Donald Insall Associates
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The British Museum, Roof Repairs

Historic Building Report

For the British Museum

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1.0 Summary of Historic Building Report

1.1 Introduction

Donald Insall Associates was commissioned by The British Museum in March 2023 to assist them in proposals to repair five low-level flat roofs at The British Museum, Great Russell Street, London

The investigation has comprised historical research, using both archival and secondary material, and a site inspection. A brief illustrated history of the site and building, with sources of reference and bibliography, is in Section 2; the site survey findings are in Section 3. The investigation has established the significance of part of the building in question, which is set out in Section 4 and summarised below.

The specific constraints for this building are summarised below. This report has been drafted to inform the design of proposals for the building, by Nex Architecture. Section 5 provides a justification of the scheme according to the relevant legislation, planning policy and guidance.

1.2 The Building, its Legal Status and Policy Context

The British Museum is a Grade I-listed building located in the Bloomsbury Conservation Area in the London Borough of Camden. It is in the setting of all the surrounding buildings, many of which are listed, including Senate House and Institute of Education (Grade-II*). Alterations to a listed building generally require listed building consent; development in conservation areas or within the setting of a listed building or conservation area requires local authorities to assess the implications of proposals on built heritage.

The statutory list description of the listed building is included in Appendix I and a summary of guidance on the Bloomsbury Conservation Area provided by the local planning authority is in Appendix II, along with extracts from the relevant legislation and planning policy documents.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 16, 66 and 72 of the Act impose statutory duties upon local planning authorities which, with regard to listed buildings, require the planning authority to have *'special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses*' and, in respect of conservation areas, that '*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*'.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the Site comprises the Camden Local Plan (2017) and The London Plan (March 2021).

The Camden Local Plan has policies that deal with development affecting the historic environment, in particular Policy D2: Heritage, which states that '*The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm*'.

Policy HC1 Heritage Conservation and Growth of The London Plan (March 2021) stipulates that *'(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings….Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process*.'

The courts have held that following the approach set out in the policies on the historic environment in the National Planning Policy Framework 2021 will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6). The key message of the NPPF is the concept of 'sustainable development' which for the historic environment means that heritage assets 'should be conserved in a manner appropriate to their significance'.

The NPPF recognises that, in some cases, the significance of a designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. The NPPF therefore states that any harm or loss to a designated heritage asset 'should require clear and convincing justification' and that any 'less than substantial' harm caused to the significance of a designated heritage asset should be weighed against the benefits of the proposal including, where appropriate, securing its optimum viable use. A designated heritage asset is defined as a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.

1.3 Summary Assessment of Significance

A detailed assessment of significance with guidance on the relative significance of elements of fabric and plan form and the extent to which these elements are sensitive to alteration is included in Section 4.0 of this report. The following paragraphs are a summary explaining why the listed building is considered of nationally-important architectural and historical interest.

The **British Museum** is the nation's foremost museum of cultural artefacts from across the world. The collections are of international importance; the buildings that house them are Grade-I listed and overall have exceptional value, both for their architecture and their history. The relative significance of the various parts of the museum is set out in the Conservation Management Plan by Purcell Miller Tritton (2008) and does not need to be replicated here. The elements of the building affected by the current proposals are the eastern corridor which connects the main South Front of the building with the East Residence, and the additions of various dates between this corridor and the White Wing. The corridor has very high significance, principally as a key element of the articulation of Robert Smirke's original design (although built by Sydney Smirke); one of the additions has high significance as a remaining fragment of an early extension by Sydney Smirke; the other additions are all mid- to late-twentieth century and have no significance.

The **Bloomsbury Conservation Area** is large and takes in Georgian terraced streets and garden squares developed by the Earl of Bedford, large university buildings of the 20th century, and commercial buildings including hotels on Southampton Row (leading to Euston Station). The site is in sub-area 3, which includes the British Museum and university buildings including Senate House; the area is defined by large-footprint, handsome buildings in a variety of styles which clearly express their function and stand in contrast to the tighter grain of surrounding terraced Georgian houses which otherwise dominate Bloomsbury.

1.4 Summary of Proposals and Justification

The proposals affect five flat roofs of a variety of construction types in a small area to the east of the main portico, covering both the connecting corridor between the main building and the East Residence, and later additions to the rear. These roofs are letting in water, which is causing damage to the building fabric (including some structural problems). Three of these roofs are modern, and make no contribution to the significance of the building; the roofs of the corridor itself and the room to the north at its west end, however, are patent slate roofs which are part of the early fabric, and make a contribution to the building's significance. This is firstly because one of the roofs is part of the original plan, and the other part of a very early addition made by the architect Sydney Smirke, who completed the original building; and secondly because both roofs have considerable interest as examples of patent slating, a relatively rare method of construction used mostly in the first half of the nineteenth century. This method was used on several roofs across the British Museum, but can now only be found on the two roofs dealt with here and a small roof on the west side of the building (roof D/3/X04); it was also used on other innovative buildings of the period, including the Palace of Westminster, where the roofs have generally failed due to their similarly shallow pitch.

It is proposed to refurbish all these roofs to prevent further water ingress and to improve their thermal performance by covering them with a layer of insulation under a new waterproof membrane. Because the slate roofs are of uncertain structural integrity it is also proposed to support them from below with a new timber structure, which will secure them and give enough certain strength to allow maintenance access. This part of the proposals will entail removing an existing historic lath and plaster ceiling of limited significance, and carefully dismantling a slate ceiling of moderate significance, to be reinstated once the works are completed.

Whilst these works will cause a small amount of harm to the significance of the British Museum, through the loss of a very small area of nineteenth-century lath and plaster, and possible damage to a surviving slate ceiling, they will preserve the significant slate

roofs in situ, which will sustain their contribution to the significance of the building. The waterproofing works are necessary to prevent further damage to the fabric of the museum from water ingress, and the insulation works will improve the thermal performance of the building; the structural works will ensure the slate roofs retain their structural integrity, and will allow maintenance access to the roofs and gutters. All these parts of the proposals act to sustain the significance of the British Museum, and thus afford sufficient public benefits to outweigh the 'less than substantial' harm that will be caused (in the terms of the NPPF).

2.0 Historical Background

2.1 The Development of Bloomsbury

The development of Bloomsbury was a result of London's early expansion northwards. Following the Dissolution of the Monasteries, the Manor of Bloomsbury had been assigned to Thomas Wriothesley, 1st Earl of Southampton, in 1550. In 1640, the 4th Earl of Southampton obtained a royal license to build his residence. However, development was delayed by the outbreak of the Civil War. Widespread development only commenced following the Restoration **[Plate 2.1]**, when in 1661 the 4th Earl of Southampton was granted a building license for the construction of Southampton Square (now Bloomsbury Square). This was one of the first London squares to be built and the Earl's own house, Southampton House, was erected on the north side **[Plate 2.2]**.

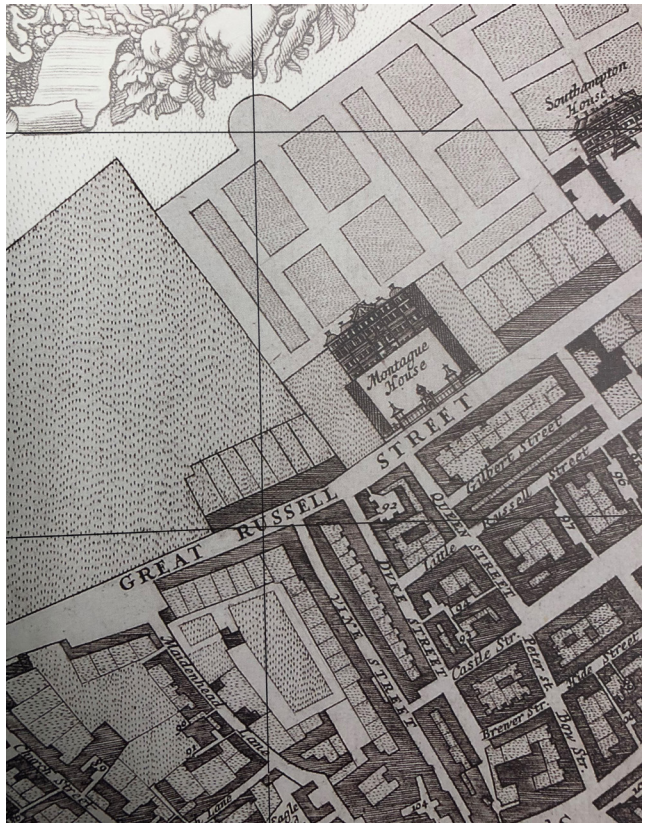
Development continued when the estate passed to the Russell family (the Dukes of Bedford) after the 4th Earl's daughter married William Russell in 1669. Southampton House became Bedford House and other notable developments of this period included the formation of Great Russell Street and Southampton Row (c.1670), and the construction of Montagu House, which became the home of the British Museum in 1759.

Smaller houses for artisans and workmen were provided in the hinterland. By the end of the eighteenth century, Richard Horwood's Map of London, Westminster and Southwark, 1792–9, shows that the street pattern, comprising wide streets and grand squares, extended northwards from Great Russell Street in two prongs along Tottenham Court Road to the west and Lambs Conduit Street to the east **[Plate 2.3]**. In between, the land to the rear of Bedford House and the British Museum remained open fields, bordered on the east side by Southampton Row and King Street.

