

7 January 2025

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

Dear Officers

Listed building consent application| Security improvement works to three doors in the British Museum, London WC1B

Introduction

On behalf of the Trustees of the British Museum (BM), we enclose an application for a listed building consent to improve the security arrangements to three doors in back of house areas in the British Museum, Great Russell Street, London, WC1B 3DG.

The BM requires enhanced security to three doors, this involves upgrades to the doors and access arrangements. The works will provide auditability of access and ensure there is no solo access into the rooms. This will address the BM's security requirements.

The proposed works were discussed with LBC and HE officers at the quarterly meeting on 20th June 2024. This advice has been considered in the development of the proposals. The proposed description of development is:

"Alterations to upgrade three existing doors within back of house areas in the British Museum".

Submission content

This application has been submitted directly to LBC via email. The nature and content of the application mean the documents should not be publicly accessible. This approach has been discussed with LBC and it has been agreed the site plan and description will be uploaded to the LBC public access only. The following forms the submission and supporting documents:

- Application form;
- Drawing pack, prepared by Dannatt, Johnson Architects;
- Design & Access and Heritage Statement, prepared by Dannatt, Johnson Architects.

There is no fee for an application for listed building consent.

The Site

British Museum Estate | The BM 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 original elements of BM date back to 1755- 1822 when Montague House was purchased to house the new BM 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. The BM is Grade I listed and is bounded by Montague Place, Montague Street, Bloomsbury Street and Great Russell Street.

This application relates to two doors in the East Wing at Level 1 and one door at Level 0 in the King Edward Building (KEB).

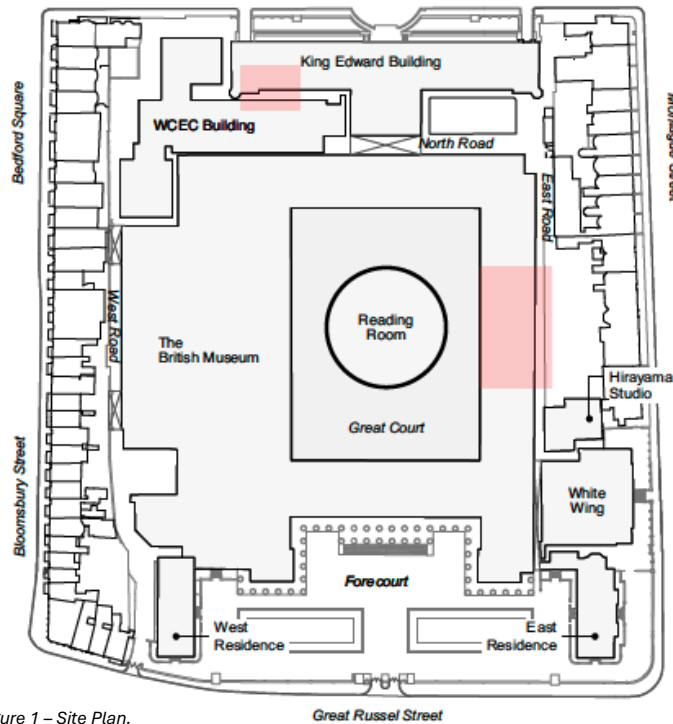


Figure 1 – Site Plan.

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 historic designations that apply to the application site are as follows:

- BM - Grade I Listed
- Main entrance gateway, railings and attached lodges to the BM – Grade II* Listed
- Eighteen lamp posts on the forecourt of the BM – Grade II Listed
- BM King Edward VII Galleries and attached wall and lions – Grade I Listed
- Bloomsbury Conservation Area

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 Gode 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 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 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 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'.

Relevant to this application, the door in the KEB is not specifically allocated a significance, however it is in an area of medium significance. Similarly, the two doors in the East Wing have not been specifically identified but they are located in an area of very high significance.

Planning History | The British Museum has a vast planning history, there has been many applications over the years to improve security across the site including hostile vehicle management bollards (ref: 2018/5342/P), temporary security tents outside the south and north forecourt (ref: 2022/3159/P).

Proposal

The BM identified a need for improved security on three doors which include two doors in the East Wing at Level 1 and one door at Level 0 in the KEB. The works are considered essential in order to ensure the safety and security of the collection. The proposed works include installing a new timber frame around each of the existing steel doors to allow for a new heavy duty solid core flush door to be fitted on the corridor side. There will be a new lock and card reader with a pin pad added.

