

Elaine Quigley
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Development Management Team
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12th June 2020

Dear Elaine,

Application for a Minor-Material Amendment to Planning Consent ref: 2019/6311/P and associated Listed Building Consent | British Museum, Great Russell Street, London WC1B 3DG

Introduction

Enclosed is a minor-material amendment (MMA) application pursuant to Section 73 (s73) of the Town and Country Planning Act 1990, together with an associated listed building consent, made in relation to the White Wing refurbishment works at British Museum, Great Russell Street, London WC1B 3DG.

The MMA application seeks the variation of Condition 3 of the respective planning permission (ref: 2019/6311/P) to facilitate a minor change to elements of the scheme that have been previously approved, namely changes to ductwork arrangement in the courtyard; size of the chiller plant on roof deck; removal of bookshelves at various locations and the reinstatement of an external window in the east courtyard wall.

An associated listed building consent application is also enclosed. The proposed description of development of which is: *“Listed building consent (in association with LBC ref. 2019/6434/L) for minor amendments to the White Wing refurbishment works to include the removal of bookshelves at various locations, reinstatement of an external window in the east courtyard, revised layout to the ductwork arrangement in the courtyard and changes to the height of the chiller plant on the roof deck.”*

This application is submitted following an exchange of emails with London Borough of Camden (LBC) planning and design officers who have confirmed the planning process pursued.

Application content

This application for an MMA and listed building consent has been submitted via the Planning Portal (ref: PP-08789169 and PP-08789221). This covering letter contains the planning background and justification for the works. It is submitted alongside the following application and supporting documents:

- Application form
- Location Plan at scale 1:1250
- Existing, approved and proposed plans by HOK (see drawing list)
- Design and Access and Heritage Statement addendum prepared by HOK Architects
- Plant specification
- Community Infrastructure Levy (CIL) form

Applications for listed building consent are exempt from payment. A fee of £234 has been paid for the MMA. The relevant CIL form is enclosed. The proposed amendments do not increase the floorspace figures. Notwithstanding this, The British Museum is a registered charity and will be wholly used for charitable purposes. Therefore, the proposed development is exempt from CIL payment.

Background to project

Parts of the White Wing are in need of urgent repair and upgrade. This was first identified in a Feasibility Study carried out in 2007. A series of applications have since been submitted and approved and works to galleries 42-45 already delivered as the new Albukhary Foundation Gallery of the Islamic world. Further works were also delivered in 2016/17 to improve the escape strategy by providing a new 6 level fire escape stair and lift in the White Wing lightwell.

Full planning permission and listed building consent (ref. 2019/6311/P and 2019/6434/L) for the works proposed as part of the latest set of works to the White Wing were granted by LBC, on 9 March 2020. This approved scheme permitted the replacement of mechanical and electrical services throughout to provide new heating, installation of new plant at roof level, upgrade to fire and life safety systems and general internal improvements to the office and staff welfare facilities at the British Museum.

The approved description of development under the planning permission (ref: 2019/6311/P) is:

“Installation of chiller unit plant at roof level (level 6a), replacement of ductwork, new floor mounted extract fan, installation of extract duct from basement to roof level and replacement ductwork through the basement window all within the lightwell, installation of 4 solar shading louvres over the replacement roof lanterns (as approved under ref: 2019/5564/P), replacement of block up second floor window with new window and new metal grille at north-west elevation.”

The approved description of development under LBC (ref: 2019/6434/L):

“Installation of chiller unit plant at roof level (level 6a), replacement of ductwork, new floor mounted extract fan, installation of extract duct from basement to roof level and replacement ductwork through the basement window all within the lightwell, installation of 4 solar shading louvres over the replacement roof lanterns (as approved under ref: 2019/5564/P), replacement of block up second floor window with new window and new metal grille at north-west elevation, internal works including new partitions and doors at basement, ground, first and second floor level (level 1-6), removal of internal doors worktops and bookcases, reconfiguration of basement, ground, mezzanine, and first floor level bathrooms, removal and replacement of ground floor ceilings and new services.”

Following further detailed design analysis post consent, details like building services have been re-confirmed with manufacturers' sizes. This has resulted in the amendments now proposed in this application.

