



6 January 2025

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

Dear Officer,

Application for Planning Permission | Temporary bag search facilities at the south and north entrances, The British Museum, London WC1B

Introduction

On behalf of the Trustees of The British Museum (the Museum), we enclose a planning application to support the temporary retention of the two temporary bag search structures at the south and north entrances (the proposals) of The British Museum, London, WC1B 3DG (the site). The Museum proposes to retain the existing structures in their current form and location on a temporary basis while the longer-term interim strategy to replace the structures is progressed.

The proposed description of development for the planning permission is:

Temporary retention of bag search security facilities at the south and north entrances of The British Museum for a period of 18 months.

Background and Application Summary

The Museum is one of the UK's leading visitor attractions, regularly welcoming over 6 million visitors a year to its Bloomsbury site. The total attendance each day varies by season. However, there is a continuous flow of visitors that must be organised, with appropriate bag search facilities, before entry to the main buildings to ensure the safety of visitors, staff, and the priceless collections. The two existing search facility structures perform this function. The south security facility is located in the south forecourt, serving the main entrance of the Museum for the circa 50% of visitors who arrive via Great Russell Street. The north security facility is located north of the King Edward Building (KEB) aligning Montague Place, accommodating circa 50% of visitors entering the Museum.

The existing structures were originally granted temporary planning permission by the London Borough of Camden (LBC) in August and September 2020 (ref: 2016/2523/P and 2016/4219/P) for a period of two years (expired in August and September 2022). In March 2023, permission was granted (ref: 2022/3159/P) for the continued use of single storey structures in the south and north entrances to provide an external search facility to the Museum for a further temporary period of 2 years (expiring in March 2025). The UK's security threat level is currently 'substantial', and the UK Response Level is 'heightened'. The Museum's security threat level is, therefore, an ongoing risk with the security search facilities remaining essential to the safe operation of the Museum at the principal visitor entry points.

The Museum is actively considering its long-term strategies for the overall museum estate. It acknowledges that the existing security structures are not an appropriate permanent solution. The Museum is working closely with architects and has previously sought advice from a specialist visitor flow consultant to confirm the spatial requirements for visitor search and queuing, which will be evolved into a more comprehensive, longer-term solution to tackle the essential need for search facilities. Concurrently, the Museum is working to understand the impact of potential major projects to deliver a holistic and coordinated approach overall. This includes the construction impacts from the Energy Centre Programme (ECP) including the introduction of a crane into the south forecourt for the duration of the construction period for the South West Energy Centre (SWEC) (ref: 2023/4648/P and 2023/4903/L, approved October 2024). While these important assessments are underway, the existing structures are required to be retained in situ for a further 18 months.

Temporary Bag Search Facility Strategy

The on-going need for the bag search facilities has been discussed in detail with LBC officers over the past few months, most recently at meetings with Bethany Cullen, Dan Pope, and Ed Jarvis. These discussions have informed the proposals presented as part of this planning

application. The principle of renewing the existing consent for the north and south entrance security structures for a period of 18 months (from March 2025 – September 2026) has been discussed and agreed. Alongside this the Museum seek to develop the design for the 10-year interim solution for the security and search facilities which will see the removal of the temporary structures to the north and south entrances and an enhanced visitor welcome experience. This is intended to be devised with security, visitor flow, accessibility and heritage as driving principles of the design and integration within the Museum while also introducing a landscaping strategy to the south forecourt. Over the course of the next 18 months, this interim solution is to be developed and once finalised, an application, which includes the removal of the existing bag search structures, is proposed to be submitted to the LBC for approval. The interim solution is proposed to be in place for a period of 10 years from 2026. During this 10 year period a final visitor welcome solution, which will include security and bag search facilities will be developed which will be able to respond to longer term public realm initiatives in the area.

The upcoming ECP construction programme, particularly the SWEC construction phase which proposes to introduce a construction crane to the immediate north of the security structure within the south forecourt, has also been discussed with LBC officers. Officers have advised that a further application will need to be submitted to allow for the relocation of the south forecourt bag search facility to an alternative location in the south forecourt. This application will come forward later in 2025 subject to the programme for the SWEC construction.

Application content

This application has been submitted via the Planning Portal (ref: PP-13626491). This letter and the following make up the application and supporting documents:

- Application and CIL form;
- Location Plan at scale 1:1250 and Block Plan at scale 1:500, prepared by DJ Architects;
- Heritage Statement, prepared by DJ Architects;
- Design and Access Statement, prepared by DJ Architects; and
- Existing and proposed plans and elevations by DJ Architects.