The timber frame will be securely attached to the face of the masonry wall using steel brackets concealed from view in the finished work. As far as practicable, the fixings will be located in the mortar joints. Minimal additional penetration to the fabric will be carried out to accommodate the cabling required for the door access control device. These secondary doors will allow the new access control hardware and cabling to be fitted without any impact on the existing doors. The proposed doors are fully reversible as they can be removed in the future and the fixings made good.

Planning policy context

The policies within The National Planning Policy Framework 2024 (NPPF) (including the NPPG); and the Development Plan form material considerations in the determination of this application. The Development Plan is formed of GLA's London Plan (LP) 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.

Additionally, a Regulation 18 consultation on the draft new Camden Local Plan (January 2024) took place from 17 January to 13 March 2024. No further consultations have taken place yet, therefore this holds limited weight.

The adopted LBC planning policies most relevant to the consideration of the works presented as part of this application include D1 (Design), D2 (Heritage), A1 (Managing the impact of development) and C5 (Safety and security). 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 (paragraph 215). 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 D1 requires development to be of sustainable and durable construction, which respects the local context and preserves the heritage assets and is designed to minimise crime and antisocial behaviour.

LP 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 to provide effective and improved security to these rooms at the BM to ensure the safety of the collection while still respecting the museum's architectural and cultural significance. The installations are all internal and in back of house areas. There is no external impact and as a result there will not be any impact on the Bloomsbury Conservation Area.

In accordance with paragraph 207 of the NPPF great weight has been given to the asset's 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 215). Policy HC1 of the London Plan also states developments should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. Policy D2 of the Local Plan does not permit the loss of or substantial harm to a designated heritage asset. These policies reflect the aims of the NPPF, with developments that propose less than substantial harm being required to be convincingly outweighed by the public benefits of the proposed works.

The existing doors are made of metal. Door A/1/046/D693, located in the east wing, was opened between 1966 - 1985 through a wall that it was originally constructed under Robert Smirke's masterplan. Door A/1/046/D663, also located in the east wing, is understood to have been introduced c.1845-1865 under Sydney Smirke. The door in the KEB, F/0/094/D150, is surrounded by medium significance fabric, it is located in an area constructed between 1886- 1935. The proposed timber frames will be attached to the surrounding masonry of the existing doors. The proposed doors will be finished to match existing doors and these will be painted to match adjacent doors. They have been carefully considered so they appear appropriate to the context of the space. These doors are located in the back of house area and therefore will never be seen by the public.

The submitted HIA states that the proposals overall will result in the lowest end of the scale of 'less than substantial harm'. The new additional security for these doors has been designed carefully to align with Conservation Plan Policy 4.18, which requires services installations to have the minimum impact and are architecturally appropriate on the character of the space. The timber frame will provide a screen to tuck all the associated cables away so they do not visually clutter the doors and the surrounding space which will be a heritage gain. The proposed works to the doors have been carefully designed to minimise the number of interventions and new routes in existing fabric required. The fixings will be located in the mortar joints where possible. Furthermore, it states as the installations are fully reversible, with minimal repair work to fill in the holes if required. There will be no damage or alteration of existing fabric if removed in the future.

The HIA therefore concludes that the proposal will result in the lowest end of the scale of 'less than substantial harm', when measured against NPPF paragraph 208. The works are essential to improve the security of the BM, and the less than

substantial harm is greatly outweighed by the public benefits which will ensure the continued safe operations and protection of significant artefacts within the BM for the public to enjoy. This proposal is, therefore, also in accordance with the NPPF, LBC policies D1, D2, C1, C5 and CC1, as well as LP policies HC1.

Conclusion

The proposed works are essential to provide secure access to BM staff and sufficient protection for important and significant objects within the BM. These additional installations to the doors will allow BM to closely monitor access into these rooms. Their design is sensitive to the BM's architectural and cultural significance, and the HIA therefore has concluded that the proposal will have an overall result in the lowest end of the scale of 'less than substantial harm'. This less than substantial harm is also greatly outweighed by the public benefits to protect the BM's collection for visitors to enjoy and appreciate. Overall, the proposal will support BM's function and thus enhances its international important status. The proposals will also enhance the security of the collection within the building and therefore comply with the local and national policies.

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 Melanie Gurney at melanie@theplanninglab.com or Shonagh Ramsay at shonagh@theplanninglab.com.

Yours faithfully,

The Planning Lab