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London Borough of Camden
Development Management Team
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Dear Officer

Applications for planning and listed building consent | British Museum Proposed temporary mechanical ventilation works to Gallery 33

Introduction

On behalf of the Trustees of the British Museum, we enclose applications for planning and listed building consent to install a temporary ventilation system to support the re-opening of Gallery 33 to the public at the British Museum, (BM), Great Russell Street, London, WC1B 3DG.

Gallery 33, located within the King Edward VII building (KEB) is ventilated with fresh air via the purpose built sub basement tunnels of the KEB building. However, following a building inspection of the tunnels in 2019 which identified water ingress and subsequent mould and bacterial growth, Gallery 33 has been closed on health and safety grounds. This proposal is for a temporary ventilation solution, that will enable the gallery to safely reopen to the public, while the longer term remedial works to the KEB tunnels is assessed and carried out.

The proposed description of development is:

"Installation of temporary external ducting on the South East and South West elevations of the King Edward Building, removal (and storage) of 6no. window panes on the SE elevation and installation of vents. Removal and storage of 4no. window panes on the SW elevation, new ducting and new fan unit on ground"

It has been confirmed with LBC officers via an initial exchange of emails in March 2021 that the proposal requires planning and listed building consent.

Submission content

This application has been submitted via the planning portal (ref: PP-1033422). The following forms the submission and supporting documents:

- Application form;
- Location Plan at scale 1:1250 and Block Plan at scale 1:500, prepared by Nex;
- Existing and proposed drawings prepared by Nex
- Design and Access Statement, prepared by Nex
- Heritage Statement prepared by Donald Insall Associates
- Noise report prepared by RSK Acoustics.

The relevant planning application fee of £462 has also been submitted. This is based on the site area of 15.5sqm, just around the area of proposed works. There is no fee for an application for listed building consent.

The Site

British Museum Estate | The British Museum is one of the UK's most popular visitor attractions. BM was founded in 1753, the first national public museum in the world, and has been open to the public since 1759. With approximately eight million objects in the collection, it is arguably the world's greatest display of human history, culture and art. Both permanent collections and special exhibitions are presented within displays for the public. The BM's Bloomsbury estate is situated on the north side of Great Russell Street within the Bloomsbury Conservation Area. It is bounded by Montague Place, Montague Street, Bloomsbury Street and Great Russell Street. The estate houses a number of important listed buildings, including the Grade I listed Quadrangle Building, the KEB, north of the site and subject to this application; and other listed elements such as the railings and a number of lampposts at the front. The original elements of BM date back to 1755- 1822 when Montague House was purchased to house the new British Museum collection. There was a need to expand BM as the collection grew bigger. Robert Smirke was the designer of a masterplan which dates from 1823-47. His plans consisted of four wings with an impressive iconic colonnade along the building's south elevation. This building consists of two principle storeys, adhering to the Greek Revival style, which also includes the columns and pediment at the South entrance.

Surrounding uses and designations | These include a range of commercial office, hotel, residential and education uses. The BM is located in the Midtown BID district (Holborn, Bloomsbury, St Giles), an Archaeological Priority Area, the Background Strategy View (Blackheath), and the Central Activity Zone (CAZ). The BM is located within an area of excellent transport accessibility with a PTAL rating of 6b. It is close to Russell Square, Holborn, Tottenham Court Road and Goodge Street tube stations, several bus routes operate along Southampton Row and Bloomsbury Street. There are cycle networks in close proximity with secure bike stands. There is a Santander bike hire stand towards the junction between Great Russell Street and Montague Street.

Conservation Plan & heritage significance of the KEB | A detailed review of the heritage significance of the estate and the KEB site that is affected by these proposals is set out in the Heritage Statement prepared by Donald Insalls. The BM's Conservation Plan was also originally adopted in 1999 and later revised by Purcell Architects in 2007/8. The Conservation Plan contains a detailed appraisal of the significance of the BM as a whole and highlights that it represents the high point of neo-classical Museum style in the UK. As noted above, much of the BM's estate is Grade I listed, being of international significance and sitting in the Bloomsbury Conservation Area. The Site was constructed under numerous phases from Smirke's Quadrangle masterplan to the 21st century WCEC. There is innate value in the historical built fabric overall, especially where it survives from the earliest building phases. The use of pioneering construction techniques and innovative design across the phases is also important as are the BM's association with a succession of architectural figureheads. Its special architectural and historic character can in part be attributed to the significance of its collection and the considerable social value attributed to its use as a Museum; containing of some of the world's most valuable and coveted collection of ancient artefacts. The BM was founded on the principle that its collection was for the nation and would, therefore be accessible to everyone. This is a key theme which continues today and is a driving force behind much of the BM's decision making and future planning.

