

2 November 2022

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

**FAO Elaine Quigley and Catherine Bond**

Dear Elaine and Catherine,

**Listed Building Consent Application | British Museum, Temporary scaffolding to facilitate roof and water ingress works to Gallery 17, 19, Gallery 62 (plant room), Gallery 72 and the King Edward Building**

**Introduction**

On behalf of the Trustees of the British Museum, we enclose a Listed Building Consent application for 2no. of scaffolding to facilitate roof and water ingress works above the West Wing galleries and the King Edward Building (KEB) at the British Museum, Great Russell Street, London, WC1B 3DG.

The British Museum is hoping to carry out urgent repair and maintenance works to the following roof locations which are resulting in water ingress:

- Roof above Gallery 17
- Roof above Gallery 19
- Roof and plant from above Gallery 62
- Roof of Gallery 72
- Roof above the KEB

It has been agreed with LBC Officers (via email on 3<sup>rd</sup> December 2021) that the Museum can proceed with the repair works without the need for listed building consent on the basis that they do not impact the special architectural or historic interest of the listed building.

The Museum has since explored various options to as an alternative to the erection of scaffolding to carry out these works. This includes the delivery of materials and accessing the roof via routes through the Museum. However, these have all been deemed inappropriate logistically or discounted for other health and safety and security reasons. Therefore, a temporary scaffold is necessary to facilitate the essential maintenance and ensure that the works can be completed as soon as possible to protect the fabric within the buildings.

The proposed description of development is:

*Erection of 2no. of scaffolding to facilitate roof and water ingress works above the West Wing galleries and the King Edward Building.*

**Submission content**

This application has been submitted via the planning portal (ref: PP-11649378). The following forms the submission and supporting documents:

- Application form
- Location Plan at scale 1:1250 and Block Plan at scale 1:500
- Existing and proposed drawings by Purcell

There is no administration fee required for the listed building works.

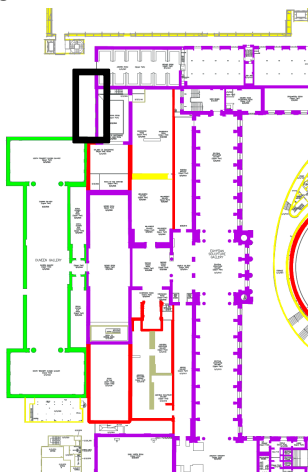
## The Site

**British Museum Estate** | The British Museum is one of the UK's most popular visitor attractions. It was founded in 1753, as the first national public museum in the world, and has been open to the public since 1759. Both permanent collections and special exhibitions are presented within displays for the public with approximately eight million objects in the Museum's collection overall.

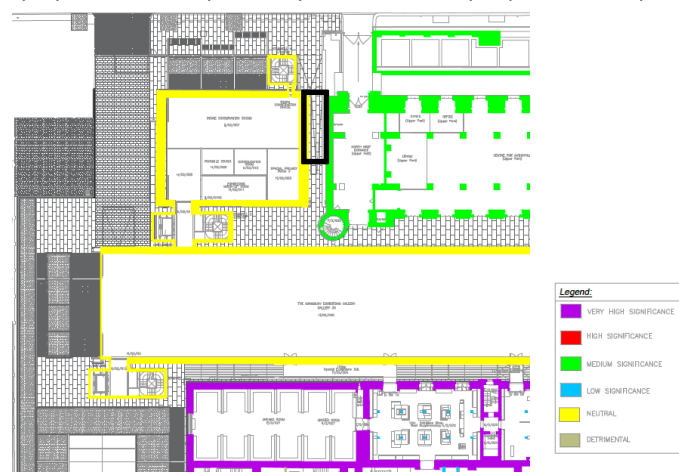
The Museum's estate is situated on the north side of Great Russell Street within the Bloomsbury Conservation Area. It is bounded by Montague Place, Montague Street, Bloomsbury Street and Great Russell Street. The estate houses a number of important listed buildings, including the Grade I listed Quadrangle Building, and individually listed KEB, north of the site and subject to this application; and other listed elements such as the railings and a number of lampposts at the front. The original elements of the Museum date back to 1755- 1822 when Montague House was purchased to house the new British Museum collection. There was a need to expand the Museum 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 principal 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 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. 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 Management Plan (CMP) & heritage significance** | The Museum's Conservation Plan was originally adopted in 1999 and later revised by Purcell Architects in 2007/8. The Museum has been updating the CMP and is currently in discussions with LBC and HE officers on the latest CMP. The Conservation Plan contains a detailed appraisal of the significance of the Museum as a whole which is considered to represent a 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 masterplan 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 of 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 2007 Conservation Management Plan notes that the area affected by the scaffold is Gallery 30 west elevation (**scaffold 1**) which is of very high significance and the west elevation of KEB (**scaffold 2**) which is of medium significance. The works associated with the erection of the scaffolds is proposed externally and they will not have any impact internally.



