

6 January 2020

London Borough of Camden  
Development Management Team  
5 Pancras Square  
London  
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FAO Elaine Quigley and Catherine Bond

Dear Officers

## **Planning and Listed Building Consent Application | British Museum**

### **Installation of new exterior roof access hatch**

#### **Introduction**

On behalf of the Trustees of the British Museum, we enclose a Planning and Listed Building Consent application for the installation of a new exterior roof access hatch at the British Museum (BM), Great Russell Street, London, WC1B 3DG. The proposed description of development is:

*Installation of a new exterior roof access hatch in the roof void above the Greek and Roman Study room.*

#### **Submission Content**

This application has been submitted via the planning portal (ref: PP-08377836). The following forms the submission and supporting documents:

- Application form and CIL form;
- Location Plan at scale 1:1250 and Block Plan at scale 1:500 (ref. S&MP-R SK-0006 Rev. B);
- Existing + proposed elevations (ref. S&MP-R SK-0007 Rev. A);
- Existing + proposed roof plan (ref. S&MP-R SK-0008 Rev. B);
- Access hatch details (ref. S&MP-R SK-0009 Rev. A);
- Design + Access Statement, dated 19 December 2019, prepared by Frank Timothy Associates Limited;
- Heritage Impact Assessment, dated 2 January 2020, prepared by Frank Timothy Associates Limited.

The relevant planning application fee of £234.00 has been submitted. There is no fee required for listed building applications.

#### **The Site**

**BM Estate |** The BM is one of the UK's most popular visitor attractions. The Museum 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 in the north of the site and the Grade II\* railings at the front. The original elements of the 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 the original quadrangle which dates from 1823-47. His plans consisted of four wings with an impressive iconic colonnade along the building's south elevation. The building consists of two principal storeys, adhering to the Greek Revival style, which also includes the columns and pediment at the south entrance.

**The Greek and Roman Study room** | Previously known as the Medal Room, this area is located at the southernmost end of the West Wing development. It was originally designed as a public space and finished to the same high standard as the exhibition rooms. There is a roof void above the Greek and Roman Study room; the external roof is above this. Externally, the roof decking is assumed to be hardwood, most likely mahogany or similar and laid diagonally as found elsewhere in the major roof areas. There is also a copper finish which has been replaced relatively recently.

**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 site 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.

**Conservation Plan & heritage significance** | The Museum's Conservation Plan was originally adopted in 1999 and later revised by Purcell Architects in 2007/8. The Conservation Plan contains a detailed appraisal of the significance of BM as a whole and highlights that BM represents the high point of neo-classical Museum style in the UK. As noted above, the Museum is a Grade I listed building of international significance, which sits in the Bloomsbury Conservation Area. It was constructed under numerous phases, from Smirke's Quadrangle Building to the 21<sup>st</sup> 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 Museum'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 Museum 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 Museum's decision making and future planning.

The Greek and Roman Study room is considered to be of high significance, which is noted in the Conservation Plan to be attributed to the high-quality finish, stone architraves and the adapted ceiling. The alterations of 1975-78 are noted to have compromised the grandeur and proportion of both rooms. Moreover, the lobby spaces are of newer construction (1970s) and utilitarian spaces. The spaces and features within the offices are of varying quality - many are not decorative and fairly utilitarian in appearance, having been heavily adapted in modern times. The roof void above this room is not of any particular significance.

**Related planning history** | The planning history below includes a list of maintenance and alteration works that have been undertaken in recent years to the roof of the BM:

- **2019/5569/P + 2019/5640/L** | Roof alterations including replacement of existing copper roofs with new copper roof at the main portico; replacement lead roof over contractors' desk, replacement copper roof of the east advancing wing with copper roof and replacement of 3 roof lanterns, relocation of access hatches with new maintenance route and guard rails. Structural repairs, including soffit repairs, repairs to South Colonnade flagstones and repair to roof timbers (*granted 27 December 2019*).
- **2019/5564/P + 2019/5630/L** | Replacement of 4 roof lanterns on the roof of the White Wing, infilling of brickwork following removal of two single-storey plant structures and erection of new insulated wall; and installation of new access ladder to roof all in association with the Museum (*granted 24 December 2019*).
- **2016/0498/P + 2016/0462/L** | Internal and external alterations including replacement of existing copper, uninsulated flat roof and single glazed skylights, with new lead, insulated roof with double-glazed skylights with external louvres to the roof of galleries 42-45 of the White Wing gallery of the Museum.

## Proposals

The proposals include the creation of a small new opening on the roof above the existing roof void above the Greek and Roman Study room to allow for the installation of a new exterior roof access hatch. This will provide access to this part of the roof to allow for upgrading of the electrical services infrastructure, including the fire alarm and emergency lighting systems. The hatch will have dimensions of 1195mm (l) x 1195mm (w) x 406mm (h), which is the same as other existing access hatches on the roof. The access hatch will comprise a single leaf hatch door. It will also be similar in appearance and colour, having a mill aluminium finish on the surface and Bil-Clip flashing system around the perimeter of the hatch. The existing copper finish will be adapted to form necessary ridges and valleys immediately behind the hatch to ensure that the area is watertight.

The hatch will not be visible externally. It is in a discrete location and will provide access from the external roof to an internal roof void. In addition, the proposed hatch will not be visible internally from the Greek and Roman Study room. It is in a roof void and will not affect any internal ceilings. Therefore, it will not impact on any features in the Greek and Roman Study room.

## **Pre-application Advice**

In November 2019, discussions were held with LBC officers regarding the principle of installing new life and fire safety systems to the Greek and Roman Room. A site visit was subsequently held and it was agreed that while the systems could be installed, the proposed roof hatch would require planning and listed building consent. As such, this application has been prepared to address this requirement.

