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Camden Council
Planning - Development Control,
Camden Council,
Camden Town Hall,
London,
WC1H 8ND
planning@camden.gov.uk

PP-13648416

Dear Sir/Madam

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

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 and external alterations to the North Wing (Level 1) to provide an alternative means of escape route connected with the Energy Centre Programme”.

BACKGROUND

The works are proposed following the approval of Museum’s Energy Centre Programme (ECP) planning applications, (references 2023/1848/P, 2023/2020/L, 2023/4648 and 2023/4903/L). 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 key infrastructure upgrades comprise the new South West Energy Centre (SWEC) and the East Road Building (ERB), and a new incoming Substation. The site-wide distribution services will also be upgraded.

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 safe means of escape from the north-east part of the Museum whilst the ERB is under construction, as the construction period requires the closure of several existing emergency exits in the north-east part of the Museum estate. To maintain the safe function of this area, alternative means of escape are required which avoid the ERB construction site and discharge instead onto the internal north road. The alternative route enables the public galleries to remain operational and open to the public.

To facilitate the new route, interventions to the existing fabric are required to comply with fire-safety regulations. The interventions are proposed to be permanent and will be retained as an improvement means of escape 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 ERB planning permission and listed building consent were granted approval on the 17 July 2024 under refs 2023/1848/P and 2023/2020L. The applicant has discharged pre-commencement conditions and obligations.

A pre-application meeting was held on the 9th October 2024 to discuss items relevant to this application with respect to alterations to the means of escape to accommodate the construction works.

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 12 December 2024 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

The proposed interventions are informed by fire engineering investigations. 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.

A summary of the proposed changes is set out below. The works relating to 1) and 2) are also shown on the plan at Figure 1.

- 1) The widening of the existing door between corridor E/1/011 to lobby E/1/015, including the removal of the existing door frame and adjacent timber cupboard, structural alterations to the brick masonry wall to form a wider doorway, and making good of finishes on a like-for-like basis.
- 2) The formation of 1 no. new external door in place of four existing windows in toilets E/1/095 and E/1/096. This will involve the demolition of modern toilet partition walls, strip-out of toilet fittings and finishes, diversion of mechanical, electrical and plumbing services, formation of 1 no. new door opening in the brick masonry external wall, installation of 1 no. new external doorset, and new finishes to walls, floors and ceilings, made good on a like-for-like basis.

The area affected by these proposals is the North Wing (Level 1). The North Wing itself is one of the oldest parts of the Museum, assessed within the CMP as largely of ‘very high’ significance, albeit has seen considerable change and modern intervention.

With regard to the basement corridors (part of which will be affected by 1. above) the CMP notes that ‘*where it survives, the vaulted structure and cellular configuration are significant original features*’.

The east WCs, (to which the proposals under 2. relate), are accommodated within a small 19th century extension which did not form part of the original Smirke design, and which at basement level was converted to toilets in the 20th century. The present toilets, fixtures and fitting are modern and there is no fabric of significance within this space. The CMP identifies

this area as being of 'low significance'. The historic development of this part of the Museum is documented in the DAS at page 21.