Proposals

All design changes are as described in detail in the Design and Access and Heritage Statement Addendum. They can be summarised as follows:

- **Reinstatement of an external window in the east courtyard wall in a blocked-up window opening on level 1** | The consented scheme allowed for the consolidation of plant equipment which means that the current mechanical routes via this original window opening are no longer required. The reinstatement of the window, along with the demolition of the lean-to brick structure, are now proposed.
- **Removal of bookshelves at various locations, specifically partial removal on level 2 offices B/2/014 & B/2/037** | The consented scheme included the removal of some post twentieth century, internal office bookshelves. Further bookshelves are now proposed for partial removal due to operational requirements of the British Museum, specifically in rooms B/2/014 and B/2/037. There are good quality bookshelves retained in other rooms in the White Wing, for example in rooms B/2/032, B/2/038, B/4/020.
- **Amended ductwork arrangement in the courtyard** | The consented scheme consolidated the plant in the plantroom at level 01. However, since the grant of consent, further refinement of plant selection has led to the re-arrangement of duct layout in the courtyard. The original consent allowed the ductwork to go from the plant room at level 1 to the storeroom at level 2. The amended arrangement will see the duct route exit the plant room at level 1 and enter the building at level 2, through an existing sash window (no. W/03-M/10), which currently has existing services running through. The location of penetration from the plant room has not changed.
- **Amended size of chiller plant on the roof deck** | The consented scheme granted consent for a new chiller unit on the roof deck. Approximate dimensions of the plant were provided. Since the grant of consent further work by the M&E team has confirmed the length of the plant (4500 mm long) and identified a requirement to add an extension plenum (approx. 500mm) to the top of the chiller. This will be a galvanised steel fabrication and will be painted in a suitable colour to help it blend in with the background surface colours. The overall height will remain below the surrounding parapets levels in the courtyard.

Proposed planning process

As has been agreed with LBC, the works listed above are to be amended by an MMA and a new listed building consent application that will be layered over the existing listed building consent.

MMA process | The proposals involve amendments to the size of the chill plant, the re-arrangement of the ductwork and reinstatement of a sash window. The height, mass, site coverage and floorspace will remain within the external envelope of the consented scheme. Its scale in relation to the original approval is not altered. The use is also as per the approved scheme and not modified. The description of development will remain largely unchanged, but it would highlight the changes that are being sought. The red line boundary is not affected.

While the amendments do alter the size of the plant and appearance within the courtyard, there will be no other material effect on third parties (there is no change to design, heritage and amenity considerations). Nor do they alter the conclusions of the reports submitted with the approved scheme. The planning policy assessments all remain valid. The scale and nature of the amendment is not substantially different from the approved scheme in planning terms.

Variation to Condition 3 | To secure the proposed changes, a number of approved drawings will need to be replaced on the original planning permission. A drawing list is submitted (see Appendix 1), which identifies the drawing numbers that have been updated. The MMA seeks the variation of Condition 3 of the respective planning permission to facilitate a minor change to elements of the scheme that have been previously approved but now require change.

The original planning and listed building consent application was submitted on 19th December 2019. Following comments received on the applications from LBC officers, the design team submitted revised drawings in response. However, these revision numbers are not all reflected in the final decision notices. To secure the proposed change, a number of approved drawings will, therefore, need to be replaced. This will require rewording of Condition 3 of the approved planning permission to read as follows:

“The development hereby shall be carried out in accordance with the following approved plans: BMWW-HOK-ZZ-ZZ-DR-A-1100 rev P06, BMWW-HOK-ZZ-B-DR-A-2000 rev P06, BMWW-HOK-ZZ-G-DR-A-2001 rev P06, BMWW-HOK-ZZ-M-DR-A-2002 rev P06, BMWW-HOK-ZZ-F-DR-A-2004 rev P06, BMWW-HOK-ZZ-GA-DR-A-2005 rev P06, BMWW-HOK-ZZ-ZZ-B-DR-A-2100 rev P07, BMWW-HOK-ZZ-G-DR-A-2101 rev P06, BMWW-HOK-ZZ-M-DR-A-2103 rev P06, BMWW-HOK-ZZ-F-DR-A-2104 rev P06, BMWW-HOK-ZZ-GA-DR-A-2105 rev P04, BMWW-HOK-ZZ-G-DR-A-2201 rev P07, BMWW-HOK-ZZ-D-DR-A-2101 rev P07, BMWW-HOK-ZZ-B-DR-A-2200 rev P07, BMWW-HOK-ZZ-M-DR-A-2202 rev P06, BMWW-HOK-ZZ-F-DR-A-2203 rev P06, BMWW-HOK-ZZ-ZZ-DR-A-4001 rev P06, BMWW-HOK-ZZ-ZZ-DR-A-4002 rev P05, BMWW-HOK-ZZ-ZZ-DR-A-5004 rev P07, BMWW-HOK-ZZ-ZZ-DR-A-5050 rev P02, BMWW-HOK-ZZ-ZZ-DR-A-7000 rev P07, BMWW-HOK-ZZ-ZZ-DR-A-7001 rev P04, BMWW-HOK-ZZ-ZZ-DR-A-8000 rev P07, BMWW-HOK-ZZ-ZZ-DR-A-8003 rev P07

(NB: The plans highlighted in blue identify the replacement plans submitted with this MMA application. The plans in green are the correctly referenced approved drawings (originally submitted to LBC in Jan 20) that need to be substituted on the revised decision notice). The plan in black text is correctly referenced). See Appendix 1 for the full drawing list.

Planning policy context and assessment

There have been no major changes in national or local planning policy since the original approval. The policies within The National Planning Policy Framework 2019 (NPPF) including the Planning Practice Guidance updated 2019 (PPG); and the Development Plan form a material consideration in the determination of this application. As per the original application, the Development Plan is formed of GLA's London Plan 2019 (which is under review), and the Camden Local Plan comprised of: The Camden Local Plan July 2017; the Site Allocations Plan September 2013 and the policies map (updated version) January 2019. The following policies have been considered in devising this proposal: NPPF Section 12 'Well-designed Places' and Section 16 'Conserving and Enhancing the Historic Environment'; London Plan policy 7.8 Heritage assets and archaeology, 7.9 Heritage-led regeneration; LBC strategic policy D1 Design, D2 Heritage.

In addition, supporting information to the Development Plan is found in the Camden Planning Guidance Documents which have also been reviewed as part of the proposed amendments, including CPG Design (March 2019), CPG Energy Efficiency and Adaptation (March 2019) and CPG Amenity (March 2019). Other relevant guidance is within Bloomsbury Conservation Area Statement and Management Strategy (April 2011).

Assessment of work

The primary planning policy consideration for the proposed works is the design impact of the works on heritage significance, namely the special architectural and historic character of the Grade I listed building. The key policy consideration are as follows:

- Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. It requires heritage assets to be conserved in a manner appropriate to their significance.

- Policy D1 of Camden’s Local Plan requires that development preserves or enhances the historic environment and heritage assets in accordance with Policy D2.
- Policy D2 also states that proposals that reduce the energy consumption of listed buildings will be welcomed provided that they do not cause harm to the special architectural and historic interest of the building or group. It recognises that energy use can be reduced by means that do not harm historic fabric or appearance, including through roof installation; secondary glazing; more efficient boilers/plant and heating and lighting systems.

Design and heritage | A Design and Access and Heritage Statement addendum, prepared by HOK Architects, is submitted in support of this application. The Heritage Impact Assessment is included at Section 4 of this document. In summary, the design and heritage impact of each of the proposed design amendments is outlined below:

- **Amended ductwork arrangement in the courtyard and reinstatement of an external window** | The consolidation of plant from the rooms at level 01 has resulted in the re-arrangement of ductwork. The amended duct route will reuse an existing service route through a sash window at level 2. By reusing the existing service route, there will be no impact on the listed fabric. The proposed ductwork route will remain within the courtyard of the White Wing and therefore will not be seen from the street, nor will it affect the overall appearance of the conservation area. The re-arrangement has also freed up a currently blocked up window. The British Museum wish to reinstate a timber sash window in this location to allow daylight into the corridor. The material and style of the window will match other windows in the corridor. The proposed window will improve the quality of space within the building and improve the appearance of the listed building, in accordance with Policy D1.
- **Removal of bookshelves at various locations, specifically partial removal on level 2 offices B/2/014 & B/2/037** | The British Museum requires additional space in these offices to meet their operational needs. Some of the bookshelves in these rooms are proposed to be removed in order to meet the requirement. The Museum has been adding bookshelves over the years, so the bookshelves are post twentieth century additions. There is no impact on historic fabric or the significance of the listed building. The proposed amendments will improve the working environment in the White Wing and the overall operations of the Museum.
- **Amended height of chiller plant on the roof deck** | The original application included approximated dimensions of the chiller plant. The dimensions of the approved chiller plant at level 7 have been confirmed following further design development and using a more accurate engineer’s performance specification. The length of the plant is now 4500mm long. Due to the enclosed nature of the plant’s location, an additional 500mm high cowl is required to help disperse heat produced from the plant. The cowl will be made of galvanised steel and will be painted in a suitable colour so it is sympathetic to its setting. The proposed cowl will be slightly higher than the east parapet but the chiller is located on the west side of the courtyard and the proposed cowl will not be higher than the parapet walls at the north, south and west. The overall amended height of the chiller plant will not be seen from the street or neighbouring properties and, therefore, will not impact on the appearance of the listed building and the conservation area, in accordance with Policy D2. The proposal also will decrease the chiller’s noise output from 82dB(A) to 80.3 dB(A) and thus will not have any amenity impact on neighbouring properties. The proposed amendments do not have any impact on the conclusions that the noise impact assessment previously reported and will remain as approved.

Overall, the proposed amendments fully respect the special architectural or historic interest of the listed building; and meet planning policies within the Development Plan and the NPPF. They are essential works required to improve the operation of the Museum. The proposals will facilitate the already approved scheme to ensure that the building is optimal in its layout and design, and best able to enhance the building’s important status and significance.

If you have any questions, please contact melanie@theplanninglab.com (0207 257 9363).

