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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 and Catherine Bond

Planning Portal ref. PP-13897728

Dear Elaine and Catherine,

**THE BRITISH MUSEUM, GREAT RUSSELL STREET, LONDON, WC1B 3DG
THE TOWN 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 Lycian Building within The British Museum, Great Russell Street, London, WC1B 3DG ("the Site").

Listed Building Consent is sought for the following development proposals ("the Proposed Development" / "Proposals"):

"Erection of 3no. temporary scaffoldings to facilitate the removal and erection of pipework and other services on the Lycian and New Wing buildings as consented under planning ref. 2023/4903/L".

This Letter acts as a **Heritage Statement**.

SITE BACKGROUND

The Site is within the British Museum estate, in the jurisdiction of the London Borough of Camden ("LB Camden"). 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 southwest portion of the Museum's estate.

The British Museum is a Grade I listed building occupying a street block within the Bloomsbury Conservation Area.

The Site has an extensive planning history which is available on LB Camden's online planning register. The most recent relevant application relates to the development of the South West Energy Centre ('SWEC') building.

PROPOSED DEVELOPMENT

Under application ref. 2023/4903/L consent was granted for the removal of all existing pipework on the west elevation of the Lycian Building and the erection of new pipework on the north elevation of the Lycian Building. Consent was also granted for the removal of a flue and external services on the north elevation of the New Wing.

Consent is now sought for the erection of temporary scaffolding in three locations to facilitate these works.

Griffin Scaffolding Ltd have provided elevations, sections and plans for the design and location of the scaffolding. The applicant has undertaken scaffold tie pull out tests in 5no. locations to determine the scaffold design and the results of these test are enclosed with this application.

LEGISLATION AND POLICY

Heritage Considerations

Planning (Listed Buildings and Conservation Areas) Act 1990 provides the legislation that is used to assess the impact of proposals on listed buildings and conservation areas. The following sections of the 1990 Act set out the duties on the decision maker in this case:

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A list of members' names is available at the above address.

- Section 16(2): In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State 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.
- Section 66 (1): When determining applications, the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting of any features of special architectural or historic interest which it possesses; and
- Section 72 (1): With respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. Various court judgements have confirmed the considerable importance and weight that should be attached to the desirability of preserving the special interest of listed buildings and character and appearance of conservation areas. The meaning of 'preservation' in this context is the avoidance of harm.

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Planning Considerations

The Town and Country Planning Act 1990 (as amended) ('the Act') requires development, as defined by Section 55 of the Act, to have obtained planning permission prior to commencement. Upon submission of the planning application, the Council must consider the policies in the statutory Development Plan and assess the proposal against them. This is a legal requirement set out in the Planning and Compulsory Purchase Act 2004. Section 38(6) states as follows:

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

In this case the Development Plan comprises:

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

In addition to the above, the Mayor of London and LB Camden have a number of adopted and emerging supplementary planning documents which provide supporting guidance to the application of the development plan policies. Of note is the Bloomsbury Conservation Area Appraisal and Management Strategy in April 2011.

The National Planning Policy Framework (December 2024) and National Planning Practice Guidance are also material considerations in the determination of any planning application.

Emerging Policy

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 draft Local Plan was published 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 the NPPF, the Draft Local Plan can only be afforded very limited weight given that it has not reached an advanced stage of preparation.

Site Designations

The Site is subject to the following designations:

- Grade I listed building;
- Bloomsbury Conservation Area;
- Central London Area; and
- Tier II London Suburbs Archaeological Priority Area.

Historic England listed The British Museum on 24 October 1951 under list entry number 1130404. The listing description reads as follows:

TQ3081NW GREAT RUSSELL STREET 798-1/100/697 (North side) 24/10/51 The British Museum