The KEB was constructed as an extension to the museum in 1906-1914. Overall, it is of exceptional architectural and historic special interest, being separately listed at Grade I. The building is an important work by the prominent architectural practice JJ Burnet. The KEB is the only executed building of a comprehensive masterplan by Burnet to enlarge the museum to fill the entire city block and replace all surviving terraced Georgian houses around the museum's perimeter with museum accommodation. Whilst the masterplan did not come to pass, the galleries were built and houses part of the museum's collection. Also see Donald Insall's more detailed commentary describing the significance of the area impacted by the works.

The Bloomsbury Conservation Area as a whole derives its special interest from its surviving early street pattern, which is laid out in a rectilinear pattern with straight streets leading to open squares, which are often landscaped. The dominant architectural form is the townhouse, with some earlier 17th and 18th century examples surviving alongside later 19th century properties, though a large proportion have been adapted during the 20th century for office or other uses.

The Bloomsbury Conservation Area Appraisal states that "the British Museum is a cultural institution of international importance, occupying a major ensemble of outstanding Grade I listed buildings which make a significant contribution to the character and appearance of the conservation area as a whole". It recognises that large portions of the BM cannot be seen from the public realm due to the 'backland nature of much of the site'.

Background and Proposals

Gallery 33 is supplied with fresh air via the purpose-built ventilation tunnels – the KEB tunnels. The tunnels have suffered water ingress and as a result there is damp and mould present. The tunnels are therefore not safe to provide fresh air to Gallery 33 and the Gallery has been closed to the public due to lack of suitable ventilation. The Museum is keen to re-open this important gallery to the public and is currently trailing a low level of public access using natural ventilation through building fabric, this is being closely monitored with CO2 monitors to insure it is safe. However, to enable a greater number of visitors into the gallery at one time, it has been concluded that a mechanical ventilation and extract system will be needed. This application seeks consent for the works associated with this mechanical system which will divert an existing air handling unit via new ductwork to provide fresh air directly into the gallery. As there are no suitable existing openings for the duct work to be accommodated, panes of glass are proposed to be temporarily removed from the window and stored on site, to allow new air supply grilles to be fitted into the openings. These will feed the fresh air into the gallery. The extract grilles at the south western end of the gallery will extract air to ensure adequate movement of air through the gallery. All the external works are proposed on the elevation which is internal to the Museum estate, therefore, there is very limited public views, or wider visibility of the affected elevations.

The proposed temporary works are as follows:

South east elevation –

- Retain existing air handling unit
- Alter existing external duct work to supply air to gallery 33
- Removal of 6 No. panes of glass
- Installation of 6 No. new air supply grilles
- Install additional ducting fixed with standard brackets (avoiding stone dressings and sills)

South west elevation –

- New externally mounted extract fan on ground
- New external duct work connecting to high level louvres above windows
- Extract plenums fixed to window frames

Temporary consent | The mechanical system is considered to be a temporary solution to enable greater public access to the gallery while the KEB tunnels are investigated for water ingress, then refurbished and treated for damp and water ingress. The works to the KEB tunnels are likely to take a number of years to resolve and deliver and for this reason the consent for the temporary solution is sought for a period of 5 years.

The construction for the long term solution will likely be a lengthy process. The Museum anticipates that it will take some time to investigate and relocate all of the existing equipment from the tunnels. It is possible that construction will be phased due to the complexities of alternative (or potentially temporary) servicing to cover the existing MEP equipment in the tunnels and the scale of this installation. The proposals are likely to involve structural and M&E works. It may even potentially include works to the wider water system which may require consulting external stakeholders like Thames Water. This would need to be carried out before submitting the planning application in 2022/2023.

It is considered that this period of time will be sufficient for the necessary investigative works, design solution and construction works in the tunnels. We have set out below a high level programme of works to be carried out while the temporary solution is in place:

2021/22 –

- Identify record information
- Report on findings with guidance for investigations
- Agree investigation works with LBC Planning and Conservation
- Tender investigation works
- Carry out investigations
- Investigations reporting

- Further investigations as needed
- Options appraisal for resolution

2022/23 –

- Design period for long term solution
- Consents period (LBC)
- Tender for construction
- Enabling works
- Construction

2023/24 –

- Construction

2025 –

- Removal of temporary solution on completion of construction

Planning policy context

The policies within The National Planning Policy Framework 2021(NPPF) (including the NPPG); and the Development Plan form a material consideration in the determination of this application. The Development Plan is formed of GLA's London Plan 2021 and the Camden Local Plan adopted in July 2017. These documents are supported by Camden's Planning Guidance Note on Design; and the Bloomsbury Conservation Area Appraisal 2011.