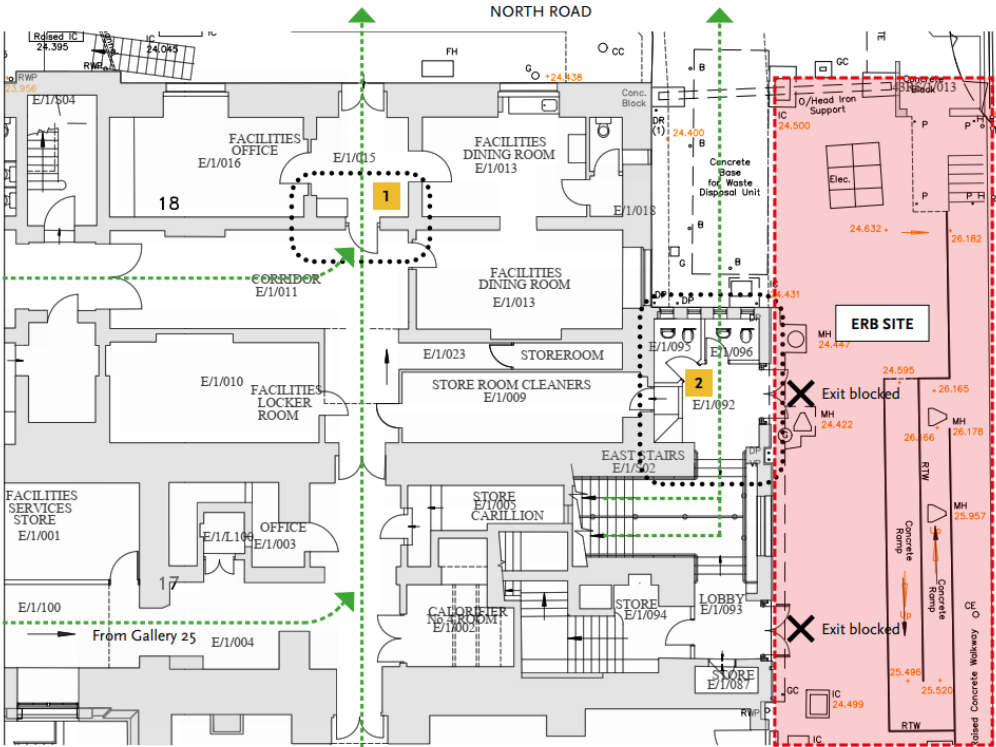


Figure 1. The location of the proposed means of escape routes



Figure 2. Extract from the CMP significance plans. Purple is 'very high' significance; light blue is 'low significance'. Areas of alteration are marked with an asterisk.

HERITAGE IMPACT ASSESSMENT

Area 1

The proposals for the widening of the existing doorway to enable safe access will result in the loss of historic fabric and will change the character of this doorway from a round-headed arch to rectangular opening. This area forms part of the original vaulted basement corridors which were part of the Smirke design and recognised as of high significance within the CMP. A non-original cupboard (part of which sits in front of the door opening) is also proposed to be removed.

As demonstrated within the DAS, the proposed works have been informed by options analysis by fire specialists. They represent the minimum intervention necessary to achieve the continuation of critical operations and functionality of the Museum.

The works affect a small portion of the basement corridor: the doorway is part of the extensive vaulted corridor system extending beneath the Museum, within which the same round-head arches are a characteristic feature. Additionally, this is a back of house area which has never formed part of the public gallery space.

Notwithstanding, the loss of original fabric which alters the appearance of the doorway will cause a degree of harm to significance. We consider that harm to be less than substantial in the terms of the NPPF and at the lower end of the scale when considered in the context of the significance of the Grade I listed building.

The impact arises in the context of the long-term improvement of the fire escape routes to meet life safety regulations, as well as the requirement for the alternative escape route in the construction period. The effect is permanent, and the design of the new doorway has been carefully considered to support the existing vault and to make good the affected fabric in an appropriate manner. The reversal of the intervention, we understand, would lead to greater impact on historic fabric as the concrete lintel will be cast in situ, and so the new doorway is to be retained on a permanent basis.

The limited harm we identify results from operational need and risk prevention and should be weighed against the benefits of the proposals. One such benefit arising directly from the proposals is keeping the public galleries and other parts of the Museum open to the public through the delivery of a major capital project.

Area 2

The affected fabric in this area is of no especial historic or architectural interest. It is identified as of low significance within the CMP, forming part of a later 19th century extension which was not part of the original Smirke design.

Furthermore, the fixtures and fittings are wholly modern, comprising back of house WCs.

No internal features of interest are proposed to be altered – the design has been refined since the pre-application meeting so as to avoid the need for works to the east stair.

The openings required to facilitate the new route affect a secondary elevation which has no visual relationship with public areas and which is of no particular architectural quality.

For this reason, we identify no harm from this element of the proposals, the requirement for which arises in the same context of critical operational requirements as for Area 1 above.

CONCLUSION

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 in line with life safety requirements.

The changes are small and necessary for the safety of museum visitors and employees, and we 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. The less than substantial harm arising from the loss of historic fabric, which attracts great weight, is outweighed by the life safety benefits for staff and visitors provided through the alternative escape routes and the continued operation of the Museum, enabling the public galleries to remain open during the construction period.

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 Planning Permission and 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-13648416**

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. 07818012 421 / 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 LLP