

PD13794/RA/HMH

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20 February 2025

**Camden Council**  
**Planning - Development Control,**  
**Camden Council,**  
**Camden Town Hall,**  
**London,**  
**WC1H 8ND**  
[planning@camden.gov.uk](mailto:planning@camden.gov.uk)

**PP-13764015**

Dear Sir/Madam

**THE BRITISH MUSEUM, GREAT RUSSELL STREET, LONDON, WC1E 7JW**

**S19 APPLICATION TO VARY CONDITION 4 RELATING TO LISTED BUILDING CONSENT  
REFERENCE: 2024/5571/L**

On behalf of our Client, the Trustees of the British Museum ("the Museum" / "the Applicant"), please find enclosed a S19 application to vary the wording of Condition 4 attached to Listed Building Consent referenced 2024/5571/L ("the Application") at The British Museum, Great Russell Street, London, WC1B 3DG ("the Site").

**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 Consented Development 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 temporary means of escape routes to the South Wing were granted consent on the 28<sup>th</sup> January 2025, under listed building consent reference 2024/5571/L ("the Consented Development").

The description of development for the Consented 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".*

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Montagu Evans LLP is a limited liability partnership registered in England and Wales with registered number OC312072. Registered office 5 Bolton Street London W1J 8BA. A list of members' names is available at the above address.

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

## **THE AMENDMENTS**

The Decision Notice attached to the Consented Development issued on the 28<sup>th</sup> January 2025, comprised Condition 4 relating to the removal of the temporary works. The specific wording of that condition is set out below:

4. *The works hereby approved are for a temporary period only and shall be removed within 6 months of the British Museum's Energy Centre Programme noisy works period ending (unless otherwise agreed in advance in writing by the local planning authority), for which they are required.*

*Reason: The type of works are not such as the local planning authority is prepared to approve, other than in exceptional circumstances and for the limited period required, in view of their appearance and their impact on the special interest of the listed building. The permanent retention of the works would be contrary to the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.*

The Consented Development does not relate to the noisy works period which forms part of the trigger for the removal of the alternative means of escape routes.

The works are however required throughout the implementation of the SWEC permission referenced 2023/4903/L and 2023/4648/P.

This has been raised with Camden Officers in advance of submitting this application, via an exchange of emails (dated 7<sup>th</sup> February 2025). It has been agreed that the proposed alternative wording for condition 4 would be appropriate and relevant to the Consented Development. The revised wording is set out below:

4. *The works hereby approved are for a temporary period only and shall be removed within 6 months from practical completion of the SWEC permission for which they are required, consented under listed building consent reference 2023/4903/L (unless otherwise agreed in advance in writing by the local planning authority).*

*Reason: The type of works are not such as the local planning authority is prepared to approve, other than in exceptional circumstances and for the limited period required, in view of their appearance and their impact on the special interest of the listed building. The permanent retention of the works would be contrary to the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.*

## **PLANNING HISTORY**

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

The Consented Development reference 2024/5571/L comprises part of these enabling works.

Planning Application and associated Listed Building Consent Application ref 2025/0102/P & 2025/0146/L, for the Amended Means of Escape applications to North Wing are also currently being determined. The anticipated date for the determination of these applications is the week commencing the 17<sup>th</sup> February 2025.

## **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.

Section 19 of the P(LB & CA) Act 1990 allows for applications to vary conditions.

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).

## **OTHER MATERIAL CONSIDERATIONS**

The revised National Planning Policy Framework (the "NPPF") was published 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 21<sup>st</sup> 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).

Camden is currently reviewing their Local Plan. The Regulation 18 draft new Local Plan (January 2024) was consulted on between January and March 2024. The Council is currently reviewing consultation responses, and an updated Regulation 19 Draft is anticipated to be published in Spring 2025. Given the early stage of the review process limited weight is accorded to the policies contained within that document. The sections relevant to the proposals are contained within Chapter 12- Design and Heritage.

## **CONCLUSION**

We have considered the potential impacts of the amendments to the consented scheme as part of this application. The proposed changes to the wording of Condition 4 would not give rise to negative impacts on the significance of the listed building.

These changes are small and necessary and are relevant to the works proposed as part of the Consented Development. 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.

The appropriate making good, would be secured through condition 3 and 5 of the Decision Notice for the Consented Development which will 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;

#### **ADMINISTRATIVE MATTERS**

The application has been submitted via the Planning Portal under reference **PP-13764015**.

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](mailto:rosie.adamson@montagu-evans.co.uk)), Graham Allison (Tel. 020 7312 7421 / [graham.allison@montagu-evans.co.uk](mailto:graham.allison@montagu-evans.co.uk)) or Honor Munro-Hall (07823 800 731/ [honor.munro-hall@montagu-evans.co.uk](mailto:honor.munro-hall@montagu-evans.co.uk)) in the first instance.

Yours sincerely,



**MONTAGU EVANS LLP**