Later expansion in Bloomsbury focussed on providing grander residential neighbourhoods for the upper middle-classes and was carried out speculatively by different builders, on leases obtained from major landowners.1 The redevelopment of the Bedford Estate was carried out during the first half of the nineteenth century. Bedford House was replaced by Bedford Place, a thoroughfare running north from Bloomsbury Square to Russell Square, a large garden square enclosed on all sides by fine terraced houses built between 1801 and 1804 to the designs of James Burton. By the time of the 1895 Ordnance Survey map, Bloomsbury's formal grid pattern of streets and garden squares had been fully established **[Plate 2.4]**.

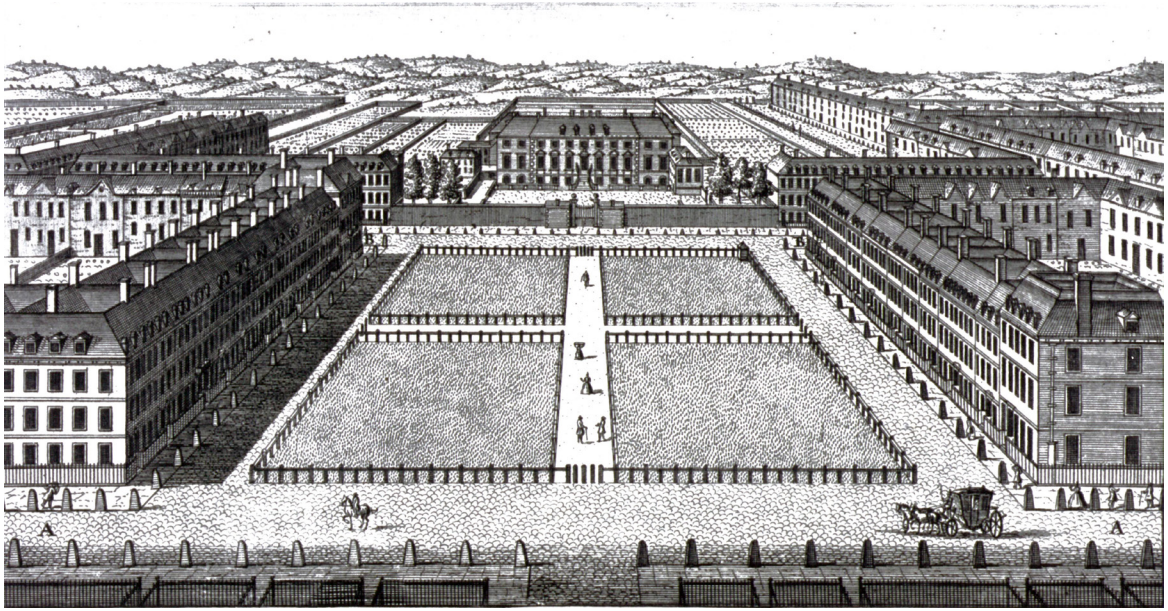
During the latter half of the nineteenth century, the unlawful conversion of large townhouses into various commercial uses became endemic to such an extent that by 1892 the steward of the Bedford Estate had come to regard whole streets, such as Montague Place, as a lost cause. Three major railway stations, London Euston (1837), Euston Square (1863), and Russell Square (1906), were built around the edge of Bloomsbury and with the advent of the railways, large-scale hotel, educational and office redevelopments began to appear by the turn of the 20th century.

Bloomsbury's reputation as a fashionable, residential suburb for the upper-middle classes evaporated during the early 20th century. The first major redevelopments were largely associated with the expansion of the University of London. Bloomsbury experienced widespread destruction during the Blitz, which led to the loss of large areas of its older housing stock **[Plate 2.5]**. After the Second World War, the areas of greatest destruction underwent major redevelopment, comprising a mix of social housing and offices.

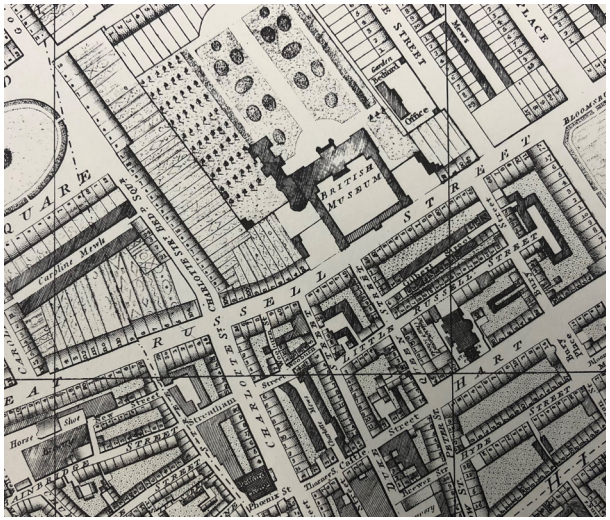


2.1 *Morgan's map of 1682 showing Montagu House in place*

1 London Borough of Camden, Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011), p. 5.

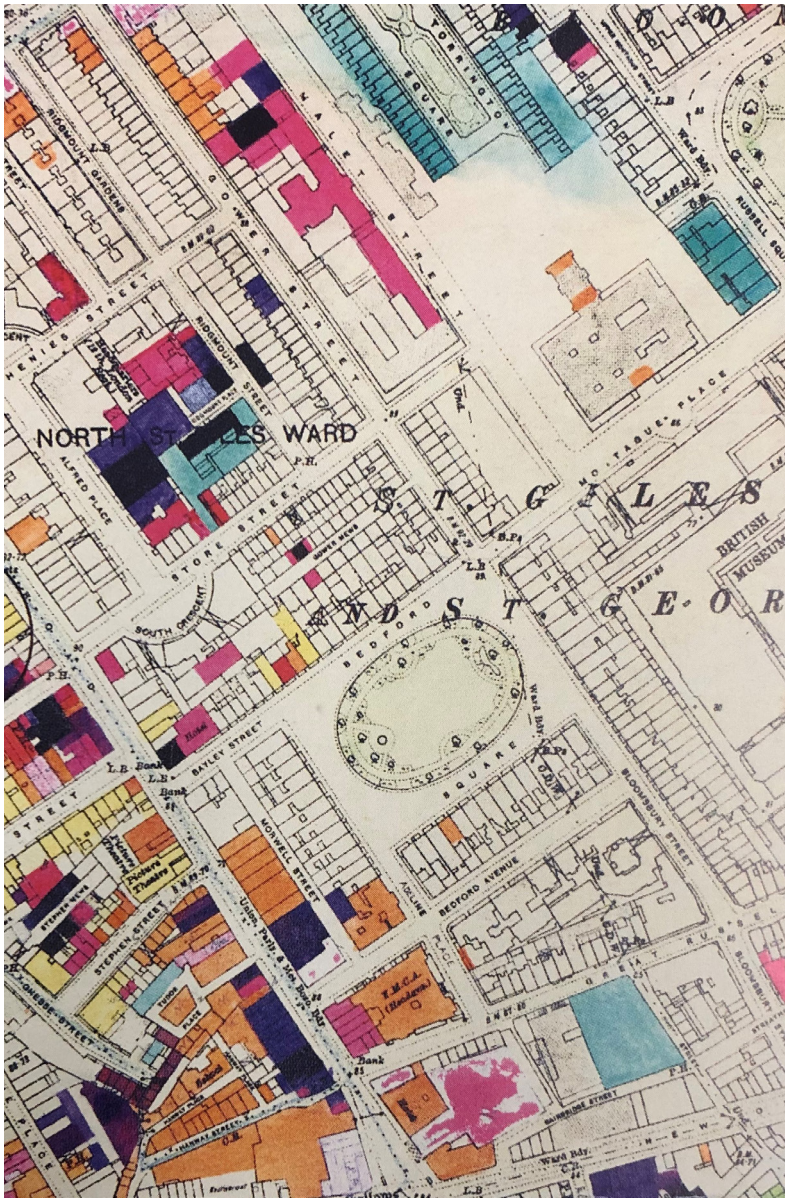


2.2 *Simplified view of Bloomsbury Square from the south, by William Angus, c.1750, British Museum site to the left (top) (London Metropolitan Archives).*



2.3 *Horwood's map of London 1792-9*

2.4 *1895 Ordnance Survey Map (National Library of Scotland)*



2.5 *LCC Bomb damage map showing war damage*

2.2 The Building

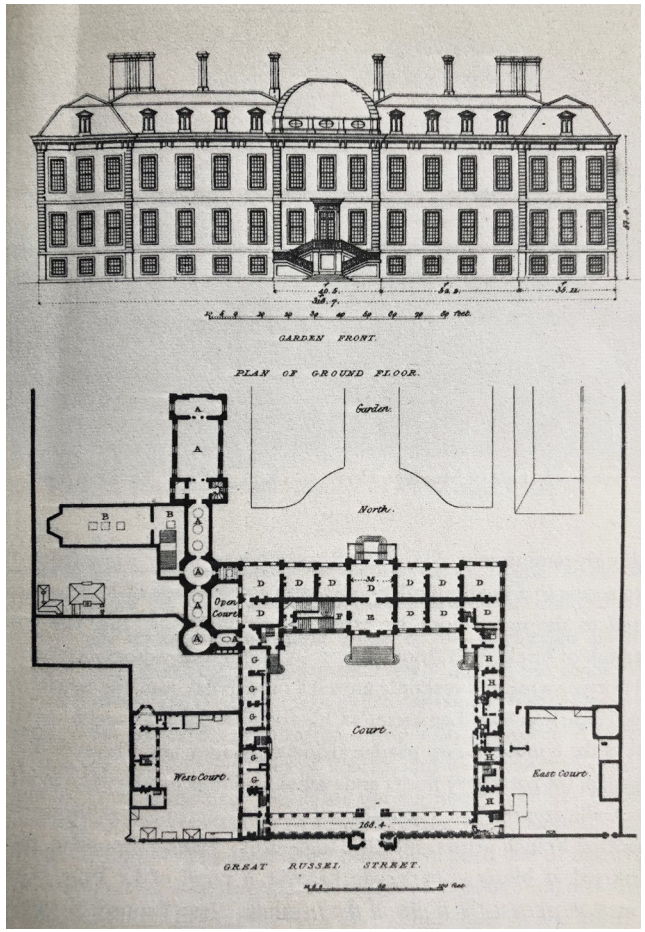
2.2.1 Montagu House

The British Museum has its roots in the donation of a number of private collections to the state. The collections included artefacts and books but also natural history specimens, reflecting the growing interest of the eighteenth century Enlightenment in both antiquarianism and science.