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Museum. 1823-47. By Sir Robert Smirke with later additions. Portland stone. Planned as a big quadrangle with open courtyard extending north from Montague House (the original museum, demolished c1840). 2 main storeys in Greek Revival style. Built in stages. East Wing 1823-26: built to house George IV's library and Angerstein pictures (later basis of National Gallery). An early use of iron beams clad in concrete by engineer John Rastrick. Fine Grecian detail to interior with scagliola walls. West Wing 1831-4: built to house antiquities. Redecorated to Smirke's original colour scheme 1980. North Wing 1833-8: built to house antiquities. South Range 1842-7: built as the principal facade following the demolition of Montague House. 7-bay centre linked to projecting wings. Ionic octastyle portico with sculptured pediment projecting from a massive colonnade running around the wings. Ionic order from the temple of Athene Polias, Priene. Pediment sculpture depicts the "Progress of Civilisation" by Westmacott. Fine interior with grand central staircase. Round Reading Room 1852-7: by Sydney Smirke. Erected to fill the open quadrangle, with domed cast-iron roof. HISTORICAL NOTE: the museum expanded north during the C19, the last main addition being the King Edward VII Gallery (qv), 1914, facing Montague Place. Some of the galleries were damaged during World War II and have been remodelled for display purposes.

Listing NGR: TQ3005981712

HERITAGE ASSESSMENT

Significance of the Lycian Building

The Lycian Building forms part of Robert Smirke's early development plans for the Museum and opened to the public in 1847. The block as seen today is the result of many phases of development over the 19th and 20th centuries.

Originally, it comprised a triple-height space with pitched roof and coffered plaster ceiling to the gallery space below. In 1892 the pitched roof was removed, and the walls heightened to match the height of the adjacent West Wing upper floor galleries to provide a new gallery and offices for the Department of Coins and Medals (now known as Level 6). The new floor was lit by triple windows echoing those of the Lycian Gallery below and it is likely that it was also top lit by a rooflight.

The upper storey was gutted by WWII bombing, although the external envelope broadly survived (**Appendix 1 - Figures 1.1 and 1.2**). The gallery underwent reconstruction in the 1950s, with a mezzanine floor added (Level 6A) and two additional windows formed at the west end of the block to light the new mezzanine.

The ground floor gallery was itself comprehensively refurbished between 1961-81, and another mezzanine was inserted in the 1980s to create the Level 5 spaces.

Overall, therefore, the character of the interior spaces is materially altered from the 19th century intention of a triple-height gallery. The spaces are now artificially lit and have a character which reflects their 20th century remodelling. The very high significance of the wing accordingly lies predominately in its historic value and plan form as part of the Smirke masterplan (see **Appendix 2 – Figure 2.1**). The external fabric likewise has architectural interest that reflects its historic development.

The primary elevation to the south is marked by its ashlar facing, which formerly would have been seen above the southern forecourt and Great Russell Street prior to the construction of the New Wing in the 1970s. The areas affected by this application comprise the north and west elevations which are noted as stock-brick faced façades with stone string courses denoting storey heights. The west elevation displays less architectural detailing than the north elevation, with a simpler form of fenestration.

Whilst of considerable historic interest, the north and west elevations are secondary frontages that were, unlike the south elevation, not public-facing and their architectural expression reflects that status. Both elevations are marked by later alterations, including a large quantity of modern servicing comprising pipework and ducting (see **Appendix 1 - Figures 1.4 and 1.5**). These obscure – to a significant degree – the lower storeys and extends to cover the northern west corner, rising from ground to roof level. The pipework, which is accretive and unsightly, materially detracts from an appreciation of the architectural qualities of the Lycian Building. The removal of this pipework was consented under planning ref. 2023/4903/L.

Significance of the New Wing Building

The New Wing Building was completed in 1978 to designs by Sir Colin St Wilson. The New Wing is considered to have a low significance owing to its late construction date and minimal architectural detailing (see **Appendix 2 – Figure 2.1**). The north and west elevations of the New Wing are secondary façades of little architectural interest. They consist of large expanses of stock brick with a low parapet enclosing plant at roof level. The functional areas and offices (which occupy this northern portion of the wing) are not considered to be significant. The removal of a flue and external services on the north elevation of the New Wing was consented under planning ref. 2023/4903/L.

Assessment

The Proposals involve the erection of temporary scaffolding in three locations across the north and west façades of the New Wing and Lycian Buildings. The scaffolding is necessary to safely implement the works already consented under application ref. 2023/4903/L.