The LBC planning policies most relevant to the consideration of the works presented as part of this application include D1 (Design), and D2 (Heritage) and A4 (Noise and Vibration).

Policy D2, reflects the aims of the NPPF: developments that involve the loss or substantial harm to a designated heritage asset will not be permitted unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Developments that propose less than substantial harm are required to be convincingly outweighed by the public benefits of the proposed works. Development should also preserve or enhance the historic environment and heritage assets. LBC will resist development that would cause harm to significance of a listed building through an effect on its setting.

London Plan Policy HC1 (Heritage Conservation and Growth) requires development proposals affecting heritage assets, and their settings, to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Other relevant guidance is Historic England's Conservation Principles, Policies and Guidance (April 2008). Paragraph 117 of the documents confirms that repair necessary to sustain the heritage values of a significant place is normally desirable if:

- a) there is sufficient information comprehensively to understand the impacts of the proposals on the significance of the place; and
- b) the long term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future; and
- c) the proposals are designed to avoid or minimise harm, if actions necessary to sustain particular heritage values tend to conflict.

LBC LP policy A1 seek to protect the quality of life of occupiers and neighbours. Permission will be granted for development unless the proposals cause unacceptable harm to amenity, with plant noise limits set in accordance with LBC policy A4.

Planning justification

Heritage and Design | The proposed works are a temporary arrangement which will enable the opening of Gallery 33 to more of the public. During this period the repair of the KEB tunnels will take place. Overall, Donald Insall has concluded that the proposals would conserve the KEB galleries and the setting of the British Museum and the character or appearance of the Bloomsbury Conservation Area, due to its temporary and reversible nature. There would be a small amount of temporary and reversible less than substantial harm caused by the

temporary addition of external ducts, their fixings and their small internal manifestations. This impact is unavoidable, and without it, it will not be possible to affect the long term beneficial repair of the KEB tunnels. There are also public benefits that would be brought about by these proposals including:

1. The temporary ventilation system would allow greater public access to Gallery 33, an important space in the British Museum that has key exhibits of the China and South Asia collection and that is currently closed due to the failure of the existing air handling system. From a health and safety perspective, the proposals would also create a better environment for visitors to enjoy the exhibits safely.
2. The proposal would facilitate the strategic investment into the estate and enable a well planned and long lasting repair of the permanent concealed air handling system.

Donald Insall Associates have also concluded that the public benefits of the proposals are considered to comfortably outweigh the temporary, low level less than substantial harm caused to the rear elevation of the KEB. The proposals are therefore in accordance with Policy D2 of the Local Plan and the NPPF.

The proposals are to the external elevation of the KEB building and have been designed to be in as discrete location as possible so as to avoid any significant visual impact from the public facing elevations. Where possible existing duct work has been used and new ductwork kept to a minimum in order to minimise impacts in accordance with Policy D1 of the Local Plan.

Amenity | A new extraction fan with external noise emissions will be installed within the northwest lightwell. The ventilation systems will only be required to run during the Museum's opening hours. The noise impact assessment has been prepared by RSK Acoustics and submitted as part of the submission, which concludes that the proposed system will be 10dB below background noise level so there will be no impact on the nearest residential receptors, located to the west of the site on Bedford Square (at least 50m away). The results indicated that an attenuator on the atmospheric outlet of the extract fan will be required to help reduce the noise limits for the closest gallery window. With the recommended mitigation, the proposals will not affect the nearest galleries. The new ventilation system therefore fully complies with LBC policy A1 and A4.

Summary

The proposed works for the temporary installation of a mechanical ventilation system to Gallery 33 will enable the gallery to be opened to the public more widely while ensuring the long term repair of the KEB tunnels. The temporary solution will contribute to the overall visitors' experience and in turn will help BM maintain its international reputation and meet with the objectives of the local and national policies. The external proposals will cause a low level of less than substantial harm which is temporary, completely reversible and is comfortably outweighed by the public benefits of the proposals. The proposals are not considered to cause any harm to the overall significance of the surrounding Conservation Area.

In accordance with the agreed terms of the BM Planning Performance Agreement (clause 9.3(h)) we look forward to confirmation of validation of the application within 3 working days of submission, or notification within the same timeframe to confirm if additional information is required.

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

Yours faithfully

The Planning Lab