

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

25 July 2022

Dear Elaine and Catherine,

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

Introduction

On behalf of the Trustees of The British Museum, we enclose a planning application to support the retention of the two temporary security search structures at the south and north entrances of The British Museum, London, WC1B 3DG. The Museum proposes to retain the existing structures in their current form and location for a four-year period. The proposed description of development for the planning permission is: *Temporary retention of entry security facilities at the south and north entrances of The British Museum.*

The British Museum is one of the UK's leading visitor attractions, regularly welcoming over 6 million visitors a year to its Bloomsbury site (prior to Covid-19). The total attendance each day varies by season and was markedly affected by Covid-19. 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 70% (pre-covid) 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 30% (pre-covid) 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 (expiring in August and September 2022). 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 these 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 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. Pilot projects are also underway to measure the benefit of introducing emerging technologies to complement the search process. At the same time, the Museum is working to understand the impact of potential major projects to deliver a holistic and coordinated approach overall. While these important assessments are underway, the existing structures are required to be retained in situ for a further four years.

The on-going need for the facilities has been discussed in detail with LBC officers, including at a meeting on 17th March 2022 (and follow up site visit on 31st March 2022). A meeting to discuss the facilities in the context of potential upcoming major projects took place between the Chief Executive of Camden Council and the Director of the British Museum on 23rd March 2022 and a further follow up meeting with Dan Pope and Bethany Cullen on 16th June 2022. These discussions have informed the proposals presented as part of this planning application.

Application content

This application has been submitted via the Planning Portal (ref: PP-11156100). 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 Wright and Wright Architects (W&W Architects)
- Design and Access Statement by W&W Architects, which includes a heritage commentary
- Existing and proposed plans and elevations by W&W Architects, including drawings:
 - Existing Location Plan (drawing no. 001A)
 - Existing Block Plan (drawing no. 002)
 - Proposed South Forecourt Security Tents Plan (drawing no. 200A)
 - Proposed South Forecourt Security Tents Elevations 1 (drawing no. 210A)
 - Proposed South Forecourt Security Tents Elevations 2 (drawing no. 211A)
 - Proposed South Forecourt and Montague Place Security Tents Sections (drawing no. 220A)
 - Proposed Montague Place Security Tents Plan and Elevations (drawing no. 230B)
 - South Forecourt Plan Existing Pre2016 (drawing no. 100A)
 - South Forecourt Elevations 1 Existing-Pre2016 (drawing no. 110A)
 - South Forecourt Elevations 2 Existing Pre2016 (drawing no. 111)
 - Montague Place Plan & Elevation Existing Pre2016 (drawing no. 130A).

The relevant planning application fee of £266.20 has also been submitted. This is based on the site area of 199sqm, reflecting the area of proposed structures. The temporary proposal 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 Montagu 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 Goodge 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) was originally adopted in 1999 and later revised by Purcell Architects in 2007/8. Updates to the CMP are currently being progressed. The current CMP contains a detailed appraisal of the significance of the Museum 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 2007 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 with its grassed lawns bounded by dwarf sandstone walls and stone setts paths have all survived as designed by Smirke but rebuilt and remodelled by Lord Foster. It is an approx. 7,000m² 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.

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.

Relevant planning history

There is an extensive planning history relating to The British Museum, spanning many years. Of most relevance to the proposal that is the subject of 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).

The proposals

Summary of proposals

The existing Museum buildings do not provide sufficient space, or suitable facilities to adequately address security entrance requirements associated with modern visitor needs and increased security threat levels. The existing buildings are also very sensitive to change, given their Grade I listed status. The Museum is, therefore, seeking to retain the temporary security search facility structures in the south forecourt and outside the north entrance for a further four years.

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 (see further details set out in Design and Access Statement (DAS) by W&W Architects).

Need and use

The need for and use of the structures is also outlined in more detail within the DAS, prepared by W&W Architects. The security 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. 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, avoiding 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 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.

Timescales

The existing security structures are a temporary solution to address critical security risks and manage safe public access to the Museum while it considers its medium- to long-term strategic plans. This will take a number of years to resolve and deliver and, for this reason, permission is sought for the existing temporary structures to remain in situ in the shorter term for four years.

Any lesser period than four years will be insufficient for the Museum to realistically find an alternative 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. Of note, the south forecourt could play a key role in a number of potential upcoming planned major projects, which was discussed between the Chief Executive of Camden Council and Director of The British Museum on 23rd March 2022. It will require some time for the long-term solution to come forward. It is considered that this period of time will be sufficient for the necessary investigative works, medium-term design solutions and construction works to take place and become operational.

An indicative high-level programme of works to be carried out while the temporary solution is in place is as follows:

Year	Museum’s development of medium-term proposals	Museum’s development of long-term proposals
2022	Masterplan and other related projects <ul style="list-style-type: none"> • Strategic Definition • Business Case development and funding sought for Medium Term Proposal for Visitor Search Facilities 	Feasibility of potential major projects
2023/24	Medium Term Proposal – transitional model (Visitor Security Facilities) <ul style="list-style-type: none"> • Feasibility Stage • Stakeholder Consultation 	Ongoing development
2024/25	Medium Term Proposal – transitional model (Visitor Security Facilities) <ul style="list-style-type: none"> • Design Development and Planning discussions for Medium Term Proposal 	Ongoing development
2025/26	Medium Term Proposal – transitional model (Visitor Security Facilities) <ul style="list-style-type: none"> • Completion of Designs, Procurement and Tender Process • Completion of Construction and operation subject to planning and approvals • Masterplan and other related projects design development continues. 	Ongoing development

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.

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. This process is anticipated to take 3 years.

Meanwhile, the current and proposed solution meets all of the Museum's 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, minor (less than substantial) harm to the setting of the Museum (in line with NPPF terminology and para 202), this is mitigated substantially by the pressing need and role they perform and the overriding associated public benefits as identified above. 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

medium- to long-term 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. 70% of its circa six million visitors enter the building (in peak times) via Great Russell Street and the remaining 30% of visitors use the Montague Place entrance (prior to Covid). The existing security structures were installed to protect the public, staff 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, so there will be no additional harm to the appearance of the listed buildings and conservation area. Any minor '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 four years will also give the Museum enough time to design a medium- to long-term 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 Kelly Ryder or Melanie Gurney on 020 7257 2363 or email melanie@theplanninglab.com.

Yours sincerely,

The Planning Lab