(Scaffold 1) Scaffold location for works over the West Wing Galleries



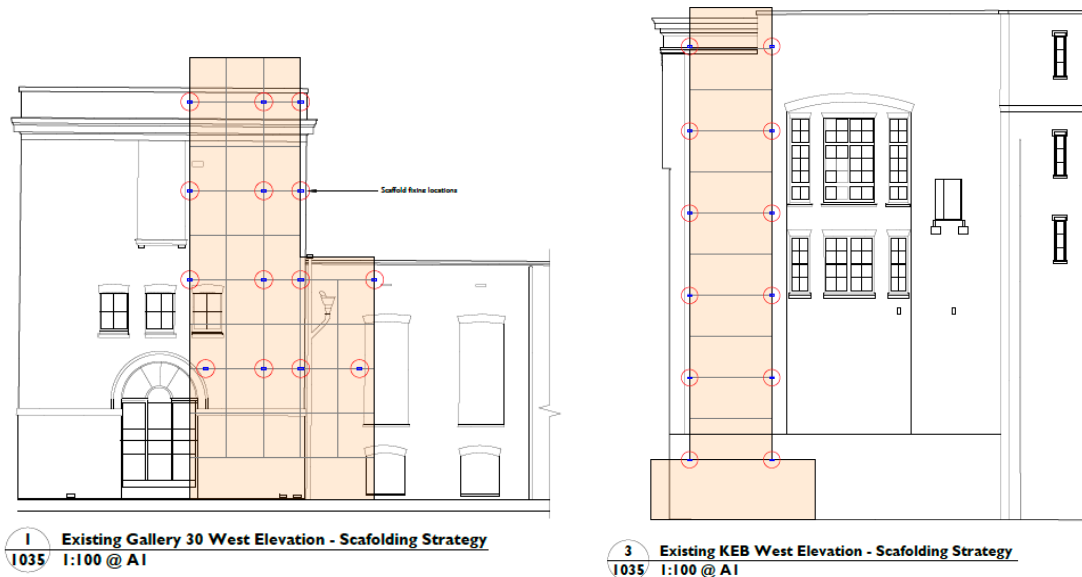
(Scaffold 2) Scaffold location for works over the KEB

## Proposal

The scaffolding is to facilitate urgent repair works to the roofs to mitigate water ingress which is both putting the integrity of the building and the collection at risk of significant damage, and has also been damaging internal ceilings and walls of the building leading to public safety concerns about loose areas of lime plaster falling.

The locations of the projects are difficult to access. Having carried out a thorough review of the estate, there were only specific locations that the scaffolds could be erected. Due to the complex nature of the building, each of the locations has various constraints meaning it cannot be erected as a kentledge & buttressed scaffolding which would usually be best for Grade I listed building. This is due to the risk of overloading and damaging the basement structures below. On the KEB, the space in which the scaffold needs to be erected is so narrow, it requires tying to the building to ensure stability.

Two ties approaches were put forward for review with Camden Council via an exchange of emails on 27<sup>th</sup> July 2022, the first option was to fix into the mortar lines which was deemed preferable. This was progressed and tested but failed the pull tests due to the nature of the existing mortar, meaning the remaining option was to resin tie into the centre of the brick to ensure structural stability. It is proposed that there will be 14 holes on the Gallery 30 west wall and 12 holes on the west wall of the KEB, each hole will be 1.2cm in diameters and will go into the centre of the brick.



## Making good methodology from Purcell

There are two repair strategies available for the bricks. The first is to fill the brick hole with a lime mortar and brick dust to match the brick, leaving it in situ. The second is to replace the brick with reclaimed fair faced bricks of matching colour and characteristics which would be Purcell's and the Museum's recommendation.

There have been numerous brick replacements which are evident across the elevations where the scaffolding is being erected. These have been done in varying colour matches potentially indicating the conservation approach at the time, to try and disguise the repairs or to contrastingly show honest repairs to the building. These have been done in red bricks rather than a London stock brick match. In this instance, Purcell recommend replacing and matching the existing bricks, picking a selection with varied shades to mitigate any pattern showing in the wall.

