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Camden Council
Planning - Development Control,
Camden Council,
Camden Town Hall,
London,
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PP-13590873

Dear Sir/Madam

THE BRITISH MUSEUM, GREAT RUSSELL STREET, LONDON, WC1E 7JW
APPLICATION FOR LISTED BUILDING CONSENT FOR ALTERNATIVE EMERGENCY MEANS OF ESCAPE.

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:

“Internal alterations to the South Wing (Level 2) to provide an alternative means of escape route connected with the Energy Centre Programme”.

BACKGROUND

The works are proposed following the approval of the Museum’s Energy Centre Programme (ECP) planning applications, (references 2023/4903/L and 2023/4648/P). The ECP is the Museum’s proposal to switch to an all-electric energy system and is a major part of its strategy to achieve Net Zero Carbon. The two key infrastructure upgrades comprise the new South-west Energy Centre (SWEC) and the distribution of the site-wide services that will also be upgraded and a new incoming Substation.

The ECP development will be constructed while the Museum remains operational and open to the public.

This application forms part of a series of enabling works which are required to ensure that the Museum can operate effectively during the ECP construction period. The proposed works sought for approval in this application are required to maintain a viable means of escape from the south-west part of the Museum whilst SWEC is under construction, as the existing route will not be usable. A new, temporary means of escape is therefore required to allow public galleries and staff areas to remain open and functional throughout the construction period.

To facilitate the new route, interventions to the existing fabric will be required to comply with fire-safety regulations. The interventions are proposed to be temporary and to revert to the existing configuration following the completion of the ECP works.

The buildings within the British Museum site are Grade I listed buildings (listing number:1130404) and situated within the Bloomsbury Conservation Area.

PLANNING HISTORY

The extant SWEC planning permission and listed building consent were granted approval on the 16th October 2024 under refs. 2023/4903/L and 2023/4648/P. The applicant is now discharging conditions and obligations, with a view to starting on site in early 2025.

A site visit and pre-application meeting was held on the 6 November 2024 to discuss items relevant to this listed building consent application.

STATUTORY FRAMEWORK

Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 contains the statutory duties that apply to the grant of works to a listed building, requiring the decision maker to pay special regard to the desirability of avoiding harm to the special architectural or historic interest of a listed building.

In this usage, 'preserve' means 'to do no harm'.

THE DEVELOPMENT PLAN

The statutory development plan for the Site comprises the:

- London Plan (July 2021);
- Camden Local Plan (2017);

The relevant policies are set out within Chapter 3 on Design and Chapter 7 on Heritage and Culture of the London Plan (2021) in addition to Policies D1 Design and D2 Heritage contained within Chapter 7 of the Camden Local Plan (2017).

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'.

Further guidance has been provided through relevant SPDs including;

- Design (January 2021)

OTHER MATERIAL CONSIDERATIONS

The revised National Planning Policy Framework (the “NPPF”) was published on 20 December 2023 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The Framework sets out the Government’s approach to planning matters and is a material consideration in the determination of planning applications.

The National Planning Practice Guidance (2019), (the “NPPG”), published 21st July 2021 (and subsequent amendments) is also a material consideration and should be read in conjunction with the Framework.

The overarching approach of the NPPF is to promote sustainability which has three components, social, environmental and economic. The sections of particular relevance to the determination of this application are:

- Chapter 12 (Achieving well designed places); and
- Chapter 16 (Conserving and enhancing the historic environment).

DESCRIPTION OF THE PROPOSALS

Further investigations have been conducted by the architectural and the engineering design teams. The extent of the necessary revisions required to provide adequate means of escape is set out below and within the enclosed Design and Access Statement.

The proposals contained within this application will directly support the aims and objectives of the Energy Centre Programme (ECP) by ensuring the Museum can continue operating without the need for closure during construction and minimising the extent of disruption.