Sir Robert Cotton (1570–1631) amassed an outstanding collection of mediaeval manuscripts which were donated to the state after his death in 1700. No permanent home was found for it, and after a fire in 1731 which partly destroyed the collection the House of Commons instigated a search for a new suitable location. This search was intensified in 1753 when Sir Hans Sloane's (1669–1753) outstanding collection of artefacts and natural history specimens came to the market and was purchased by Parliament; this is generally seen as the most substantial and important foundation stone of the British Museum's historic collection. A third collection by Robert Harley, the Earl of Oxford (1661–1724) consisted of a vast array of books, medals and paintings which was also bought by the House of Commons.

In 1753 it was decided by Act of Parliament that a British Museum should be created, based on those collections. A state lottery was set up to collect the necessary funds, £300,000. Rather than construct a new museum, it was considered more economical to convert an existing building for this new function. The choice fell on Montagu House in Bloomsbury, a mansion in the French style of 1680 and 1686 (following a restoration after fire damage) which belonged to the Earl of Halifax **[Plate 2.6]**. In 1759 after some refurbishment work the British Museum in Montagu House opened to the public, but access was restricted to certain days and hours of the week, and was at the discretion of the museum's librarians. The varied collection displayed there included 'oriental idols, marble busts, elephants and sponges; polar bears, portraits, fossils and meteorites; Roubliac's statue of Shakespeare, Chantrey's statue of Banks, and several stuffed giraffes' in the entrance hall, and then collections organised in three departments, manuscripts, medals and coins; natural and artificial productions; and printed books, maps, globes and drawings in the rest of the building.

The collection was enlarged mostly through private donations, and occasionally though public money given by Parliament. In 1808 Montagu House was extended with a new wing designed by George Saunders to house fourth department, antiquities, named after a donation of Roman and Greek antiquities by Charles Townley. But this extension proved insufficient almost immediately, when in 1814–6 the Elgin Marbles and Phigalean Marbles were added to the collection. More bequests or artefacts and natural specimens flooded in in the 1820s, and, together with the newly donated Royal Library of George III they were so copious that it was clear that Montagu House was simply too small.



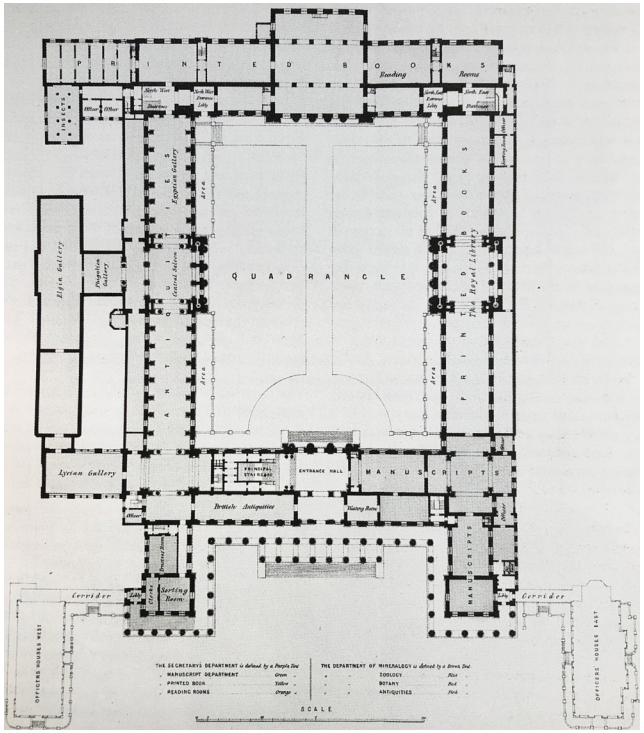
2.6 *Montagu House, elevation and plan (Mordaunt Crook)*

2.2.2 Smirke's Replacement Building

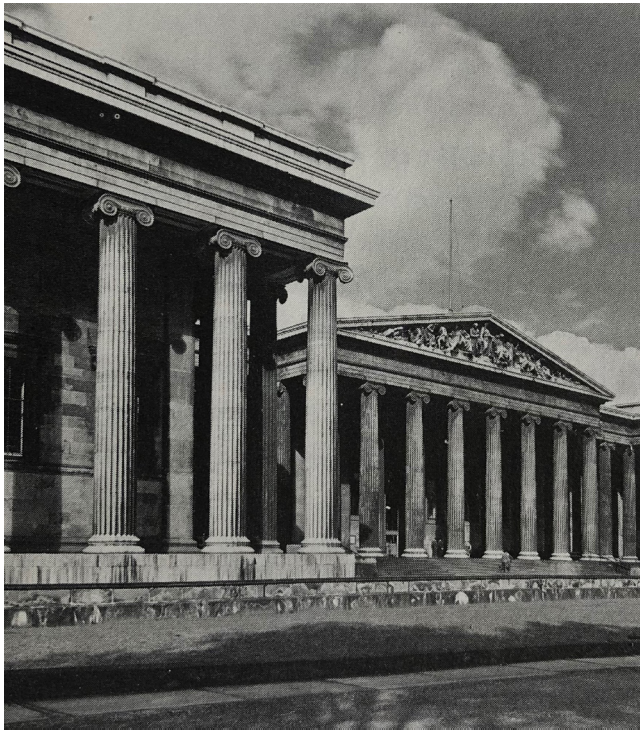
The architect for the replacement building of Montagu House was Robert Smirke (1780–1867), a well-connected Tory and the favourite man of his era, who was overseeing many public building projects for the Office of Works alongside his famous elders Nash and Soane. His prolific oeuvre included a vast number of churches, country houses, clubs, castles and public buildings. Smirke's skills also reached into more peripheral areas of design: he revolutionised structural systems in architecture and essentially invented quantity surveying. Stylistically he tried his hands at several of the then fashionable styles, but his Gothic architecture was unconvincing and it is his Greek buildings which were more successful. Greek Revival was the favoured style for new museums in the early nineteenth century, with many 'temples of the arts' created at that time, and Smirke was therefore well suited to the task and the taste of the era.

Smirke was appointed in 1820 to begin work on a new British Museum as the museum fell under the auspices of the Office of Works where Smirke oversaw new buildings. Initially Smirke proposed two new northern wings to Montagu House, but by 1823 a full replacement building, to be constructed in phases, was presented to the Treasury. This design, with a cour d'honneur with a giant-order ionic colonnade on the south side and a quadrangle arrangement beyond, sitting behind retained Georgian houses to the east, west and north which belonged to the Bedford Estate, was built between 1823–52, with Montagu House fully demolished only in 1847. The slow construction progress was largely due to government funding shortages, and meant that visitors to completed elements of the building had to put up with noise and disturbance. The King's Library in the east wing was finished first in 1829, and construction then progressed to the west wing to house the Elgin Marbles, and then came the north wing, with the southern front range coming last in 1841-8. Smirke retired in 1846 and the completion of the building was left to his younger brother Sydney Smirke and his son, Sydney Smirke Jnr.

When the museum was finally complete it was painfully out of fashion **[Plates 2.7 and 2.8]**; Greek Revival was firmly out, and Smirke was criticised for the museum's stylistic failings, but also its formulaic planning and the advantages Smirke had had because of his strong links to influential politicians and backers. Nevertheless, Smirke received the RIBA Gold Medal for it in 1853, and his work has since been re-evaluated as a nationally important example of English Greek Revivalism.



2.7 *1852 ground plan for British Museum as built (British Museum Collections)*



2.8 *Undated view of south front of the British Museum (Mordaunt Crook)*

2.2.3 Alterations and Extensions in the Nineteenth Century

The books collection of the British Museum was firmly part of the original collections, and it grew substantially to become the largest in Europe over the course of the nineteenth century. This expansion was driven by its librarian, Sir Anthony Panizzi (1797–1879). Panizzi was instrumental in enforcing the copyright Act which required publishers of British books to deposit a copy of each new publication at the British Museum, and he drove the acquisition of foreign books. This meant that the Museum's reading rooms in the north wing became too small, and Panizzi therefore instigated the construction of a new space: the circular reading room. There was a competition, involving Charles Barry and Sydney Smirke, and much debate ensued as to whether or not the library should be placed into the empty quadrangle. The advocates of using filling the space won out, and from 1854 to '57 a new circular building to designs of Sydney Smirke with a vast span held by cast iron ribs was built in the quadrangle, surrounded by innovative iron bookstacks. The bookstacks were removed as part of the Great Court project in 1998, after the books had been relocated to the newly-built British Library at St Pancras.

