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F.A.O. Elaine Quigley
Development Management
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London
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Planning Portal Reference **PP-13675528**

Dear Elaine,

**1A MONTAGUE STREET, LONDON WC1B 5BP
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 (AS AMENDED)
APPLICATION FOR PLANNING PERMISSION AND LISTED BUILDING CONSENT**

On behalf of our client, Trustees of the British Museum ("the Applicant" / "the Museum"), please find enclosed an application ("the / this Application") for planning permission and listed building consent relating to 1A Montague Street, London, WC1B 5BP ("the Site" / "the Building").

This Application seeks the following development proposals:

"Reinstatement of door to Montague Street façade, creation of opening to southern boundary wall and new gates to the within the curtilage of the building."

This letter acts as a joint **Planning and Heritage Statement**.

PLANNING HISTORY

The Site has a recent planning history. Internal and external works were permitted to the Building through planning permission and listed building consent refs. 2017/4112/P and 2017/4724/L, which were subject to an amendment through subsequent permissions. Those works have been implemented and completed.

The Architectural Association now occupies the Building following the grant of planning permission for a change of use from office to education (ref. 2021/5586/P).

PROPOSALS

The proposed alternative access for UKPN involves reopening the blocked doorway and creating a small entrance through the garden party wall to allow access to the UKPN Switch Room. A new gate is proposed to the rear of the door to ensure only access to the adjoining substation is provided. Partial demolition of the boundary wall is proposed to provide access to the new substation.

The new door to the single-storey projecting façade element to the south of the building would be timber to match that which previously existed as illustrated from historical material.

The Application is proposed alongside a forthcoming NMA application to planning permission ref. 2023/4648/P, which was granted by London Borough of Camden ("LBC") on 16 October 2024 for the following ("Consented Scheme"):

"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 Consented Scheme provided for a new substation immediately to the south of 1A Montague Street but within the boundary of the Museum. Through detailed design, UKPN has confirmed that they need unrestricted access to the substation 24/7. For security purposes, unfettered access to the Museum site by a third party on an unrestricted basis is unacceptable to the Museum as it represents a risk to the objects in the Museum's collection.

However, the substation's permitted location on the boundary with 1A Montague Street affords the option of providing access to the substation on a 24/7 basis without passing through the Museum site.

This Application seeks to secure permission for that alternative access for those aspects which fall outside of the redline of the permission ref. 2023/4648/P. Those aspects of the altered design approach fall inside of the redline of permission ref. 2023/4648/P are sought through the associated NMA application.

STATEMENT OF SIGNIFICANCE

Significance

1A Montague Street is a grade II statutorily listed building on the west side of Montague Street, which was combined internally with 1 Montague Street as part of a 1980s package of works to adapt the properties for use as ancillary space for the British Museum. The two buildings were part of two separate phases of construction and are covered by two separate entries on the statutory list ('1-11 Montague Street' (No. 1) and 'Number 30 and attached railings and lamps' (No. 1A). 1A formerly incorporated a banking hall to the rear, which has been reused as the Hirayama Conservation Studio.

Architectural interest

The principal elevations of the property retains classical proportions and detailing which contributes to the uniform appearance of the terraced development in the area. It retains its original brickwork, fenestration arrangement, entrances at ground floor and cast iron railings at ground level with balconies to the upper floors. It is of architectural and artistic interest for its appearance as part of the range of early 19th century terraced properties on the west side of Montague Street. No. 1a retains its original cast iron railings with urn finials and has an attractive façade which complements the adjoining terrace at nos. 1-11.

The property has an adjoining blocked doorway to the south, which was formerly the entrance to the waiting room and banking hall at the rear. Historically in appearance

The doorway is freestanding and there is an open area behind, currently unused except for services.



Left to right: historic photograph of the door in situ; 1889 illustration of the Bloomsbury Savings Bank; the blocked door as existing.

Historic Interest

Beyond its historic interest as an early 19th century terraced building constructed as part of the main phases of speculative development in Bloomsbury, 1a Montague Street is of some local historical interest for its association with the former Bloomsbury Savings Bank. The house is no longer associated with the former banking hall, which is part of the British Museum complex. The property's association with the British Museum makes some contribution to its historical interest, as an institution of international renown.

Contribution to the Bloomsbury Conservation Area

The property lies within the Bloomsbury Conservation Area ("CA") which as a whole derives its special interest from its surviving early street pattern and dominant architectural form of the townhouse. Later built form is varied, with institutional and landmark buildings including the British Museum. The historic presence of these establishments has contributed to the cultural interest of the area.