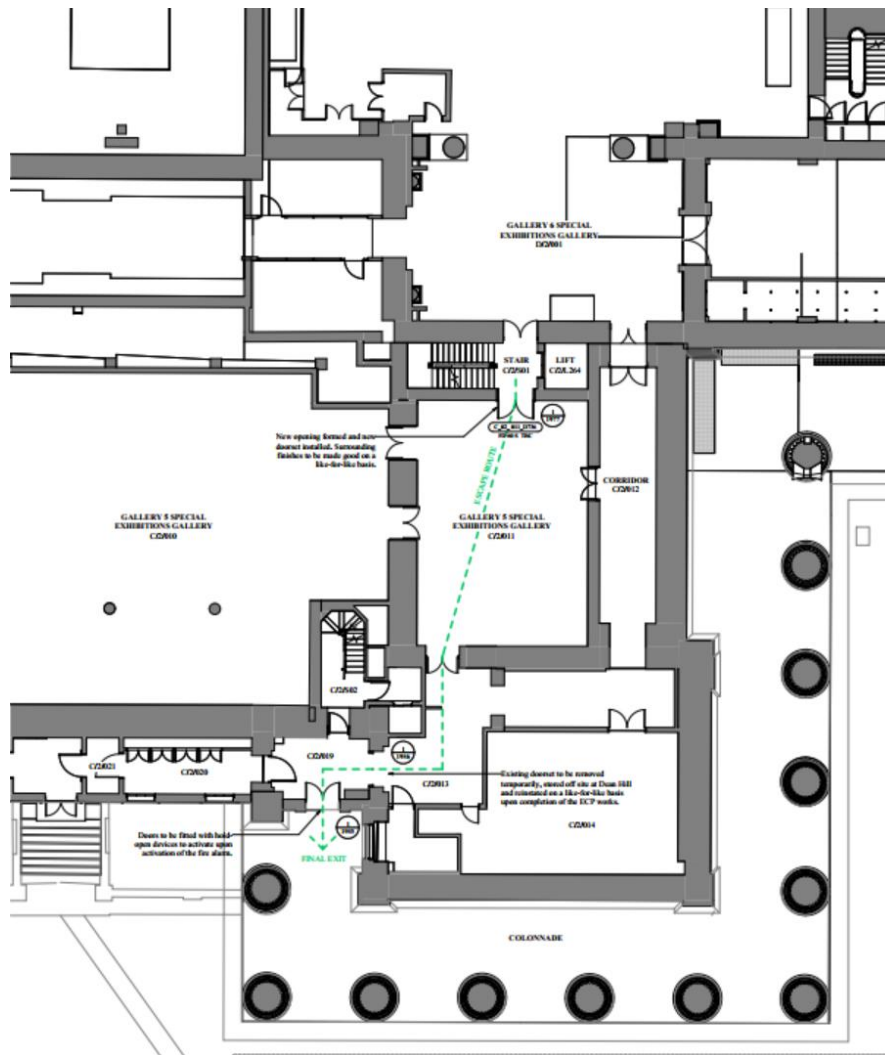


Figure 1. Floor Plan indicating the location of the Proposed means of escape route.

The areas affected by the means of escape works contained within these proposals is Level 2 of the South Wing, described in the DAS as:

The South Wing (Level 2):

This area is one of the oldest parts of the Museum and is generally assessed as being of very high significance within the CMP. It should be noted, however, that this part of the Museum has undergone significant alterations, most notably in the 1970s during the construction of the New Wing. Also, most interventions within this area are not to the highly significant public gallery spaces, but within back-of-house staff areas. The proposed alteration that is most publicly visible is to the external door leading onto the colonnade, facing onto the south forecourt. Alterations to this door, however, are limited and reversible.

The Design and Access Statement prepared by Wright & Wright sets out the detailed approach to the alterations to a total no. of three doors. This section treats each door in turn, outlining the specific alterations proposed.

The means of escape route proposed has been subject to careful consideration and the design team has considered all options.

Door 1: Stair (C/2/S01) to Gallery 5 (C/2011)

The formation of a new door opening between stair (C/2/S01) and Gallery 5 (C/2/011) to provide an alternative means of emergency escape from the New Wing stair for staff.

Gallery 5 (C/2/011) is currently in use as a collection store.

The door would be formed by demolishing an opening in the masonry wall between the two rooms, installing precast concrete lintels to span the new opening, installing a new timber fire doorset and linings, and making good on a like-for-like basis the finishes around the new door in both rooms.

The new door would be detailed and finished to match the existing twentieth century doors in Gallery 5, which are of a flat panel design with oak veneer finish leaves and frames. Upon completion of the ECP works, this door would be removed, the opening infilled with masonry and finishes made good on a like-for-like basis.

Door 2: Corridor (C/2/013) to Lobby (C/2/019)

The temporary removal of the double leaf doors between the corridor (C/2/013) and lobby (C/2/019) and their safe storage at the Museum's specialist Dean Hill facility for the duration of the ECP period and their reinstallation on the completion of works. This is to maintain a clear egress route, free from obstructions, for members of the public and staff escaping via the proposed alternative route. These doors would be reinstalled upon completion of the ECP works in accordance with a methodology to be secured by condition (see below).