Additions in the later nineteenth century followed against the background of a serious space shortage caused by an influx of acquisitions. They were the Mausoleum Room and the White Wing, built in the 1880s to designs by John Taylor of the Office of Works. In the meantime, Sydney Smirke suggested more radical enlargement, such as a third story above the original museum, and building around the quadrangles, none of which came to pass.

Twentieth-century alterations followed an essential pattern of infilling the existing gaps in the plan. The major pre- and inter-war additions were the King Edward VII Galleries (1907–1913) and the Duveen Gallery (1936–38). After the war there was much work to repair war damage, which resulted in some remodelling. In the 1970s there were extensive works behind the west (Director's) corridor, with the construction of the New Wing in 1975–8. The culmination of the twentieth-century works was the Great Court project (consented in 1998), which removed all the remaining bookstacks and reimagined Smirke's central courtyard as an interior space under a large glazed roof, surrounding the retained central reading room.

2.2.4 The East Residence, Connecting Corridor and Later Additions

The east residence is part of Robert Smirke's original design, but was constructed by Sydney Smirke in 1846–7 as housing for some of the museum's principal officers, and is connected to the principal colonnade by a single-storey corridor. It was designed as four separate houses with interlocking but not connecting plans, each with its own entrance and staircase: three of these entrances open directly to the exterior, on the east, south, and west sides, but the entrance to the grandest house at the north end of the block is in the centre of the connecting corridor, facing the forecourt to the south. This house was intended for the principal librarian, and the corridor gave him direct covered access to the part of the museum originally given over to the book collections. On its north elevation, the Principal Librarian's House has a full-height canted bay window, which originally looked out onto gardens to the north; the corridor elevation, however was always blank to this side. The addition of the White Wing in the 1880s created an awkward and narrow space between its south elevation and the earlier north elevations of the east corridor and the east residence. This space is not publicly visible except from a short section of Montague Street, and has developed a service character. A single-storey addition was made to the north side of the corridor in the 1960s to house a day room and kitchen for the security team.

At the north side of the corridor, where it joins the main building, is a single-storey room, with an awkward lobby to the north beyond. This room is very likely the remaining part of the single storey additions made by Sydney Smirke on the east side of the museum in 1849 to provide more space for the library. Most of these additions were removed when the White Wing was erected in the 1880s.

2.3 Patent Slating

Of all the traditional vernacular systems of laying slate on roofs, single lapping is perhaps the simplest, and certainly the most economical. It involves laying slates in courses so that each slate only overlaps the one below, resulting in columns of overlapping slates with vertical open butt joints between them. This system has the advantage over double- or triple-lap slating of requiring fewer slates to cover the same roof area (especially important when the slates are large); its disadvantage, however, is that the vertical butt joints between the slates need to be made watertight. In vernacular roofing traditions there are essentially two methods that have been developed to achieve this: either to lay thin strips of slate over the joints (dry-laid

or bedded), a technique seen in Scandinavia, Orkney, and Ireland; or to lay slate soakers under the joints, as is done in Caithness.[2]

Single-lap slating is not traditionally native to the south-west of England; there is, however, the tradition of rag slating, which uses very large slates fixed directly to the rafters. It is suggested that this method inspired Charles Rawlinson of Lostwithiel, Cornwall, to invent a method of single-lap slating in the late eighteenth century, which he patented in 1772.[3] Rawlinson's patent method involved bedding slates of a regular width into rebates cut into the upper face of common rafters, and securing the joints with a narrow 'capping-slate', fixed to the exposed strip of common rafter with screws. The water-tightness of this method relied heavily on the cement used to bed the slates into the rafters, for which Rawlinson gave three different recipes for use in different situations. Rawlinson's explicit aim was economy and efficient use of materials: he claimed that his patent roofing method required 'about half the weight of slates, and not more than two thirds of the timber, commonly made use of.'[4]

How successful Rawlinson was at enforcing his patent is unclear, but his system or something like it seems to have become a relatively popular innovation at the beginning of the nineteenth century. The Penryn slate quarries were apparently producing patent slates by 1788, and patent slate roofing was being promoted by the Wyatt brothers, the eldest of whom (Benjamin) was Lord Penryn's land agent.[5] In the second decade of the nineteenth century Thomas Rickman and the ironmaster John Cragg used patent slating to roof their three pioneering iron-framed churches in Liverpool, fixing the slates directly to the iron rafters. Whilst the church of St Philip (1815–16) was lost later in the nineteenth century, the churches of St Michael, Aigburth (1814), and St George, Everton (1812–14) both survive, along with their patent slate roofs.[6] A later patent of 1833 by William North suggests that patent slating remained of interest for several decades, and that architects experimented with different methods of waterproofing and different materials for the underlying structure – North's scheme involves grooved slates which fit underneath the butt joints, and mentions explicitly both timber and iron rafters.[7]

Although the available information is scanty, it seems that many architects experimented with patent slate in the first half of the nineteenth century, including Charles Barry, who used a version of the system at both the Reform Club (1837–41) and at the Palace of Westminster (1830–1860). The perceived advantages of this system bear repeating: Nicholson, in his 1819 article on slating, states that patent slating 'allows of being laid on a rafter of much less elevation than any other kind of slate, and is considerably lighter by reason of the laps being less than is necessary for the common sort of slating.'[8] He goes on to assert that 'the patent slating may be laid so as to be perfectly water-tight, with an elevation of the rafters considerably less than for any other slate or tile covering; a rise of two inches in each foot of the length of the rafter being deemed sufficient.'[9] Although the shallow pitch allowed by the system is undeniable, the possibility of making patent slate roofs perfectly water-tight is less certain, and it seems to have fallen out of use in the second half of the nineteenth century.

2.4 Architect Biographies

Biographies for Sir Robert and Sydney Smirke are given in the 2008 CMP.

2 The Stone Roofing Association, 'Slate Lapping Systems', http://www.stoneroof.org.uk/historic/Historic_Roofs/Slate_lapping.html, accessed 18/4/23.

3 Terry Hughes, *Slating in South-West England: SPAB Regional Technical Advice Note* (London: Society for the Protection of Ancient Buildings, 2016), p. 8.

4 Charles Rawlinson, *The Directory for Patent Slating* (Lostwithiel: printed by the author, 1772), p. iv.

5 David Gwyn, *Welsh Slate: Archaeology and History of an Industry* (BLAH), p.44; Peter Nicholson, in his *An Architectural Dictionary* (London: J. Barfield, 1819) attributes the invention of patent slating to 'Mr. Wyatt, the architect', and gives a description of the method of patent slating (article on *Slating*, pp. 700–704).

6 The roof at St George's was renewed in 2016 – see http://www.stoneroof.org.uk/historic/Historic_Roofs/Everton_2.html; the roof at St Michael's was renewed in 2007.

7 See http://www.stoneroof.org.uk/historic/Historic_Roofs/Patent_slating.html for a transcript of North's description.

8 Nicholson, p. 701.

9 Nicholson, p. 702.

2.5 Relevant Planning History

2019/5569/P and 2019/5640/L
Full planning permission and listed building consent granted December 2019

Roof alterations, including 'replacement lead roof over contractors' desk, replacement copper roof of the east advancing wing with copper roof'. These works are misnamed, but concern in part the roofs dealt with here. The materials of the slate roofs are misidentified in these applications.

2.6 Sources and Bibliography

Published Sources

Caygill, M, and C. Date, *Building the British Museum* (London: British Museum Press, 1999).

Cherry, Bridget, Nikolaus Pevsner, *London 4: North - Pevsner Architectural Guides: Buildings of England* (London: Yale University Press, 1998).

Crook, J Mordaunt, *The British Museum: A Case Study in Architectural Politics* (London: Pelican Books, 1973).

Gwyn, David, *Welsh Slate: Archaeology and History of an Industry* (Aberystwyth: Royal Commission on the Ancient and Historical Monuments of Wales, 2015)

Hughes, Terry, *Slating in South-West England: SPAB Regional Technical Advice Note* (London: Society for the Protection of Ancient Buildings, 2016)

Nicholson, Peter, *An Architectural Dictionary* (London: J. Barfield, 1819)

Rawlinson, Charles, *The Directory for Patent Slating* (Lostwithiel: printed by the author, 1772)

London Borough of Camden, Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011).

The London County Council Bomb Damage Maps 1939–1945 (London: Thames and Hudson, 2015).

Online Sources

https://buildingconservation.com/articles/patent-slating/patent-slating.html

Oxford Dictionnary of National Biography (https://www.oxforddnb.com/)

http://www.scottisharchitects.org.uk

http://www.stoneroof.org.uk/historic/Historic_Roofs/Patent_slating.html

Unpublished Sources

Purcell Miller Tritton: The British Museum, Conservation Management Plan (2008)

3.0 Site Survey Descriptions

Given that the proposals concern only the roofs of a small part of the building, which are invisible from all public points of vantage, this section will focus on only these aspects, and deal only with the exteriors. The three modern flat roofs (B/2/X01, B/2/X02 and B/2/X03) make no contribution to the significance of the building and are described and illustrated in the Design and Access Statement by Nex Architecture; they are not discussed further here.