1a Montague Street is within a sub-area identified in the Appraisal (2011) as the Bloomsbury Square Area. The Appraisal describes the terrace on the west side of Montague Street as having "its own uniform townscape with a high sense of enclosure created by the 1800s terraces on its east and west sides, all of which are listed grade II... the strong visual consistency derives from the repeated identical frontages."

The front elevation of the building makes a positive contribution to the character and appearance of the Conservation Area and contributes to the legible, historic layout of Montague Street.

While the doorcase conveys part of the historic interest of the building and is of some interest for its architectural detailing, the loss of the former savings bank door itself has diminished the contribution the building makes to the street scene. The existing blank face presents an opportunity for enhancement.

The rear yard space, whilst within the Conservation Area, is not visible in any public views, and does not make a meaningful contribution to the character or appearance of the CA.



Left to right: the rear of the blocked doorway; the party wall with the ISS site; view along the party wall towards the blocked doorway.

LEGISLATION AND POLICY

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 indicates otherwise. The relevant Statutory Development Plan for this Site is outlined below.

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) 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 2024. The NPPF sets out the Government’s economic, environmental 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. 207, 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. 212, 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. 215 (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) (para. 212, NPPF);
- Any harm to the significance of a designated heritage asset should require ‘clear and convincing justification’: para. 213, 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. 215, 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 assets, 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 has 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 draft Local Plan was published in January 2024. The Council is reviewing the responses and will publish an updated version of the Local Plan for further consultation in Spring 2025.

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.

PLANNING AND HERITAGE ASSESSMENT

The proposals better reveal former patterns of use and access, and the new door has been carefully designed to enhance the appearance of 1A Montague Street and the contribution the property makes to the street scene and the conservation area. The design of the door – a painted 8 panel arrangement with a solid timber over panel - has been informed by examining the historic photograph and illustration combined with relevant precedent. It is typical of the period and similar to several doors on Montague Street, and is therefore appropriate to its context, reflecting insofar as possible the historic condition.

The secondary gate behind the portico, formed from a PPC metal grill, will not be visible from the street and will not affect the appearance of the principal elevation, from which the architectural interest of the building is best appreciated. The opening and doorway formed within the garden party wall into the ISS building itself is likewise discreetly positioned behind the portico and will not be seen from public vantage points. The proposed size is the minimum required, and the railings to the top of the wall will be unaffected.

Overall, we consider any impact on significance from the loss of this small portion of the garden wall would be negligible (very low, less than substantial harm) and decisively outweighed by the benefit of reinstating the former use of this historic entrance and the improvement to the appearance of the building.

Overall, we identify an enhancement to the significance of the Grade II listed building. For the same reason, we also identify a minor enhancement to the character and appearance of this part of the CA, and the setting of surrounding listed buildings.

APPLICATION MATERIAL

The Application comprises the following documentation:

- Completed Application Form (with Ownership Certificates) prepared by Montagu Evans;
- This Covering Letter (incl. Planning and Heritage Statement) prepared by Montagu Evans;
- Community Infrastructure Levy Form prepared by Montagu Evans;
- Site Location Plan prepared on Planning Portal;
- Existing Site Plan (1:500) prepared by Wright & Wright;
- Proposed Site Plan (1:500) prepared by Wright & Wright;
- Drawing Register prepared by Wright & Wright;
- Application Drawing (existing, demolition and proposed) prepared by Wright & Wright;
- Design Statement prepared by Wright & Wright; and
- ISS Architectural Specification prepared by Wright & Wright.

APPLICATION PROCEDURE

This Application has been submitted on the Planning Portal under reference **PP-13675528**.

The Application fee has been calculated in accordance with the Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment) (England) 2012 (as amended). The fee amounting of £293.00 (plus £70.00 service charge) will be paid via the Planning Portal upon submission.

We trust that the enclosed information is sufficient for you to register and validate the Application. In the meantime, should any further clarification, information or assistance be required, please do not hesitate to contact Graham Allison (graham.allison@montagu-evans.co.uk), Eleanor Mazzon (eleanor.mazzon@montagu-evans.co.uk), and Alex Nesti (alex.nesti@montagu-evans.co.uk) in the first instance.

Yours sincerely



MONTAGU EVANS LLP

Enc.