This is to maintain a clear egress route, free from obstructions, for members of the public and staff escaping via the proposed alternative route. These doors would be reinstalled on a like-for-like basis upon completion of the ECP works.

The existing door frames and architraves will be maintained in situ.

Door 3: External door to colonnade

The proposal is to remove the existing modern door closer device and install an automatic door opening device on the internal face of both door leaves.

During normal operation, the door opening device would keep the doors securely closed, preventing unauthorised intrusion from the outside. The modern lockcase currently installed in the door would be replaced to make the locking compatible with the operation of the opening device. All historical ironmongery items, including door handles and hinges will be retained in situ.

Building Regulations require an infrared safety sensor to be installed at the top corner on the interior and exterior of each door leaf, to prevent finger trapping during the operation of the doors.

In addition, new ironmongery comprising an automatic opening device would be fitted to the upper architrave and head rails of the two door leaves internally, and infrared safety sensors fitted to the inside and outside upper corners of each door leaf. The manufacturer has confirmed that a bespoke RAL colour can be applied to match as closely in colour to the oak doors.

Upon completion of the ECP works, the alterations will be reversed and the doors returned to their current configuration. Finishes and decorations will be made good on a like-for-like basis, in accordance with guidance from SPAB, described in a later section.

HERITAGE IMPACT ASSESSMENT

The Conservation Management Plan (CMP), prepared by Purcell, provides a summary of the significance on a room by room basis. The proposed new routes will impact the South-West Wing, Level 02 throughout the course of the ECP construction.

Door 1: Stair (C/2/S01) to Gallery 5 (C/2011)

Introduction of a new opening between the landing of the New Wing east stair (C/2/S01) and Gallery 5 (C/2/011).

The Significance of the C/2/S01 New Wing East Stair is defined within the CMP as follows:

This staircase originally gave access from basement (Level 1) to ground floor (Level 2) and up to Level 5. There were connecting doors to the ground floor corridor, the Trustees' Meeting Room (C/2/011) and the room above (C/5/011 and C/5/015). There were west-facing windows at all levels. At Level 6, the staircase was floored across giving access to a water closet, and, above it, a further floor supporting a 'slate reservoir'.

This staircase was entirely gutted and remodelled in the 1970s with a new staircase and lift giving access to the new floor levels and continuing up to Level 6. The windows to the west were all filled in. The doors to the east and to the former Trustees' Room were also infilled.

The wall which is proposed to be altered in this location is recorded as dating from 1845–1865 and is in an area of very high heritage significance. This part of the Museum, however, underwent significant change during the construction of the New Wing in the 1970s, as described in the CMP gazetteer (extract included above).

The building envelope within which these rooms are located forms part of the second phase of development at the British Museum. Whilst there is a high associative value as high-status rooms for the use of the Museum Trustees, the original form has been substantially altered with the 1970s New Wing and the insertion of mezzanines. The stairwell onto which the opening is proposed to be formed is of no historic or architectural interest, forming part of the 1970s reordering.

The proposals would result in the removal of a small area of historic fabric within Gallery 5, resulting from the new opening introduced in this location. However, the siting and location of the new doorway is such that decorative elements which include the plasterwork on the ceiling and dentil cornice would be unaffected, and upon completion of the construction phase, the alteration could be reversed and the area made good on a like-for-like basis. Overall, therefore, in this scenario there would be no change to plan form and no change to the character of Gallery 5. Should the opening be retained, the qualities of the decorative detailing would continue to be appreciated. The impact arises in the context of facilitating the continued operation of the Museum and maintaining the south-west galleries as open to the public for the period of construction.

For these reasons, we consider there to be no material impact on the special interest of the Museum, the significance of which will be preserved.

Door 2: Corridor (C/2/013) to Lobby (C/2/019)

The Proposed Development seeks to temporarily remove the existing door which connects the Corridor at (C/2/013) to the adjacent Entrance Lobby (C/2/019).

The CMP describes the significance of these spaces as follows:

C/2/058, C/2/013, C/2/017, C/2/018, C/2/063: The formal entrance hall for the use of the Trustees was entered from a vestibule to the west which would have served as a draught lobby (C/2/019). It was carefully designed to be symmetrical and axial. On either side of the entrance doors would have been two windows, one to the south overlooking the colonnade and one to the north overlooking the garden north of the West Residence. In the centre of the east wall in C/2/013 was a chimneybreast and fireplace, with cupboards on either side, the northern cupboard doors being a pair of 'jib' doors giving access into the south-east room (C/2/014). To the south the window was blind internally.