3.1 The East Connecting Corridor

3.1.1 Context

The main public entrance to the British Museum is on the south side of the building, and addresses Great Russell Street which runs along the south edge of the Museum's site. The building stands well back from Great Russell Street, behind monumental cast-iron railings and an expansive forecourt. This forecourt is defined centrally by the wings of the main building which project, and effectively bounded to the east and west beyond these projections by two rectangular pavilion blocks oriented essentially north–south, both part of the original design, and intended as residences for the museum's principal officers. These blocks are connected to the main building by low connecting corridors.

The eastern connecting corridor links the principal colonnade of the museum with the east residence. The main part of the British Museum is expressed on the south side as a very large single storey set on a monumental plinth, with an Ionic colonnade supporting a full (if plain) entablature. The east residence is similar in height, but of a different scale of articulation: it is expressed as three storeys (two full height, with a half-storey above), set within a frame of giant order pilasters above a sunken basement. The connecting corridor negotiates between these two elements: it is a single storey of the same scale as the east residence, but shares something of the monumental plainness of the walls and plinth of the main part of the building.

3.1.2 Building: Eastern Corridor, South Elevation.

The eastern corridor is one storey high, above a sunken basement within a lightwell. It is of five bays: two windows in simple lugged architraves either side of a central door under a projecting canopy supported on console brackets. The door is reached by a wide set of stairs which span the basement lightwell, with solid balusters to either side terminating in low square piers surmounted by tall cast-iron lamp standards. The balustrade to the basement lightwell to either side has stone panels pierced by openings with semi-circular arches both top and bottom, which return to the east and continue around the basement lightwell of the east residence. Apart from the window and door surrounds the wall of the corridor is plain ashlar, unarticulated by any other features; above is a projecting moulded band below a plain solid parapet, decorated only by a small moulding under the coping. **[Plate 3.1]**

3.1.3 Building: Contractors' Room and Lobby

To the north of the eastern corridor where it meets the main building is a single storey addition. The visible elevation (east) is of stock brick, with a flat parapet coped with stone. It is likely that this is the surviving south end of a long single-storey addition made to the east elevation in 1849 and truncated when the White Wing was built — the brickwork of the eastern wall shows clear signs of alteration, and entirely lacks the queen closers present elsewhere. The internal space has an awkward staggered plan form, with a lobby to the north-west which gives access to B/2/017 in the main part of the museum, lit from above by a skylight.

3.1.4 Building: Eastern Corridor, North Elevation and Spaces to the North

The north side of the eastern corridor is partly obscured by later additions at the ground floor, but where visible above is of white-painted brickwork above a plain section of rendered wall, also white painted. Against the north wall of the corridor at ground floor is a modern single-storey flat-roofed building in stock brick (stretcher bond), with three modern windows and a metal railing guarding the roof. Because the north elevation of the corridor is hidden from public view, it has been used extensively for service runs, mainly cables, which travel between the east residence and the main part of the museum in metal trays running over the flat roof of the modern extension. The north side of the space is defined by the south elevation of the White Wing, not further discussed. To the west end there is a cross-wall of white glazed bricks topped with a high iron fence; behind this wall is another small modern addition with flat roof supporting services (ductwork, cable runs). **[Plate 3.2]**

3.1 *East Corridor*

3.2 *Area to the rear of the east corridor*

3.2 The Roofs (B/3/X03 and B/3/X04)

As detailed in the documents supplied by Nex, these roofs are both a kind of patent slate construction, with very large slates laid almost flat, butt-jointed, with copper flashing above and slate strips below, to waterproof the joints. They have both been covered over at some point or points in the twentieth century to provide additional water-proofing. The methods of construction are similar, but slightly different (see below for details).

3.2.1 Roof above Contractors' Desk (B/3/X03)

The roof is of two parts; to the south, there is a dual pitched section; to the northwest there is a smaller section with a skylight above the lobby (see 3.1.3 above), which falls towards the east wall of the main south-east wing. The spaces below are very likely to be the remaining southern end of a long single-storey addition to the east side of the main building, made in 1849. The roof is arranged so that, if continued to the north, the ridge would be central; it seems clear that the roof did once continue in this way, and was truncated to accommodate the building of the White Wing, especially the western-most window on the principal floor.

The slates of the roof above the Contractors' Desk are supported on slate joists running north–south; these bear into the masonry of the walls at the north and south ends, and are supported in the centre by an iron beam which spans the space east–west. The ceiling is lath and plaster, supported on timber joists which bear on the bottom flange of the iron beam and on battens fixed to the masonry. The skylight above the lobby has a well lined with lath and plaster on a timber frame cut to accommodate the slate joists; the location of the skylight, as well as the constructional details, suggest that it was inserted in the nineteenth century, possibly when the single-storey addition was truncated. The skylight frame itself appears modern. The roof has been covered with bituminous covering applied directly to the slates, which has failed.

3.2.2 East Corridor Roof (B/3/X04)

This roof has three pitches, all very shallow. The main part of the roof covers the corridor, and falls gently and symmetrically from a short ridge which spans the corridor behind the central entrance door. To the west, the smaller section between the end of the corridor and the east wall of the main body of the museum falls to the east. These roofs are slate, but have been covered with a thick (up to 85mm) screed, and a 20mm asphalt covering. Given the content of the screed it seems likely that it was applied at some point in the nineteenth century, presumably in an effort to prevent water ingress through the slates. The slates are supported on slate joists that span between the walls of the corridor.

Below is a ceiling of stone panels (almost certainly slates as well) which also span between the walls, with thin stone or slate strips covering the joints above. These two elements are structurally independent along the length of the corridor; at the west end, however, the roof slates are supported on small piers of un-mortared brick which bear directly on the ceiling below. This may be an original expedient, or it may be an early alteration, perhaps associated with the construction of the 1849 single-storey addition to the north, which may have disturbed the joists where they met the north wall.

4.0 Assessment of Significance

4.1 Introduction

The purpose of this section is to provide an assessment of significance of the low-level roofs above the east linking corridor and associated additions, so that the proposals for change to the building are fully informed as to its significance and so that the effect of the proposals on that significance can be evaluated. These roofs are invisible from all public points of vantage, and have no relation to the building's setting or the wider conservation area. The assessment below therefore focusses exclusively on the roofs and their direct contribution to the significance of the building.

4.2 Assessment of Significance

4.2.1 The Roofs in the Context of the British Museum as a Whole

The roofs which are subject to these proposals are a mixture of dates and materials. The roofs above the twentieth-century additions (B/2/X01, B/2/X02 and B/2/X03) can be dealt with immediately — they are modern fabric of low quality and make no contribution to the significance of the building.

The roofs above the corridor and the Contractors' Desk with lobby to the north-west (B/3/X03 and B/3/X04) are from relatively early in the museum's development: the east corridor (B/3/X04) is part of Robert Smirke's design and was built by his brother Sydney in 1846–7; the Contractors' Desk is very likely part of an addition made by Sydney Smirke in 1849. They are both patent slate, a relatively rare method of roof construction in vogue in the first half of the nineteenth century, which has historically proved problematic. They have significance both as examples of unusual roofing techniques and for the contribution they make to the architectural value of the building as a whole.

The east corridor is part of Robert Smirke's original design and plays an important role in the articulation of the principal public façade of the British Museum. Its scale and detailing are carefully pitched to negotiate between the cyclopean scale of the central block and the more domestic articulation of the East Residence. It is a deliberately plain addition, with a dead-flat parapet. The roof is intended to be invisible to the public, and makes no direct contribution to the effect of the composition; the possibilities afforded by the patent slating for a very shallow roof pitch, however, are important in enabling the proportions of the south elevation, and so make a small contribution to the effect of the elevation. The corridor is indicated as having 'very high' significance on the significance plans which accompany the 2008 CMP.

The part of the building containing the Contractors' Desk is likely a remnant of an early addition to the eastern elevation of the building, built in 1849 to provide more space for the growing book collection. The east elevation of the museum was always utilitarian, not designed to be visible to the public, and constructed from brick. *Ad hoc* additions were made almost immediately, and continued to be made throughout the building's later history. The single-storey addition of which the Contractors' Desk was a part was mostly removed when the White Wing was constructed, meaning that the small section of east elevation between the south face of the White Wing and the ashlar-clad south façade of the main building is particularly confused. It is indicated as having only 'high' significance on the CMP significance plans. The roof is hidden behind a parapet from all public locations, and makes no contribution to the effect of the elevation. Again, however, the shallow pitches possible with patent slating allow this roof to fit under the cill of the large window in the main east elevation of the museum.

Although the use of patent slating was not absolutely innovative by this point, the use of slates in this way was still a matter for experimentation, and Sydney Smirke's employment of the material for both roof covering and joists, as well (probably) as a ceiling material in the corridor, reflects his innovatory streak. The 2008 CMP explicitly mentions the surviving slate roofs at the British Museum, stating that the 'few surviving roofs which are of slate construction are of particular interest', and setting these roofs in the context of Smirke's 'attention to the need for fire-proof construction'. The CMP explicitly identifies the roof above the Contractors' Desk as one of only two Smirke slate roofs remaining, stating that all the other slate roofs, including that over the Director's corridor, have since been lost. This is an error (understandable, given the thick screed): the CMP does not mention the roof of the east corridor at all, which should be included in any future catalogue of the slate roofs at the British Museum. The CMP also states that 'in some instances roofs were fire-proofed by the use of slate or stone ceilings supported by cast iron, as over the Director's Corridor' but, again, does not mention the slate or stone ceiling in the east corridor.