## **Planning Policy Context**

**Primary legislation** | The key primary legislation relevant to the planning process is as set out in the Town and Country Planning Act 1990 (as amended) (the Planning Act); and the Planning (Listed Building and Conservation Areas) Act 1990 (the Listed Building Act). S.16 and s.66 of the Listed Building Act impose a statutory duty on planning authorities consider the impact of proposals upon listed buildings and their settings. S72 of the same Act seeks to ensure proposals preserve or enhance the character or appearance of conservation areas. Under Section 38(6) of the Planning Act, the determination of planning applications must be in accordance with the Development Plan, unless 'material considerations' indicate otherwise.

**The National Planning Policy Framework 2019 (NPPF) & Planning Practice Guidance 2014 (PPG)** | Government guidance on how to carry out the statutory duties in the Acts are found in the NPPF. At the heart of the framework is a presumption in favour of sustainable development. This applies unless any adverse impacts of a development would 'significantly and demonstrably' outweigh the benefits. Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced and makes it clear at Paragraph 193 that when considering the impact of a proposed development on a heritage asset (including its setting), Local Planning Authorities should give great weight to preserving the assets significance. Any harm or loss should be exceptional. In the case of a Grade I listed building, substantial harm or loss should be wholly exceptional (Para 194). Where harm is caused, the NPPF requires decision makers to determine whether the harm is substantial or less than substantial. If the harm is deemed to be less than substantial, Paragraph 196 requires that harm to be weighed against the public benefits, including where appropriate securing the optimum viable use. The NPPF also sets out that account should be taken of the desirability of sustaining and enhancing the significance of heritage assets, putting them into viable uses consistent with their conservation.

**The Development Plan** | The Development Plan relevant to the assessment of works comprises the GLA's London Plan (LP) 2016 (and the draft LP July 2019); 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.

Policy C5 of Camden's Local Plan requires the Council to make Camden a safer place. It states that the Council will require appropriate security and community safety measures in buildings and spaces.

The LBC Design CPG contains a section on heritage. It states that the Council will make a balanced judgement having regard to the scale of any harm or loss of significance of the asset affected. With regard to alterations to a listed building, the CPG states that some 'like for like' repair and maintenance works do not require listed building consent. However, where these would involve the removal of historic materials or architectural features or would have an impact on the special architectural or historic interest of a building, consent will be required.

In assessing applications for listed buildings, the Council will consider the impact of proposals on the historic significance including its features, such as original and historical materials and architectural features; original layout of room; structural integrity; and character and appearance. Repairs should be in 'matching materials'.

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 Museum cannot be seen from the public realm due to the 'backland nature of much of the site'.

## Planning Policy Assessment

The Museum is a Grade I listed building of international significance, which sits in the Bloomsbury Conservation Area. Its heritage interest and significance are summarised above and identified in more detail in the Museum's Conservation Plan, which has informed the proposed works that are subject to this application. A Heritage Impact Assessment is submitted in support of this application, however an overview of the impact of the works on the historic fabric is outlined below.

The proposed access hatch is required in this location to allow roof access for the installation and maintenance of major safety infrastructure, including fire alarm and emergency lighting systems, which will protect lives as well as the fabric of the historic building. The proposed hatch is required to facilitate access to this part of the roof. The works are essential to maintain the building in the longer term in accordance with the aims of the NPPF, and to ensure appropriate safety measures in accordance with Camden Policy C5.

In accordance with Policy D2 and paragraph 196 of the NPPF, the proposed works and any minor harm that arises is considered to be weighed against the benefits of the proposals including enabling access to this part of the roof for maintenance purposes, which is imperative for the long-term upkeep of the Museum building. The proposed area for the roof hatch has been carefully considered and selected after the impacts have been fully understood. It is considered to be the most discrete location for the proposed hatch and will not be visible from within the main Museum building nor from the surroundings. The proposed works will be sensitively undertaken by a specialist contractor, thereby ensuring that the heritage asset is preserved and protected, in line with NPPF objectives and Camden Policy D2.

The works will not result in any significant physical alteration to historic fabric. Whilst it will be necessary to cut and trim the decking, this is relatively insignificant. The original structure will remain largely unaffected and the proposals will not impact features of special interest. The proposed works are to the roof above an existing roof void and therefore will not result in any visible internal changes. There will be no impact on the Greek and Roman Study room, including on the decorative ceiling plasterwork.

In terms of impact on the surrounding conservation area, the roof area is not readily visible externally from street level, therefore there will be no impact on the character and appearance of the surrounding conservation area in accordance with Policy D2. Notwithstanding, the proposed access hatch replicates other existing hatches on the roof of the building to ensure continuity in terms of materials and appearance.

Overall, the new access hatch will enable maintenance of the historic fabric in the long term whilst respecting the significance of the historic building and ensuring public safety in the building. Any minor harm is outweighed by the significant improvement in fire protection and public safety in the building. The works thereby meet the objectives of the NPPF (section 16), specifically paragraph 196, as well as Camden Local Plan policies D1, D2 and C5.

## Summary

BM is an important building in Camden and the proposed works will allow access to the roof for essential maintenance whilst preserving its heritage and ensuring the long-term safety of the building. The works have been carefully designed to ensure that they are sympathetic to the listed fabric and are not visible externally. Any minor harm which would arise as a result of interventions to this small area of the roof is far outweighed by enabling access to the roof for maintenance purposes, to ensure the long-term preservation and protection of the building for the public. This will help BM maintain its international reputation and in turn meet with the objectives of the local and national policies.

If you have any questions, please contact me at [victoria@theplanninglab.com](mailto:victoria@theplanninglab.com) or on 0207 257 9363.

Yours faithfully

**Victoria Cartwright | Director**  
**The Planning Lab**