To ensure stability, it is required to tie the scaffolding to the external building envelope using eye screws and nylon plugs. It is proposed to fix 10mm screw bolt into the brick work of the Lycian and the concrete frame of the New Wing Buildings.

The total number of ties required is as follows:

- 10no. ties to the north elevation of the Lycian Building;
- 12no. ties to the west elevation of the Lycian Building;
- 15no. ties to the north elevation of the New Wing building; and
- 4no. ties to the west elevation of the New Wing Building.

This method is the one which we understand will cause the least damage to the façade. It is not possible to tie the scaffolding to the mortar joints as the mortar is not strong enough to pass the pull tests and would lead to damage to two or three bricks at each location rather than just affecting one.

Once the service pipework has been removed and temporary scaffolding has been dismantled, the affected elevations will be made good. The elevations will be cleaned and repaired where necessary – including replacement on a like-for-like basis of defective brick and stone masonry and pointing.

The direct impact to the listed building, resulting from the fixing of eye screws, must be considered in the context of the north and west façades of the Lycian and New Wing Buildings, which are heavily altered and of secondary significance. The outcome of the proposals is to facilitate the consented works to remove modern and unsightly pipework and servicing, and ultimately the making good of the façades, therefore markedly improving the appearance of this area of the listed building and better revealing the architectural quality of the Lycian Building.

The proposals are temporary and have been designed to cause the least impact as is possible to the listed fabric, while facilitating the works consented under planning ref. 2023/4903/L.

Overall, we do not identify any harm to the significance of the Grade I listed building as a result of the temporary erection of scaffolding. The limited loss of fabric arising from the screw holes in the brickwork occurs in the context of facilitating the removal of the substantial existing pipework, ducting and servicing currently affixed to the elevation, which will markedly enhance its character. The elevation will be made good in the operational condition.

CONCLUSION

The Proposed Development is considered to accord with the relevant planning and heritage legislation. We, therefore, respectfully consider that the Proposal is appropriate and listed building consent (this Application) should be granted.

APPLICATION MATERIAL

The Application comprises the following documentation:

- Completed Application Form (Listed Building Consent) prepared by Montagu Evans;
- This Covering Letter (Heritage Statement) prepared by Montagu Evans;
- Scaffold Tie Pull Out Test Report by the Applicant;
- Elevations, plans and sections relating to the scaffolding on the north and west façades of the Lycian Building (drawing numbers 9045-24-01 to 02, and 9045-24-03b to 05b) by Griffin Scaffolding London;
- Elevations, plans and sections relating to the scaffolding on the west façade of the Lycian Building (drawing numbers 9045-24-09 to 11, and 9045-24-12b to 14b) by Griffin Scaffolding London; and
- Elevations, plans and sections relating to the scaffolding on the north and west façades of the New Wing Building (drawing numbers 9045-24-06b to 08b) by Griffin Scaffolding London.

ADMINISTRATIVE MATTERS

The Application has been submitted via the Planning Portal under reference PP-13897728.

There is no fee applicable for Listed Building Consent.

We would be grateful if LB Camden could confirm that our Application is completed and will be validated shortly. In the meantime, should any further clarification, information or assistance be required, please contact Graham Allison, Rosie Adamson, Eleanor Mazzon or Bridget Crossley of this office in the first instance.

Yours sincerely,



Montagu Evans LLP

Enc.

APPENDIX 1



Figure 1.1 - Photograph showing bomb damage to the south-west corner of the Museum.



Figure 1.2 - Post-war photograph showing damage to the Lycian Building.



Figure 1.4 - View looking up the west elevation of the Lycian Building, showing the extent of ducting to the façade. Scaffolding will be tied into the north and west elevation of the Lycian Building.



Figure 1.5 - View of the ground storey of the Lycian Building where it meets the existing portacabin block.



Figure 1.6 - View looking at the north and west elevation of the New Wing Building with the existing portacabin block in the foreground. Scaffolding will be tied into the north and west elevation of the New Wing Building.

APPENDIX 2



Figure 2.1 – Extract of Significance Plan (Level 1) and corresponding legend, showing north and west elevations of the Lycian Building (in purple) and north and west elevations of the New Wing Building (in blue)