In this context it is clear that the two slate roofs which are the subjects of the proposals are of interest as rare survivals of Sydney Smirke's original roofing strategy. The shallow pitches enabled by the slating technique allows the fireproof construction of almost flat roofs,

which in turn enables the expression of the elevations. The roofs make a high contribution to the significance of the museum as a whole as part of its surviving early fabric and through their association with one of its major architects.

Given the nature of the proposals (discussed below), it is important for the assessment of significance to be as fine-grained as possible, so that the harms and benefits of the proposals can be accurately assessed. Concretely, this entails addressing the relative significance of the different elements of the roofs and ceilings.

4.2.2 Roof B/3/X03 (Contractors' Desk and Lobby)

In the case of roof B/3/X03, the roof slates are supported on slate joists, which bear into the masonry walls at either side and are supported in the centre by an iron beam (please refer to the illustrative section prepared by Nex for details). The ceiling is of traditional lath and plaster construction, supported on timber joists which span between the iron beam and the masonry walls to either side. Although the ceiling is itself historic (possibly dating to the construction of this part of the building in 1849, but much more likely later), its construction is commonplace, and its relative significance in the context of the building is low; the relative significance of the iron and slate construction above, however, is high. The skylight is modern fabric, and makes no contribution to significance, but the lath and plaster around the well indicates that the position of the skylight is either original, or dates from the truncation of the East Addition in the late nineteenth century.

4.2.3 Roof B/3/X04 (East Corridor)

The relative significances of roof B/3/X04 and its ceiling are harder to determine. The construction of the roof covering itself, under its screed, is similar to that of B/3/X03: the slates are supported on slate joists, which appear to bear directly into the masonry walls on either side of the corridor. No evidence has been found here of iron beams, although the opportunities for survey have been limited. The ceiling is independent of the roof, and is slate or stone slabs which span the space between the masonry walls, with additional narrow slate joists above the joints. At the west end it appears that at least some of the roof slates are supported on piers of brick, laid without mortar, which bear directly on the ceiling slabs — an unusual, not to say risky, method of construction.

Over the east corridor both roof and ceiling have significance as surviving examples of Sydney Smirke's innovative use of slate. The slates of the roof are concealed under a thick screed, but nonetheless survive, possibly substantially as built. The slates of the ceiling are painted, but otherwise appear not to have been altered in any way. In the context of the building as a whole, which element — roof or ceiling — makes the greater contribution to significance is a matter of fine judgment. It should be noted that most of Sydney Smirke's other patent slate roofs have been lost, which means that the roof structure here has value as a rare surviving example. In particular, the equivalent roof over the Director's Corridor to the west was lost as part of the works in the mid-1970s, so the existing roof to the east corridor is now the sole evidence of the original arrangement. The survival of slate ceilings around the museum more generally is unclear, but the slate ceiling of the Director's Corridor is certainly extant, at least at the west end (room C/2/22). The construction of this ceiling is slightly different from that in the east corridor, with the joints between the slate slabs being supported by the flanges of inverted iron T-beams, but the principle is the same; hence, whilst the slate ceiling to the east corridor has the advantage of being substantially complete and unaltered, it is not the sole survivor of this kind of slate ceiling construction. The evidential value of the difference between the two construction methods is unclear: the ceiling in the Director's Corridor is slightly earlier, and it may be that in the course of construction Smirke determined that the iron beams were an unnecessary addition (certainly, as the ceiling slabs are currently supporting the roof at the west end of the east corridor, it seems that the slate needs no structural reinforcement). It may also be that the iron beams were omitted for some other, practical reason, and that their absence is not evidence of any design decision. In any case, the iron and slate construction in the Director's Corridor is representative of a definite innovation, where the simple laying of slabs between masonry walls is not.

On balance, and given the relative survival of slate roofs and comparable slate ceilings across the building as a whole, it is the roof structure of B/3/X04, rather than the ceiling below, which makes the greater contribution to the significance of the building.

5.0 Commentary on the Proposals

5.1 Description of the Proposals and their Impact on the Listed Building

The proposals for the five roofs between the east corridor and White Wing of the British Museum are outlined in the drawings and Design and Access Statement by Nex. Externally, the proposals include renewing the roof coverings with new waterproof membranes or felt, with the addition of insulation; internally, the proposals include the removal of existing ceilings (both lath and plaster and slate), the insertion of new timber structures to support the roofs above, and then the reinstatement of the ceilings with new lath and plaster and the original slate respectively. The proposals are described in detail below, with the impact on the listed building set out in italics.

5.1.1 Modern Flat Roofs

The proposals for the modern flat roofs (B/2/X01, B/2/X02 and B/2/X03) are essentially for like-for-like replacement, with the addition of insulation above. Two of the roofs are of timber construction, and it is proposed to repair and replace the joists where necessary; the other is a concrete slab and it is proposed to repair the screed where necessary. All roofs will be recovered with a layer of insulation and a new felt covering. A new clip-on mansafe system will be installed on roofs B/2/X01 and B/2/X02, whereas on B/2/X03 the existing safety rail will be replaced like for like.

Given that the existing roofs make no contribution to the significance of the building, no harm will be caused. The renewal of these roofs is necessary to prevent water ingress, which could harm the fabric of the historic building, and should therefore be considered beneficial; the provision of better insulation will afford a small improvement to the performance of the building envelope overall, which should similarly be considered a benefit. It is also proposed to replace and rationalise some of the plant and cable runs which are supported by these roofs; whilst this will not provide any direct visual improvements (the material is anyway invisible from almost all public points of vantage), it will serve to remove clutter which in turn will help the ease of maintenance of the building envelope. The provision of new mansafe systems where there are none, and replacement railings where they already exist will also facilitate easy and safe maintenance of the museum's systems, which will support the building's long term optimum viable use.

5.1.2 Historic Patent Slate Roofs

The proposals for the patent slate roofs (B/3/X03 and B/3/X04) are more complex. The difficulties that need to be addressed are concerns about the strength of the roofs under live loads (maintenance access), their thermal performance, and water ingress, which is causing some harm to the fabric of the building.

The structural capacity of these roofs is not well understood. Patent slate roofs are rare, and their structural limitations have therefore not been widely studied; they were also originally — and remained — a novel form of construction, subject to great variation of detail and *ad hoc* experimentation. The variations seen in the equivalent ceilings of the Director's Corridor and the east corridor illustrate the situation more generally: here, two ceilings, made of the same material and put up within a few years of each other under the control of the same architect, were nonetheless constructed in noticeably different ways. The characteristic variety of design is compounded in the case of the British Museum roofs by the presence of some utterly expedient details of construction; the un-mortared brick piers at the west end of roof B/3/X04, which apparently transfer the loads of the roof directly to the ceiling slabs below, may have been inserted at the time of construction or as part of a later repair, but in any case make the load-bearing capacity of the roof hard to quantify. Given that some plant is currently located above this part of the roof (although it bears on an independent metal deck), and that in general access for maintenance across all the roofs is operationally desirable, more structural certainty is required.

With respect to water ingress, the behaviour of patent slate roofs is in general problematic. Although the body of available knowledge is not large, evidence collected from various sources suggests that making patent slate roofs watertight has always been difficult. The nature of the construction means that the joints rely heavily on the bedding mortar and whatever arrangement of soakers or covering strips used (whether slate or lead or copper, etc.) to remain watertight. Historically, the bedding mortar tended to become brittle after some years and fail, and no entirely satisfactory arrangement of coverings for the joints was ever firmly established. The addition of the screed and asphalt to the roof above the corridor (B/3/X04) indicates a historic attempt to alter the roof, likely in response to water ingress, which has in turn itself failed.

Similarly, no entirely or universally satisfactory modern methods have been developed for repairing or relaying patent slate roofs. It must be noted that the performance of such roofs varies depending on their

pitch: the steeper the roof, the better the performance, and some success has been achieved in relaying the slightly more steeply-pitched roofs at the church of St George, Everton, where the joints between the slates were sealed with expanding foam weatherproofing tape. This and similar techniques have been tested extensively for flatter roofs as part of the ongoing works at the Palace of Westminster, however, and have failed to guarantee water-tightness.

Bearing all this in mind, it is proposed firstly to support the roofs from below with new timber joists bearing on timbers fixed to the masonry of the walls. To construct this additional structural framework it is necessary to remove the ceilings below, both lath and plaster and slate. After the works to the underside of the roofs have been completed, the lath and plaster will be recreated like-for-like on the original joists (depending on condition). The slate ceiling will then be reinstated using the original slates, or new slates to match in case of damage. Secondly, it is proposed to cover the roofs from above with a new build-up, including a layer of insulation, under a cold-applied roof membrane. The build-up will need to be bonded to the historic roof, but care will be taken to use as low tack a bonding agent as possible, to allow for later removal and to avoid damage to the historic converings. Care has also been taken in the proposed design to ensure that the build-up on roof B/3/X04 will not be visible above the corridor parapet, and that the vapour membrane which is the lowest layer of the new build-up will not be bonded to the slates. New clip-on mansafe systems will be provided to allow safe maintenance access whilst remaining invisible from points of public vantage. These systems will be fixed into the brickwork of the existing parapets to avoid any impact on the slate roofs. The skylight on roof B/3/X03 will be removed and replaced (retaining the structure of the historic upstands but renewing their lath and plaster).