The relevant planning application fee of £363.00 (including Planning Portal Service Charge £70.00) has also been submitted. This is based on the site area of 199sqm, reflecting the area of proposed structures. The temporary proposal and charitable exemption will not trigger CIL payments.

The Site

The British Museum Estate

The British 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 Museum'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 several important listed buildings, including the Grade I listed Quadrangle Building, the KEB to the north of the site, and other listed elements such as the railings and a number of lampposts around the periphery. The original, now replaced, 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

The surrounding uses include a range of commercial office, hotel, residential and education uses. The Museum is located in the Midtown BID district (Holborn, Bloomsbury, St Giles), an Archaeological Priority Area, the Background Strategic View (Blackheath), and the Central Activity Zone (CAZ). It 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 Goadge Street tube stations, and 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. The south forecourt is designated as an open space.

Heritage context and significance

Conservation Management Plan | The Museum's Conservation Management Plan (CMP), third revision dated February 2023, 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 Museum's estate is Grade I listed, being of international significance and sitting in the Bloomsbury

Conservation Area. The Site was constructed in numerous phases from Smirke's 19th century 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 is The British 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.

Heritage significance of south forecourt | A review of the heritage significance of the south forecourt is within the 2023 CMP. The forecourt creates the setting of the Grade I listed, highly significant Smirke façade. It is enclosed by the Grade II* listed main entrance and gates and houses 18 Grade II listed lampposts. It is noted that the forecourt has endured to the present time in its original layout. The forecourt, comprising its grassed lawns bounded by dwarf sandstone walls and stone setts paths, has survived as designed by Smirke but rebuilt and remodelled by Lord Foster. It measures as approximately 7,000m² of circulation space through which the public pass before entering the building. It is a defined space, and its character is principally drawn from the landscaping (hard and soft), prominent boundary railings and back-drop of the monumental south elevation. The CMP notes that the temporary security structure is a detracting feature. Subject to design and justification concerning the safety of and access to the collection, a permanent solution may be permissible.

Heritage significance of north entrance | The northern entrance to the Museum, and where the northern security facility is located, is enclosed by the Museum's perimeter wall immediately adjacent and within the setting of the KEB. The KEB was constructed as an extension to the Museum in 1906-1914. Overall, it is of exceptional architectural and historic special interest, being separately listed at Grade I. The building is an important work by the prominent architectural practice JJ Burnet. The KEB is the only executed building of a comprehensive masterplan by Burnet to enlarge the Museum to fill the entire city block and replace all surviving terraced Georgian houses around the Museum's perimeter with Museum accommodation. Whilst the masterplan did not come to pass, the galleries were built and house part of the Museum's collection. The KEB displays a symmetrical Edwardian Beaux Arts façade with a screen of Ionic columns on a podium. The listing description references the attached stone wall terminating at either side of the main entrance with carved stone lions, having crossed front paws, by Sir George Frampton.

The Bloomsbury Conservation Area | 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 the principal entrance is located south of the site aligning Great Russell Street, with a secondary frontage along Montague Place.

The Bloomsbury Conservation Area Appraisal also notes that there are a few notable local views in the area including the view north along Coptic Street, Museum Street and Bury Place and east and east and west along Great Russell Street of the BM. The BM's imposing frontage set back from the road is noted; the forecourt is considered to give a sense of openness to the CA. Mature trees, the Grade II* listed gates, railings and gateposts define the frontage and filter views towards the entrance portico.

Relevant planning history

There is an extensive planning history relating to the Museum, spanning many years. Of most relevance to this current application are the two planning applications that were granted for the existing security search facilities in situ. These were granted permission by LBC in August 2020 (ref: 2016/2524/P for the south entrance) and in September 2020 (ref: 2016/4219/P for the north entrance facility). These permissions were later superseded by the grant of permission by LBC in March 2023 (ref: 2022/3159/P) for the continued use of the single storey structures in the south and north entrances to provide an external bag search facility to the Museum for a temporary period for 2 years (expiring in March 2025).

Regarding the wider masterplan for the Museum; two permissions of note have been approved in 2024 in relation to the ECP. The first of these is SWEC and the associated incoming sub-station (ISS) for which planning permission and listed building consent was granted in October 2024 (ref: 2023/4648/P and 2023/4903/L) for the erection of a new energy centre incorporating maintenance support accommodation to internal West Road, new substation off Montague Street, all together with associated internal and external works, service runs, erection of plant, landscaping, and temporary works associated with construction following demolition of existing Energy Centre to internal West Road and removal of temporary buildings to the south of the existing energy centre on the internal West Road and to the north and east of the White Wing facing Montague Street. The second application relevant to the ECP is the Eastern Road Building (ERB) for which planning permission and listed building consent was granted July 2024 (ref: 2023/1848/P and 2023/2020/L) for the erection of a new

two storey building, plus basement and associated works to provide plant and welfare accommodation ancillary to the Museum following demolition of the existing building and two storey structures on East Road (to the rear of 9-11 Montague Street and 43 Russell Square).

