

1 June 2023

London Borough of Camden
Development Management Team
5 Pancras Square
London
N1C 4AG

FAO Elaine Quigley and Catherine Bond

Dear Officers

Applications for planning and listed building consent | British Museum
Repair and waterproofing of 5.No the lower roofs, replacement plant and other associated structural, internal and external works

Introduction

On behalf of the Trustees of the British Museum, we enclose applications for planning and listed building consent to repair and waterproof the lower roofs at the British Museum (BM), Great Russell Street, London, WC1B 3DG.

The BM has identified water ingress from 5 no. flat roofs in the connecting corridor between the main building and East residence and later additions behind this corridor in Sector B. As a result of the water ingress and damage being caused internally it is proposed to refurbish these roofs to prevent further water ingress and to improve their thermal performance. The 5no. roofs were built at various times in various types of construction, outlined in detail in this application. The Museum is looking to carry out works to secure the roofs' structure and renew the waterproofing, to protect the spaces below, whilst protecting fabric of historic value.

The proposed description of development is:

"Repair and waterproofing of 5no. roofs at the British Museum, replacement plant and other structural and internal and external associated works".

It has been confirmed with LBC officers that the proposal requires planning and listed building consent.

Submission content

This application has been submitted via the planning portal (ref: PP-12179964). The following forms the submission and supporting documents:

- Application form;
- Location Plan at scale 1:1250 and Block Plan at scale 1:500, prepared by Nex;
- Existing and proposed plans prepared by Nex;
- Existing and proposed elevations prepared by Nex;
- Existing and proposed sections prepared by Nex;
- Design and Access Statement, prepared by Nex;
- Heritage Statement, prepared by Donald Insall Associates;
- Structural Statement and methodology prepared by Civic;
- Noise report prepared by Venta with drawings from Hoare Lea;
- CIL form.

The relevant planning application fee of £298 has also been submitted. There is no fee for an application for listed building consent.

The Site

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

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

Conservation Plan & heritage significance | The BM's Conservation Plan was originally adopted in 1999 and later revised by Purcell Architects in 2007/8. The BM has recently consulted LBC and Historic England on the latest revision of the CMP (2019). The Conservation Plan contains a detailed appraisal of the significance of the BM as a whole and highlights that it represents the high point of neo-classical Museum style in the UK. As noted above, much of the BM's estate is Grade I listed, being of international significance and sitting in the Bloomsbury Conservation Area. The Site was constructed under numerous phases from Smirke's Quadrangle masterplan to the 21st century WCEC. There is innate value in the historical built fabric overall, especially where it survives from the earliest building phases. The use of pioneering construction techniques and innovative design across the phases is also important as are the BM's association with a succession of architectural figureheads. Its special architectural and historic character can in part be attributed to the significance of its collection and the considerable social value attributed to its use as a Museum; containing some of the world's most valuable and coveted collection of ancient artefacts. The BM was founded on the principle that its collection was for the nation and would, therefore be accessible to everyone. This is a key theme which continues today and is a driving force behind much of the BM's decision making and future planning.

The Heritage Statement for this application, prepared by Donald Insall Associates, identifies the historic interest of the 5no. roofs to which this application relates. It identifies that three of the roofs are modern, and make no contribution to the significance of the building. The roofs over the corridor 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 buildings 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. It was also used on other innovative buildings of the period including the Palace of Westminster, where the roofs have generally failed. Further detail is provided in the Heritage Statement.

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

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

Planning History

In 2019 consents 2019/5640/L and 2019/5569/P for replacing sections of roof over the south colonnade and south-east wing included permission to replace the 5no. roofs in this project. Permission was granted for full survey access for a design team to complete roof void surveys for all of the South Colonnade and east range roofs. The application correctly identified the 3no. existing bitumen felt roofs, however incorrectly identified the slate roofs, with one shown as copper and one as lead covered over with felt. Although works from

this application have been part implemented over areas of the south colonnade, no works were undertaken to the 5no. roofs covered in this letter.

In December 2022, it was agreed via exchange of letters for the opening up works from above and below of the 5no roofs to take place, to identify their build up and condition. The openings from these works have been undertaken and the findings set out in the Design and Access Statement, and the openings temporarily patched from above and below as the roofs await a full renovation.

Pre-application Discussion

The findings from the investigative works and proposed repair options were set out in a letter (exchange of letter) to LBC Officers in May 2023. Officers were comfortable with the repair of the less significant felt roofs but requested to discuss the repair options for the slate roofs at the BM, LBC and HE Quarterly Estates meeting on the 18th May 2023.

