing the shutters to be re-opened thus restoring the special interest of the windows, resulting in a net-neutral effect in the long-run when compared to the existing condition.

A similar approach to installation and removal is proposed at level 4 of the White Wing (type E2 and C3). The only difference is that the windows at level 4 will be finished in white to match the white paint reveals (further details pertaining to colour matching can be found in the Design Statement prepared by Wright and Wright which accompanies this Application).

The windows located within level 1 (basement) are more utilitarian in character given their environment and we do not consider that this application for secondary glazing will materially affect the way the basement windows (type B1) or room is experienced, nor will it affect its character as a back of house space. Similarly, the proposals relating to level 3 which comprise the installation of secondary glazing to the modern mezzanine timber sash windows (type F). The window types in these locations are utilitarian in nature and intended for back of house functions, furthermore they have across the service areas of the Museum; further reiterating their functional, back of house appearance. As a result, these Proposals will not materially affect the significance or appreciation of the internal spaces. We therefore identify no harm from the installation of the secondary glazing at level 1 or in relation to the mezzanine windows on level 2 or level 3.

Overall, we consider that the proposals will only give rise to a temporary harmful effect on the appreciation of the proportions and character of significant historic features at level 2 as the status windows located on this level contribute materially to the character and appreciation of the rooms. That impact arises in the context of the need to maintain the Museum as open to the public for the duration of the construction and is temporary in nature and this should be heavily weighed in the planning balance when this Application is being determined.

Furthermore, great care and consideration have been given to developing proposals which minimise impact on significant fabric and adopt an approach which is reversible, and we conclude that the Proposals have a net-neutral effect on the appreciation and character of the rooms and windows within the White Wing on a long-term basis following the removal of the windows.

The temporary nature of the works is material to our conclusions in respect of window types E1 and E2 where we consider the impact would not be acceptable on a permanent basis for the reasons we have cited above. Heritage values, however, are enduring, and in the proposed condition, following the removal of the secondary glazing and the repair of the affected windows, we 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.

In respect of certain windows, however, we find that the installation of the secondary glazing in the manner proposed would not materially affect character or special interest. On this basis we find no harm from the installation of secondary glazing to the following windows within the White Wing:

- Level 1 – Type B1; and
- Level 3 – Type F.

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 windows type.

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. 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.

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.