

20 January 2026

Dear Ethne

Royal Berkshire Archives: planning application 211485, condition 7b

I am writing on behalf of the six Berkshire councils – the providers of the joint archives service - to explain why it is not feasible to provide a green/brown roof on our extension.

The extension must be delivered to meet the recommendations of BS EN 16893: 2018 (Conservation of Cultural Heritage). If it is not, then it cannot be licensed by The National Archives for storage. We would be unable to use it and would also be in technical breach of the joint agreement for archives, to which Reading Borough Council is a party.

Section 5.6 of BS EN 16893 clearly states that: 'Vegetation shall not be incorporated into the structure of a new building or against external walls'. This is because vegetation provides a home for many species that present a direct threat to archive collections. For them, the collections are an ideal food source.

The National Archives has been consulted on the proposal to provide a green/brown roof. They state that such a roof would clearly not comply with BS EN 16893. I know that you were able to find examples of UK heritage buildings that include a green or brown roof – the BFI and the Museum of the Home - but I can confirm that these were installed before BS EN 16893 was issued and/or are not above heritage storage areas.

We are very keen to mitigate the loss of the green/brown roof. We are making alternative proposals to support biodiversity and water attenuation onsite that we hope will achieve the same aims.

With best wishes

A handwritten signature in black ink, appearing to read 'Mark Stevens'.

MARK STEVENS

County Archivist