On balance, these proposals will cause low to negligible harm to the significance of the building. A very minor amount of harm will be caused through the loss of the lath and plaster ceiling below B/3/X03, and there is a risk of further harm through damage to the slate ceiling below B/3/X04 in the course of dismantling it. However, the proposals will preserve the patent slate roofs themselves, whilst protecting the fabric of the building by preventing further water ingress and improving its thermal performance. They also aim to preserve the slate ceiling to the corridor, through careful dismantling and subsequent reinstatement. Whilst the slate ceiling makes a contribution to the significance of the building, the relative significance of the surviving slate roofs is higher; given the need to repair and structurally reinforce the roofs, the proposals to retain them in situ, reinforcing them from below and recovering them above is the least harmful option available, and will bring wider benefits through improvements to the building envelope, as well as to the arrangement of the plant. The proposed mansafe systems will allow safe access and will promote the ongoing maintenance of the building, supporting its optimum viable use as a museum. Care will be taken to ensure that the system is invisible from public points of vantage, which will preserve the integrity of the highly significant front elevation. Fixing the system into the existing masonry will cause no harm to the significance of the building, as the area of brickwork to be affected is very small, and makes a negligible contribution to the overall significance of the British Museum. Nevertheless, the fixings will if possible be into the mortar joints rather than the bricks themselves, to minimise the impact on the fabric. The existing rooflight (in roof B/3/X03) is a modern replacement of a historic form, and its replacement (to match) will cause no harm to significance.

5.2 Justification and Conclusion

The Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) sets out a duty by the decision maker to have special regard to the desirability to preserve listed buildings and their settings, and preserve or enhance the character or appearance of conservation areas (sections 16, 66 and 72 of the Act). This is reflected in the London Plan (policy HC1). The Camden local plan (policy D2) and the NPPF (paragraph 202) both allow for harm to heritage significance to be outweighed by public benefits, with the proviso set out in the NPPF that 'great weight' has been given to the conservation of affected heritage assets (paragraph 199), and that harm has been addressed with 'clear and convincing' justification (paragraph 200).

The most significant elements of the roofs affected by the proposals would be preserved, and there would be no harm to the setting of the British Museum or the character and appearance of the Bloomsbury Conservation Area. A very small amount of harm would be caused by the loss of a small area of nineteenth-century lath-and-plaster ceiling, and there is a risk that the slate ceiling to the corridor will be damaged in the course of dismantling. However, the proposals represent the least-harmful of the possible options, and are necessary to prevent further water ingress which is damaging the interiors. They will also allow future access to the roofs, which will promote the ongoing maintenance of the fabric, and will improve the thermal performance of the building envelope.

These public benefits outweigh the very small amount of less-than-substantial harm which will be caused to the significance of the British Museum. The proposals therefore comply with the Camden Plan (D2) and the NPPF (paragraph 202); as these are material considerations, this means that the requirements of the Act (sections 16, 66 and 72) and the London Plan (Policy HC1) are also met.

Appendix I - Statutory List Description

Official list entry
Heritage Category: Listed Building
Grade: I
List Entry Number: 1130404
Date first listed: 24-Oct-1951
List Entry Name: THE BRITISH MUSEUM

Statutory Address:
THE BRITISH MUSEUM, GREAT RUSSELL STREET
The building or site itself may lie within the boundary of more than one authority.

County: Greater London Authority
District: Camden (London Borough)
Parish: Non Civil Parish
National Grid Reference: TQ 30054 81721
Details

CAMDEN

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

GV I

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

Appendix II - Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72(I) of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

> *[...] 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.*

Similarly, section 66 of the above Act states that:

> *In considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be 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.*

Similarly, section 72(I) of the above Act states that:

> *[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.*

Local Policy

Camden Local Plan

The local plan was adopted by the Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough. The following policies are relevant:

Design

7.1 Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. The National Planning Policy Framework establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning.

Policy D1 Design

The Council will seek to secure high quality design in development. The Council will require that development:
a. respects local context and character;
b. preserves or enhances the historic environment and heritage assets in accordance with "Policy D2 Heritage";
c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
d. is of sustainable and durable construction and adaptable to different activities and land uses;
e. comprises details and materials that are of high quality and complement the local character;
f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
g. is inclusive and accessible for all;
h. promotes health;
i. is secure and designed to minimise crime and antisocial behaviour;
j. responds to natural features and preserves gardens and other open space;
k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
l. incorporates outdoor amenity space;
m. preserves strategic and local views;
n. for housing, provides a high standard of accommodation;
and o. carefully integrates building services equipment.
The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Excellence in design

The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under "Policy G1 Delivery and location of growth" will be provided through high quality contextual design.

Local context and character

7.2 The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:
- character, setting, context and the form and scale of neighbouring buildings;
- the character and proportions of the existing building, where alterations and extensions are proposed;
- the prevailing pattern, density and scale of surrounding development;
- the impact on existing rhythms, symmetries and uniformities in the townscape;
- the composition of elevations;
- the suitability of the proposed design to its intended use;
- inclusive design and accessibility;
- its contribution to public realm and its impact on views and vistas; and
- the wider historic environment and buildings, spaces and features of local historic value.

7.3 The Council will welcome high quality contemporary design which responds to its context, however there are some places of homogenous architectural style (for example Georgian Squares) where it is important to retain it.

7.4 Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. Character is about people and communities as well as the physical components. How places have evolved historically and the functions they support are key to understanding character. It is important to understand how places are perceived, experienced and valued by all sections of the community. People may value places for different reasons, often reflecting the services or benefits they provide for them. In addition, memory and association are also a component of how people understand a place. All of these values and experiences are part of understanding the character of a place. Planning applications should include a Design and Access Statement which assesses how the development has been informed by and responds to local context and character.

7.5 Design should respond creatively to its site and its context including the pattern of built form and urban grain, open spaces, gardens and streets in the surrounding area. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions and materials.

7.6 The Council has two sets of documents which describe the character and appearance of areas and set out how we will preserve or enhance them. Each conservation area has a Conservation Area Statement or Appraisal and Management Strategy. These detailed documents have been developed with the relevant Conservation Area Advisory Committee and are adopted supplementary planning documents. For areas outside of conservation areas the Council commissioned the Camden Character Study to identify and record their character. This is not a formal supplementary planning document. These documents can help developers to inform their understanding of the specific character of the area in which their proposals are located. "Policy D2 Heritage" provides further guidance on the preservation and enhancement of the historic environment. When assessing design, we will also take into account guidance contained within supplementary planning document Camden Planning Guidance on design. For areas where Neighbourhood Plans are being prepared, these documents will form a valuable source of information on the character of the local area.

Sustainable design and durability

7.7 The Council expects development to be sustainable in design and construction. Development should be consistent with the policies set out in section 8 of this plan on sustainability and also consistent with Camden Planning Guidance on sustainability.

7.8 Design should be durable in construction and where appropriate should be flexible and adaptable for a range of uses over time, a quality known as robustness. Robustness is influenced by factors including the size and shape of rooms, points of access and the depth of floorplates. The overall quality of a building is also a consideration as buildings with character and charm are more likely to be retained and adapted.

Details and materials

7.9 Architectural detailing should be carefully integrated into a building. In new development, detailing should be carefully considered so that it conveys quality of design and creates an attractive and interesting building. Architectural features on existing buildings should be retained wherever possible, as their loss can harm the appearance of a building by eroding its detailing. The insensitive replacement of windows and doors can spoil the appearance of buildings and can be particularly damaging if the building forms part of a uniform group.

7.10 Schemes should incorporate materials of a high quality. The durability and visual attractiveness of materials will be carefully considered along with their texture, colour, tone and compatibility with existing materials. Alterations and extensions should be carried out in materials that match the original or neighbouring buildings, or, where appropriate, in materials that complement or enhance a building or area.

[...]

Heritage

Camden's heritage

7.39 Camden has a rich architectural heritage with many special places and buildings from throughout Camden's history (see "Map 4: Heritage and Archaeological Sites" on page 210). 39 areas, covering much of the borough, are designated as conservation areas, recognising their special architectural or historic interest and their character and appearance. We have prepared conservation area statements, appraisals and management strategies that provide further guidance on the character of these areas. We will take these documents into account as material considerations when we assess applications for planning permission in these areas.

7.40 Over 5,600 buildings and structures in Camden are nationally listed for their special historical or architectural interest and 53 of the borough's squares are protected by the London Squares Preservation Act 1931. In addition, 14 open spaces in Camden are on Historic England's Register of Parks and Gardens. The Council also maintains a local list of over 400 non-designated heritage assets. Camden also has a generally well-preserved archaeological heritage, with 13 identified archaeological priority areas, although this can be vulnerable to development and changes in land use.

7.41 The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings.

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the 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, or all of the following apply:

a. the nature of the heritage asset prevents all reasonable uses of the site;
b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and d. the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:

e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

i. resist the total or substantial demolition of a listed building;
j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Enhancing the historic environment

7.42 The Council has a proactive approach to conserving heritage assets. In addition to the application of Local Plan policies the Council protects the historic environment through the following areas of work:
- Conservation Area Management Strategies: The Council works with the Conservation Area Advisory Committees to update and support the implementation of the strategies.
- Heritage at Risk: The Council identifies buildings and structures at risk and proactively seeks to conserve and where required put them back into viable use, including identifying sources of funding.
- Local list of undesignated heritage assets: The Council introduced the local list in 2015 and it will be updated annually.
- Guidance: The Council has adopted detailed guidance for the preservation of heritage assets in the supplementary planning document Camden Planning Guidance on design, and Retrofitting Planning Guidance (for sustainability measures in historic buildings). The Council updates planning guidance as required.
- Area based work: Conservation and enhancement of the historic environment is a key objective of area action plans and the Site Allocations. The Fitzrovia Area Action Plan for example sets principles for developing key sites which retain and enhance the setting of listed buildings.