## Planning Framework and Assessment

The policies within The National Planning Policy Framework 2021 (NPPF) including the Planning Practice Guidance 2021 (PPG) form a material consideration in the determination of this application. The Development Plan is formed of the GLA's London Plan 2021, and the Camden Local Plan is comprised of: The Camden Local Plan July 2017; the Site Allocations Plan September 2013; and the Policies Map (updated version) January 2019. These documents are supported by Camden's Planning Guidance Note on Design and the Bloomsbury Conservation Area Appraisal 2011. Historic England Temporary Structures in Historic Places 2010 also provides a useful reference.

## Key planning issues

There is no change of use attributed to the temporary structures; they remain an important ancillary function of the Museum's primary use as a museum (in F1 use class). The Museum is not proposing new structures, and no new floorspace is proposed. The proposal is considered a minor development which will not trigger the need for environmental provisions. There are also no amenity considerations associated with the structures, they do not omit any noise, or block any light. Therefore, in this case, the primary planning issue relates to the impact of the temporary structures on the heritage setting. This is considered further against the planning policy context below.

### **Design and heritage considerations**

**Policy summary** | Section 16 of the NPPF requires heritage assets to be conserved in a manner appropriate to their significance. Paragraph 197 confirms that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Paragraph 199 states 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). Paragraph 202 confirms that, 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.

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 LBC planning policies most relevant to the consideration of the works presented as part of this application include D1 (Design) and D2 (Heritage). LBC Policy D1 seeks to secure high quality design in development, including that which preserves or enhances the historic environment and heritage assets in accordance with Policy D2. Policy D2 reflects the aims of the NPPF. 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.

HE's guidance on Temporary Structures in Historic Places also provides guidance on 'best practice' in the project management, design and regulation of temporary structures in historic places. The guidance stresses the importance of taking a proportionate approach, particularly in relation to regulatory matters, because the scale and complexity of temporary structures, and their impact on the historic environment, varies widely. It recognises that the majority of temporary structures do not cause harm to the historic environment, but careful planning and project management is necessary to prevent permanent damage and mitigate any adverse impacts. The guidance also acknowledges that temporary structures in historic places are not appropriate in every location and need to be carefully positioned and designed to avoid potentially disfiguring or damaging sites and landscapes of heritage importance. Notwithstanding, there should not be a presumption against temporary structures simply because they are visible in the historic environment. The guidance also identifies the importance of siting temporary structures in such a way to minimise their impact on important views and disturbance of the visual character of historic areas.

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".

**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 CMP 2007 and the updated CMP 2019, which has informed the proposed works that are subject to this application. It is also set within the Bloomsbury Conservation Area. Other listed buildings are in the vicinity, on Great Russell Street and Montague Place.

However, the Museum's overall special historic interest can also be attributed to the significance of its collection and the considerable social value attributed to its use as a museum containing of some of the world's most valuable and coveted collection of ancient artefacts. In this regard, the Museum must be able to serve the needs of its visitors: this is its primary function. There is a clear need for the temporary scaffolds to facilitate the water ingress repair works at roof level over the KEB and the West Wing Galleries, namely stemming from the need to keep visitors and the collections safe. There will be 14 holes on the highly significant facade on the Gallery 30 west wall and 12 holes on the medium significant wall on the west elevation of the KEB. However, these holes are necessary to secure the scaffolds, protect the listed building and to ensure the health and safety of the maintenance team is not compromised. The benefits of the works outweigh the minor impact on the bricks. There is a making good strategy by Purcell. These holes will be filled and made good. If the bricks require replacing, brick with reclaimed fair faced bricks of matching colour and characteristics will be used to ensure they are sympathetic to the listed building. Therefore, the works are not considered to cause any long term harm to the architectural or historic interest of the Grade I listed building.

The works would also not have any adverse impacts on the character and appearance of the listed building and the Bloomsbury Conservation Area.

The proposed making good strategy will be carried out in line with conservation best practice and methodologies. They involve sensitive repairs on a like for like basis and will not seek to change the original appearance, or cause any harm to any features of architectural or historic interest of the listed building. The overall impact on the fabric resulting from the proposed works will be positive for the listed building, thereby complying with Policy D2, LBC's Planning Guidance Note and the principles of the NPPF.

There are many historic building and other public benefits to be accrued from the works, stemming from the Museum's ability to preserve and protect its listed estate from further incremental damage and providing a safe environment for visitors. This is also supported in CPG policy, as set out above.

Overall, the proposed works are urgent and essential improvements to the British Museum. The improvement will also contribute to the overall visitors' experience and in turn 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 [kelly@theplanninglab.com](mailto:kelly@theplanninglab.com) or Melanie Gurney at [melanie@theplanninglab.com](mailto:melanie@theplanninglab.com), or on 0207 257 9363.

Yours faithfully

**Kelly Ryder | Director**  
**The Planning Lab**