Yours sincerely,

Kelly Ryder | Director
The Planning Lab

Appendix 1: Drawing list of approved and replacement drawings

Drawing name	Currently approved drawings (ref: 2019/6311/P)	Revised drawings submitted to LBC on 14.1.20 (to be substituted/listed on the revised decisions, as part of this application (except where ruled out)	Drawings forming part of the MMA and LBC application (to replace the Jan 20 drwgs where listed)
LOCATION PLAN & SITE PLAN	BMWW-HOK-ZZ-ZZ-DR-A-1100 rev P04	BMWW-HOK-ZZ-ZZ-DR-A-1100 rev P06	
FLOORPLAN-LEVEL 01 BASEMENT-EXISTING	BMWW-HOK-ZZ-B-DR-A-2000 rev P04	BMWW-HOK-ZZ-B-DR-A-2000 rev P06	
FLOORPLAN-LEVEL 02 GROUND-EXISTING	BMWW-HOK-ZZ-G-DR-A-2001 rev P04	BMWW-HOK-ZZ-G-DR-A-2001 rev P06	
FLOORPLAN-LEVEL 03 MEZZANINE-EXISTING	BMWW-HOK-ZZ-M-DR-A-2002 rev P04	BMWW-HOK-ZZ-M-DR-A-2002 rev P06	
FLOORPLAN-LEVEL 04 FIRST-EXISTING	BMWW-HOK-ZZ-F-DR-A-2004 rev P04	BMWW-HOK-ZZ-F-DR-A-2004 rev P06	
FLOORPLAN-LEVEL 06 GALLERY-EXISTING	BMWW-HOK-ZZ-GA-DR-A-2005 rev P04	BMWW-HOK-ZZ-GA-DR-A-2005 rev P06	
FLOOR PLAN LEVEL 01 PROPOSED	BMWW-HOK-ZZ-B-DR-A-2100 rev P04	BMWW-HOK-ZZ-B-DR-A-2100 rev P06	BMWW-HOK-ZZ-ZZ-B-DR-A-2100 rev P07
FLOOR PLAN LEVEL 02 PROPOSED	BMWW-HOK-ZZ-G-DR-A-2101 rev P04	BMWW-HOK-ZZ-G-DR-A-2101 rev P06	
FLOOR PLAN LEVEL 3 ROOF PROPOSED	BMWW-HOK-ZZ-M-DR-A-2103 rev P06	BMWW-HOK-ZZ-M-DR-A-2103 rev P06	
FLOOR PLAN LEVEL 4 FIRST PROPOSED	BMWW-HOK-ZZ-F-DR-A-2104 rev P04	BMWW-HOK-ZZ-F-DR-A-2104 rev P06	
FLOOR PLAN LEVEL 6 GALLERY PROPOSED	BMWW-HOK-ZZ-GA-DR-A-2105 rev P04	BMWW-HOK-ZZ-GA-DR-A-2105 rev P04	
FLOOR PLAN LEVEL 02 DEMOLITION	BMWW-HOK-ZZ-G-DR-A-2201 rev P04	BMWW-HOK-ZZ-G-DR-A-2201 rev P06	BMWW-HOK-ZZ-G-DR-A-2201 rev P07
FLOOR PLAN LEVEL 3 MEZZANINE PROPOSED	BMWW-HOK-ZZ-M-DR-A-2102 rev P04	BMWW-HOK-ZZ-M-DR-A-2102 rev P06	BMWW-HOK-ZZ-D-DR-A-2101 rev P07
FLOOR PLAN LEVEL 01 DEMOLITION	BMWW-HOK-ZZ-B-DR-A-2200 rev P04	BMWW-HOK-ZZ-B-DR-A-2200 rev P06	BMWW-HOK-ZZ-B-DR-A-2200 rev P07
FLOOR PLAN LEVEL 3 MEZZANINE DEMOLITION	BMWW-HOK-ZZ-M-DR-A-2202 rev P04	BMWW-HOK-ZZ-M-DR-A-2202 rev P06	
FLOOR PLAN LEVEL 4 FIRST DEMOLITION	BMWW-HOK-ZZ-F-DR-A-2203 rev P04	BMWW-HOK-ZZ-F-DR-A-2203 rev P06	
CRAWFORD STAIR PLANT LEVEL	BMWW-HOK-ZZ-ZZ-DR-A-4001 rev P03	BMWW-HOK-ZZ-ZZ-DR-A-4001 rev P05	BMWW-HOK-ZZ-ZZ-DR-A-4001 rev P06
STAIRS S17 PLANS & SECTIONS	BMWW-HOK-ZZ-ZZ-DR-A-4002 rev P03	BMWW-HOK-ZZ-ZZ-DR-A-4002 rev P05	
COURTYARD ELEVATIONS-EXISTING	BMWW-HOK-ZZ-ZZ-DR-A-5004 rev P05	BMWW-HOK-ZZ-ZZ-DR-A-5004 rev P07	
COURTYARD ELEVATIONS PROPOSED	BMWW-HOK-ZZ-ZZ-DR-A-5005 rev P03	BMWW-HOK-ZZ-ZZ-DR-A-5005 rev P05	BMWW-HOK-ZZ-ZZ-DR-A-5050 rev P02
PROPOSED SECTIONS-ROOF	BMWW-HOK-ZZ-ZZ-DR-A-7000 rev P05	BMWW-HOK-ZZ-ZZ-DR-A-7000 rev P07	
PROPOSED SECTIONS-CORRIDOR	BMWW-HOK-ZZ-ZZ-DR-A-7001 rev P02	BMWW-HOK-ZZ-ZZ-DR-A-7001 rev P04	
ROOF DETILS	BMWW-HOK-ZZ-ZZ-DR-A-8000 rev P05	BMWW-HOK-ZZ-ZZ-DR-A-8000 rev P07	
EXTERNAL WINDOW DETAILS	BMWW-HOK-ZZ-ZZ-DR-A-8003 rev P04	BMWW-HOK-ZZ-ZZ-DR-A-8003 rev P06	BMWW-HOK-ZZ-ZZ-DR-A-8003 rev P07