7.43 The Council recognises that development can make a positive contribution to, or better reveal the significance of, heritage assets and will encourage this where appropriate. Responding appropriately to the significance of heritage assets and its setting can greatly enhance development schemes (for example, King's Cross Central)

Designated heritage assets

7.44 Designated heritage assets include listed buildings and structures, registered parks and gardens and conservation areas. The Council will apply the policies above and will not permit harm to a designated heritage asset unless the public benefits of the proposal outweigh the harm. Further guidance on public benefits is set out in National Planning Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20140306). Any harm to or loss of a designated heritage asset will require clear and convincing justification which must be provided by the applicant to the Council. In decision making the Council will take into consideration the scale of the harm and the significance of the asset.

7.45 In accordance with the National Planning Policy Framework the Council will only permit development resulting in substantial harm to or loss to a grade II listed building, park or garden in exceptional circumstances and

will only permit development resulting in substantial harm to or loss to a grade I and II* listed building, grade I and II* registered park or garden in wholly exceptional circumstances.

Conservation areas

7.46 In order to preserve or enhance important elements of local character, we need to recognise and understand the factors that create that character. The Council has prepared a series of conservation area statements, appraisals and management plans that assess and analyse the character and appearance of each of our conservation areas and set out how we consider they can be preserved or enhanced. We will take these into account when assessing planning applications for development in conservation areas. We will seek to manage change in a way that retains the distinctive characters of our conservation areas and will expect new development to contribute positively to this. The Council will therefore only grant planning permission for development in Camden's conservation areas that preserves or enhances the special character or appearance of the area.

7.47 The character of conservation areas derive from the combination of a number of factors, including scale, density, pattern of development, landscape, topography, open space, materials, architectural detailing and uses. These elements should be identified and responded to in the design of new development. Design and Access Statements should include an assessment of local context and character and set out how the development has been informed by it and responds to it

7.48 Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development which is outside of conservation areas, but visible from within them. This includes high or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.

Use

7.53 Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment. Two uses of particular importance to the character of conservation areas are pubs and local shops, especially when they are in located in historic buildings. The Council will protect these uses as set out in "Policy C4 Public houses" and "Section 9 Town centres and shops".

Details

7.54 The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the original. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring houses and streets to inform the restoration. The Council will consider the introduction of Article 4 Directions to remove permitted development rights for the removal or alterations of traditional details where the character and appearance of a conservation area is considered to be under threat.

Landscape

7.55 The value of existing gardens, trees and landscape to the character of the borough is described in "Policy A2 Open space" and they make a particular contribution to conservation areas. Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area.

Sustainable design and retrofitting

7.56 Historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival. In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed up against the degree to which proposals will change the appearance of the

building, taking into consideration the scale of harm to appearance and the significance of the building. Applicants are encouraged to follow the detailed advice in Camden's Retrofitting Planning Guidance, the energy efficiency planning guidance for conservation areas and the Historic England website.

Listed Buildings

7.57 Camden's listed buildings and structures provide a rich and unique historic and architectural legacy. They make an important and valued contribution to the appearance of the borough and provide places to live and work in, well known visitor attractions and cherished local landmarks. We have a duty to preserve and maintain these for present and future generations.

7.58 The Council has a general presumption in favour of the preservation of listed buildings. Total demolition, substantial demolition and rebuilding behind the façade of a listed building will not normally be considered acceptable. The matters which will be taken into consideration in an application for the total or substantial demolition of a listed building are those set out in the National Planning Policy Framework.

7.59 In order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest. Consent is required for any alterations, including some repairs, which would affect the special interest of a listed building.

7.60 The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development. While the setting of a listed building may be limited to its immediate surroundings, it can often extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. Applicants will be expected to provide sufficient information about the proposed development and its relationship with its immediate setting, in the form of a design statement.

Access in listed buildings

7.61 Where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. The Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution. We will expect design approaches to be fully informed by an audit of conservation constraints and access needs and to have considered all available options. The listed nature of a building does not preclude the development of inclusive design solutions and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.

Sustainability measures in listed buildings

7.62 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. Energy use can be reduced by means that do not harm the fabric or appearance of the building, for instance roof insulation, draught proofing, secondary glazing, more efficient boilers and heating and lighting systems and use of green energy sources. Depending on the form of the building, renewable energy technologies may also be installed, for instance solar water heating and photovoltaics.

Bloomsbury Conservation Area

Bloomsbury Conservation Area covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east. The initial designation of Bloomsbury as a conservation area in 1968 sought to protect elements of development from the Georgian and earlier eras, but excluded areas where there had been significant later redevelopment. There have been numerous subsequent extensions that have mostly reflected a growing appreciation of Victorian and Edwardian and high quality 20th century architecture.

Bloomsbury Conservation Area Appraisal and Management Strategy

The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted in April 2011. This document describes the character of the British Museum and associated surroundings as follows:

Sub Area 3: University of London/British Museum

5.27 This area is dominated by large-scale institutional buildings. To the north of the area is the University of London precinct and its associated colleges and faculties. To the south is the British Museum which occupies almost an entire street block north of Great Russell Street and south of Montague Place. As well as some exemplary eighteenth and nineteenth century buildings, there are several examples of 20th century architecture of international repute. The original street pattern is retained in most part, but 20th century development has involved the loss of some earlier, small-scale domestic terraces. In most cases, later buildings maintain and define street frontages, despite their larger scale and increased bulk and mass. There are a series of pedestrianised spaces and courtyards of varying scales between the buildings giving a quieter but nonetheless active campus atmosphere contrasting with the busy streets.

[...]

The British Museum

5.46 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 this the Conservation Area as a whole. The museum site covers the majority of the street block south of Montague Place. The principal South Front addresses Great Russell Street with a secondary frontage to Montague Place. The east side of the museum has a partial frontage to Montague Street. The museum was built in stages as its collections expanded. However, both historic and modern development is of a large scale, although large portions of the building are not visible from the public realm due to the backland nature of much of the site; the site is effectively shielded from the east and west by the terraced houses lining Montague Street and Bedford Square. For instance, the Round Reading Room at the heart of the site cannot be seen in long views. However the roof of the 1990s Great Court can be detected in views from Russell Square or Bedford Square. The Great Court scheme designed by Foster and Partners opened up the centre of the site to the public and created a pedestrian link during opening hours between Great Russell Streetand Montague Place. The principal building is a significant neo-classical early nineteenth century building: designed by Sir Robert Smirke in a Greek Revival style, it was started in 1823. The centrepiece is a pedimented classical colonnade of an Ionic order, reached up a grand flight of steps. The symmetrical composition is completed by two projecting ranges which enclose the large front forecourt. Set back from the frontage behind tall railings and a mature line of trees, this frontage forms an impressive landmark along Great Russell Street, and provides vistas from the south along narrow streets such as Museum Street, Coptic Street and Bury Place.

5.47 On the north side of the museum, the King Edward VII Galleries were built in 1906-14 to the designs of John James Burnet. The building presents itself to Montague Place as a large-scale frontage in line with the university buildings on the northern side of the street. The façade is constructed from Portland stone and marble with vertically proportioned metal-framed windows The symmetrical frontage is set back from the street behind a slightly raised forecourt. It comprises two tall storeys raised on a semibasement and has a line of Ionic columns supporting an entablature with projecting cornice and a pair of lion statues flanking the entrance. Demolition has recently taken place of a pair of 1971 neo-Georgian townhouses to make way for a new North-West wing designed by Rogers Stirk Harbour and Partners.

Regional Policy

The London Plan (March 2021)

In March 2021 the Mayor adopted The London Plan. This is operative as the Mayor's spatial development strategy and forms part of the development plan for Greater London. Policies pertaining to heritage include the following:

Policy HC1 Heritage Conservation and Growth

(C) Development proposals affecting heritage assets, and their settings, should 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.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (July 2021). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'.

At paragraph 8, the document expands on this as follows:

> *Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:*
>
> *a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
>
> *b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
>
> *c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

and notes at paragraph 10:

> *10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).*

With regard to the significance of a heritage asset, the framework contains the following policies:

> *195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 197 of the NPPF identifies the following criteria in relation to this:

> *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
>
> *b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
>
> *c) the desirability of new development making a positive contribution to local character and distinctiveness*

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 199 the framework states the following:

> *...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

The Framework goes on to state at paragraph 200 that:

> *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
>
> *a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 201 of the NPPF states that:

...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use

With regard to 'less than substantial harm' to the significance of a designated heritage asset, paragraph 202 of the NPPF states the following;

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and world heritage sites and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 206 states that:

... Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas and world heritage sites it states, in paragraph 207, that:

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving

sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- **archaeological interest**: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **architectural and artistic interest**: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- **historic interest**: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset. If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 199-203 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 199-203) apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 200).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

Other Relevant Policy Documents

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

Historic England: Conservation Principles and Assessment (2008)

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