The entrance door from the lobby on the west side has a semi-circular fanlight above the door impost. The doors are of oak, three main panels high with ogee moulding, and a flush beaded panel at door knob height. On the lobby side the doors are of the rebated fielded form associated with design of the doors in the ground floor exhibition galleries. The doors are hung on large cast iron hinges which are probably original. The knobs are of the cast brass rosette type. The doors to the Trustees' Room were of similar design, and had moulded architraves and a simplified cyma cornice over, now disappeared.

The doors are original and contain several decorative features, namely the panels and ironmongery attached. Their removal and storage within the Museum's specialist facility at Dean Hill would be carefully undertaken to ensure that these items are not damaged through dismantling or transit.

The proposed route is temporary, only required as a result of the construction works, and it is proposed that upon completion of the works the doors would be reinstated, and the character of the space would return to its existing condition.

We are however aware that the Museum will in the future be developing proposals for the refurbishment of the western galleries and at the time of writing, it is not clear how any such proposals may interact with the proposed means of escape applied for here. Accordingly, the Applicant proposes the following condition (or similar) be attached to any decision notice to secure the reinstatement of the doors in accordance with an approved methodology, noting that the doors need to open in the direction of escape. The Museum wishes to minimise any impact on historic fabric until such time that it becomes necessary,

"Within 6 months of the end of the ECP construction works and prior to the reinstallation works for door 2 Corridor (C/2/013) to Lobby (C/2/019) a methodology shall be submitted to the Local Planning Authority and approved in writing setting out details of the works for the rehanging of the door leaves. Their reinstatement shall only be carried out in accordance with the approved methodology."

Door 3: External door to colonnade

The South Colonnade comprises an original part of the Robert Smirke masterplan. Due to its external facing façade, it is a highly visible feature and a recognisable and distinct feature of the Museum. The doors to the South Colonnade are original and of high significance.

The proposed alterations are minor and include the removal of a modern door closer device which is to be replaced by an automatic door opening device to internal face of each door leaf. The devices will be installed on the upper architrave and head rails of the two doors and infrared safety sensors fitted to the inside and outside upper corners as indicated in the proposed drawing ref. SW001-WWA-1020-C-DDG-A-1985.

The finish of the automatic opening devices will match as closely as possible, the colour of the oak doors. The devices will be visible internally only, minimising the visual impact on the external appearance of the south colonnade. The externally

fitted infrared sensors are discreet and will not materially affect the appearance of the door as seen from the south colonnade or forecourt (see DAS page 40).

There would be no impact to the historic ironmongery on the door (hinges and handles), which would be retained in situ.

CONCLUSION

We have considered the potential impacts of the amendments to the consented scheme as part of this application and have submitted supporting information which demonstrates that the changes would not give rise to negative impacts on the significance of the listed building.

The proposed means of escape has been options tested and discussed with LBC at a pre-application meeting with the council held on 9 October 2024. The Proposed Development presents the least amount of disruption to the existing building fabric, whilst simultaneously providing the most direct escape route onto the colonnade.

These changes are small and necessary for the safety of museum visitors and employees and compliant with Policies D1 Design, D2 Heritage contained within Chapter 7 of the Local Development Plan.

We therefore conclude that the alterations sought as part of the Proposed Development are minor in nature and present the least impactful solution with regards to impacts on the historic fabric.

We anticipate that the appropriate making good, if required, can be secured through condition. The reinstatement of the wall at Door 1, original Door 2 and making good of Door 3 can ensure that the appearance of the affected spaces will return to an appropriate condition.

APPLICATION DOCUMENTS

To assist in the determination of this application, the following application documents accompany this application for planning permission and listed building consent:

- Application form for Listed Building Consent, prepared by Montagu Evans LLP;
- Covering Letter including Heritage Statement (i.e. this letter), prepared by Montagu Evans LLP;
- Design and Access Statement, prepared by Wright and Wright;
- Proposed drawings prepared by Wright and Wright; and
- Drawing schedule prepared by Wright and Wright.

ADMINISTRATIVE MATTERS

The application has been submitted via the Planning Portal under reference **PP-13590873**.

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 Honor Munro-Hall (07823 800 731/ honor.munro-hall@montagu-evans.co.uk) in the first instance.



Yours sincerely,

Montagu Evans

MONTAGU EVANS LLP