The Proposals

Summary of proposals

The existing Museum buildings do not currently provide sufficient space, or suitable facilities to adequately address security entrance requirements associated with modern visitor needs and increased security threat levels at the BM. The existing buildings are also very sensitive to change, given their Grade I listed status. The Museum is, therefore, seeking to retain the temporary bag search facility structures in the south forecourt and outside the north entrance for a further 18 months while a longer-term interim solution is being developed.

The existing structures were upgraded in 2020 and have been further assessed by visitor flow experts. They have been judged to adequately meet the Museum's specific needs and requirements for bag and person checks before entry into the Museum and are proposed to remain in situ, in line with their existing location, size, height and materials. They will, however, be cleaned and regularly maintained to tidy up their appearance (please refer to Design and Access Statement (DAS) by Dannatt, Johnson Architects (DJA) for further details).

Need and use

The need for and use of the structures is also outlined in more detail within the DAS, prepared by DJA. The bag search structures in place are specifically intended to manage the threat against the Museum's collections, buildings, the public and staff. This includes the need to manage up to 20,000 visitors per day at peak times.

In recent years, to reduce risk to the public, and provide for a more considerate service to visitors, it has been essential to relocate bag searching outside of the Museum building. Of note, the main entrance is too narrow for crowd control, and there is potential for much greater damage to historic fabric if these facilities are located internally. Also, once inside the building visitors would have to double back to access the cloakroom after security, which would be extremely difficult to facilitate. The existing external structures also facilitate the spacing and timing of visitors into the Museum, while providing an adequate facility and isolated space to search visitors, trying to minimise queuing on the street, and respecting visitor privacy before entry into the main Museum buildings. They also address some of the specific challenges such as the need to minimise impact on listed fabric and maintain a sufficient distance away from the most significant attributes of the listed setting (i.e. the main Smirke portico and central colonnade).

Overall, the existing structures provide an appropriate, safe working space on a temporary basis to support the screening of high numbers of visitors away from the Museum doors and entrance halls, where there is insufficient floorspace. They allow improved entry into the Museum and reduced congestion in the entrance halls, improving fire evacuation and visitor/staff safety as well as adding to the visitor's experience. Further details relating to the BM's security requirements are enclosed in the DAS.

Timescales and Strategy

Timescales | The existing bag search structures are a temporary solution to address critical security risks and manage safe public access to the Museum while it develops its medium term strategic plans for a visitor welcome pavilion over the next 18 months. Therefore, permission is sought for the existing temporary structures to remain in situ for a further 18 months.

Any lesser period than 18 months will be insufficient for the Museum to realistically develop an alternative, interim solution to replace the important visitor function that the security structures perform. The solution must be holistic and consider other potential major workstreams that will come forward in line with the Museum's site-wide master planning currently underway. It will require an estimated 18 months from the time of approval of this application for the interim solution to come forward. It is considered that this period of time will be sufficient for the development of a design solution, statutory planning approval, and construction works to take place and become operational.

An indicative high-level programme of works to be carried out while the interim solution is developed and submitted for approval is as follows:

Year	Museum's development of medium-term interim solution
Late 2024	<ul style="list-style-type: none">Design competition concludes and winner announced

Early 2025	<ul style="list-style-type: none"> • Strategic Definition and approach • Design development • Stakeholder consultation •
Mid- late 2025	<ul style="list-style-type: none"> • Detailed development of security solution • Submission of application
2026	<ul style="list-style-type: none"> • Construction of the medium term structure • Removal of the existing security structures

Strategy | The proposed strategy has been carefully considered to provide the best approach to an interim security provision which seeks to improve the visitor experience and remove the temporary security structure. The proposed strategy for the future of the Visitor Welcome at the British Museum comprises the following:

1. Seeking permission for the retention of the north and south security structures in the current locations for a further 18 months from expiry in March 2025, allowing them to remain in situ until September 2026.
2. Subject to the SWEC construction programme, permission is sought for the temporary revised relocation of the south forecourt security structure to allow for the installation of the SWEC construction crane for its duration on site.
3. Seeking permission for the medium term interim security solution coupled with the removal of the temporary security structures estimated to be submitted in mid-2025 for construction to be completed by September 2026 and in place for a period of 10 years.
4. Development of the permanent visitor welcome pavilion to address the Museum’s needs and respond to wider public realm initiatives

Planning Framework and Assessment

The policies within The National Planning Policy Framework 2024 (NPPF) including the Planning Practice Guidance (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.