At this meeting, Nex presented the findings of the opening up and the research carried out into repair of slate roofs, identifying other examples of repair and where these had subsequently failed. The design team presented three different options for the repair and waterproofing of the slate roofs. The preferred option to retain the roofs and encapsulate these in a waterproofing liquid membrane was presented and explained in full. Officers questioned whether the repair option could be progressed first and then encapsulating if needed; however, the design team explained the limited chance of this working and the operational and cost impact of this 'double' solution, alongside the programme and logistical implications this would entail, noting the spaces below would be closed off during the works. Officers agreed that the encapsulation method would be the most suitable solution to retain fabric and achieve water tightness. Officers noted that they would likely add a recording condition to any consent issued and that this information could be added to the Gazetteer.

Proposal

The works are described in detail in the Design and Access Statement but in summary, the following works are proposed to the 5no. roofs:

- 2no. slate roofs – retain slate roof in situ and apply cold applied roofing membrane over the slate roof construction with the inclusion of insulation.
- 2no. slate roof – new timber reinforcement to be inserted within the existing roof void between the slate roof and stone/slate ceiling.
- Replace lath and plaster ceilings like for like
- 3no. felt roofs – like for like replacement of felt roof covering
- 3no. felt roofs – replace structure, deck and ceiling where needed
- Replacement of cast iron rainwater goods to 3no. roofs with like for like replacements
- Retain and encapsulate existing copper gutters to 3no. roofs
- Install a mansafe system to roofs for maintenance and access
- Like for like replacement of rooflight, roof top plant and cable rationalization.
- Areas of brick-re-pointing
- Internal services and refurbishment of Day shift office including installation of new flooring, services and decoration to doors and windows.

Planning policy context

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

The LBC planning policies most relevant to the consideration of the works presented as part of this application include D1 (Design), and D2 (Heritage). Policy D2, reflects the aims of the NPPF: developments that involve the loss or substantial harm to a designated heritage asset will not be permitted unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Developments that propose less than substantial harm are required to be convincingly outweighed by the public benefits of the proposed works. Development should also preserve or enhance the historic environment and heritage assets. LBC will resist development that would cause harm to significance of a listed building through an effect on its setting.

London Plan Policy HC1 (heritage conservation and growth) requires development proposals affecting heritage assets, and their settings, to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.

Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

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

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

Policy Assessment

The proposed works are essential and urgent repairs to the lower roofs to prevent further water ingress and damage. A long term solution is required to prevent further deterioration to interiors as a result of water ingress. 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. The slate roofs are of uncertain structural integrity it is also proposed to support them from below with a new timber structure which will give enough certain strength to allow maintenance access. This part of the proposals will entail removing an existing lath and plaster ceilings of limited significance and carefully dismantling a slate ceiling of moderate significance, to be reinstated once the works are completed.

Heritage | In accordance with NPPF paragraph 194, the significance of the roofs affected has been described as part of the application. In accordance with paragraph 199 of the NPPF great weight has been given to the assets conservation. Where a development proposal leads 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 (paragraph 202). The Heritage Statement identifies that while 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 ceiling, 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 and the insulation will improve the thermal performance; 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 because of the works (para 202). The proposals will also accord with LBC Policy D2 whereby the less than substantial harm is convincingly outweighed by the public benefits that will result from the roof works.

Design | The roofs are invisible from all public points of vantage and have no relation to the buildings setting or the wider conservation area. The proposals will not result in any visual difference. The waterproofing membrane will be below the front coping stone on the main corridor roof and not be visible. All the other proposals are located discretely behind the main corridor and not visible. The rationalisation of cables, replacement plant and rainwater goods will also improve the quality and aesthetic of roofs in this location on the Estate. The proposals will be in accordance with LBC Policy D1 whereby they will preserve and enhance the historic environment and comprise high quality details and materials.

Noise | It is proposed that the mechanical plant atop the three flat roofs is replaced; they are life expired and in need of replacement. The proposal is to replace these with new models in the same locations, to avoid direct impact on the roofs with historical significance. The new plant will be mounted on a Big Foot system to avoid penetrative fixings through the roof membrane as well as easy future removal and replacement. A noise report has been prepared to assess the noise impact of the replacement plant on the roof, this has demonstrated that the plant noise emissions are in accordance with LBC Policy A4 and generate an acceptable level of noise and vibration and will not harm nearby amenity. The predicted noise levels are in accordance with Table C, of Appendix 3 of the LBC Local Plan in relation to acceptable noise levels from plant and machinery.

Summary

The proposed works include the repair and waterproofing of 5no. roofs at the British Museum. The proposal will replace 3no. felt roofs like for like and intends to encapsulate 2 no. slate roofs in a cold applied waterproof membrane with the inclusion of insulation. The preferred option to encapsulate the slate roofs will retain the significant fabric on site but provide a waterproofing solution to avoid further damage to historic fabric from water ingress. The proposals may cause a small level of harm to the significance of the British Museum but this is outweighed by the public benefits of waterproofing the building and avoiding further deterioration internally.

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

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

Yours faithfully

The Planning Lab