LBC are currently in the process of preparing a new Local Plan. The Council published the Regulation 18 Consultation Version of the Draft New Local Plan in January 2024 and held a consultation on the draft Local Plan from 17th January to 13th March 2024. LBC are currently considering all responses with the view to publish an updated version of the Local Plan for consideration in due course, aiming for the end of 2024.

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 (December 2024) requires heritage assets to be conserved in a manner appropriate to their significance. Paragraph 203 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 212 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 215 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 adopted London Borough of Camden (LBC) Local Plan (2017) 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.

Chapter 12 of the Draft New Local Plan addresses Heritage and Design, with D1 (achieving design excellence) and D5 (Heritage) being of note. The Draft New Local Plan is of some relevance, although it is not at an advanced enough stage to be apropos or a material consideration currently.

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.

Assessment | The Museum's Bloomsbury estate includes two Grade I listed buildings of international significance and other Grade II* and Grade II structures (including the gates and railings and lampposts). It is also set within the Bloomsbury Conservation Area. Other listed buildings are in the vicinity, on Great Russell Street and Montague Place. The north and south entrances form the key approach to The British Museum and are acknowledged to be important to the wider setting and collection of heritage assets.

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. The entrance sequence is an important part of the Museum's visitor welcome and circulation circuit, which is also significant in the context of providing public access to the collection.

A clear need for the proposed temporary security structures has been identified, namely stemming from the need to keep visitors and the collections safe and the inability to provide bag search facilities within the main Museum building. Detailed analysis has been undertaken on the function, size and specific requirements for bag search facilities to support this. Alternative medium and long-term solutions are under consideration but need more time to develop in a cohesive and integrated way to align with wider developments at the Museum. The first part of this process is anticipated to take 18 months to deliver.

Meanwhile, the current and proposed solution meets all of the Museum's basic security needs in the most efficient way. Therefore, at this time, there are no proposed changes to the existing security structures in situ, except that they will be cleaned to address wear and tear and maintain a tidy appearance.

While the structures are acknowledged to cause some temporary, less than substantial harm to the setting of the Museum (in line with terminology and paragraph 215), this is mitigated substantially by the pressing need and role they perform and the overriding associated public benefits in keeping visitors and the collections safe. The structures also do not have any long-term or permanent impact on the highly significant setting of the Museum, or the openness of the forecourt. They are completely reversible. They are not fixed to any fabric and can be removed when the interim proposals come forward in the future. The structures are placed away from the principal central view of the portico of the Museum (to the south) and also sit behind the existing railings and boundaries to the north and south, meaning that they are not dominant from the views into the site from the Bloomsbury Conservation Area.

Summary

The British Museum is one of London's most crowded spaces, an iconic British institution and one of the most visited tourist attractions in the United Kingdom. As a result, it needs to be safeguarded, 50% of its circa six million visitors enter the building (in peak times) via Great Russell Street and the remaining 50% of visitors use the Montague Place entrance. The existing security structures were installed to protect the public, staff, collections and building from the high terrorist threat level. This threat has not changed, and the security facilities are essential to protect visitors and staff and the Museum as a whole, allowing everyone to appreciate the listed building and the collection within. They are also firmly integrated into the Museum's daily operations and become an integral part of the visitor entry experience, which is very common for major attractions in London. There will be no change to the security structures as part of this application, so there will be no additional harm to the appearance of the listed buildings and conservation area. Any less than substantial harm to the setting is

minimised through their careful placement and balanced overall against the significant public and heritage benefits that they deliver - namely keeping visitors and the collections safe. The proposal to retain the security facilities at both entrances for a period of 18 months will also give the Museum enough time to design and deliver its interim solution.

The proposals are, therefore, considered to meet the requirements of the relevant London Plan and LBC Policies, alongside other material considerations within the NPPF. The proposal will support the care and display of the collection and improve the overall visitor experience, which in turn will help the Museum meet its objectives and maintain its international reputation, meet the objectives of Policies D1 and D2, and thus continue to enhance its status and significance.

In accordance with the agreed terms of the Museum's 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 Vicky Cartwright, Melanie Gurney or Shonagh Ramsay on 020 7257 2363 or email melanie@theplanninglab.com or shonagh@theplanninglab.com.

Yours sincerely,

The Planning Lab