

**TWENTIETH  
CENTURY  
SOCIETY**



David Fowler  
Principal Planning Officer  
Regeneration and Planning  
Culture and Environment  
London Borough of Camden

Sent by email: [David.Fowler@camden.gov.uk](mailto:David.Fowler@camden.gov.uk)

25 February 2016

Our ref: 16 03 08

Dear Mr Fowler,

**Central Somers Town Covering Land At Polygon Road Open Space, Edith Neville Primary School  
174 Ossulston Street And Purchase Street Open Space London NW1  
Planning application ref 2015/2704/P**

Thank you for consulting the Twentieth Century Society on the above application. The British Library, a landmark Grade I listed twentieth century building, lies to the south of the proposed development site. The Society wishes to comment on the proposals as set out below.

#### Proposals

The application is for approval of a masterplan to re-develop the central Somers Town area. The development site, located in a largely residential area at the heart of Somers Town, covers an area of 2,2 hectares. It is bounded to the west by Euston Station, to the east by St Pancras station and to the south by the newly constructed Francis Crick Institute and, to the south of that, the British Library. The site is divided into 7 sub-areas or plots. Our concern specifically relates to sub-area 7, the Brill Place residential tower block. This block is proposed to be built immediately to the north of the Francis Crick Institute and, at 25 storeys, towers over even that large-scale building. We therefore believe it has the potential to be visible in critical views of and from the British Library.

#### Significance of the British Library

The British Library was designed by Sir St John Wilson, with M.J. Long, in 1975-8 and built 1982-99. It is a landmark building on a wedge shaped site bounded by the Euston Road to the south, Midland Road to the east and Ossulston Street to the west. It was listed at Grade I in 2015 in light of its national historic and architectural significance. In order to merit a Grade I listing a building must be of 'exceptional interest'; only 2.5% of listed buildings are Grade I. The principle reasons for its listing include: 'architectural interest: for its stately yet accessible modernist design rooted in the English Free tradition with Arts and Crafts and classical influences, crisply and eloquently contextualised by its massing and use of materials which respect and contrast to the St Pancras station and hotel. . . .

The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ



Group Value: with the Grade I St Pancras Hotel, Grade II Camden Town Hall and Grade II housing on Ossulston Street.'

The aim of the architect was to create an environment that was 'vivid, pleasurable and memorable, while fitting with responsibility and sensitivity into its context'. As this indicates, the context was critical to the design. The building makes many references to the adjoining St Pancras Station and Hotel: the use of brick (with the same clay used for the British Library); the colours; the stepped, slate-covered roofs; the sweeping horizontal layers. This relationship was recognised in the listing details, which note its contextualisation and the group value with the neighbouring buildings.

The piazza forming the main entrance to the British Library was equally central to the design. The 'generous courtyard . . . distances the entrance from the busy Euston Road. The courtyard, designed as a public space, is an important prelude to the Library itself, entered near the SW corner' (Cherry, B., Pevsner, N, *The Buildings of England: London North* (1998), pp 373). It includes a number of important works of art, including Eduardo Paolozzi's *Newton*, an integral part of Wilson's composition.

#### National Policy

Paragraph 132 of the NPPF 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. It adds that significance can be harmed or lost through alteration or destruction of the heritage asset or *development within its setting*. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of Grade I listed buildings should be 'wholly exceptional'. Under the Planning (Listed Buildings and Conservation Areas) Act 1990, decision makers should give considerable importance and weight to the desirability of preserving the setting of listed buildings.

#### Twentieth Century Society comments

We have major concerns about the potential impact of the proposed development on the Grade I listed British Library and its setting, and do not believe the application documentation includes sufficient information on which to assess that impact. The Heritage, Townscape and Visual Impact Appraisal document submitted with the planning application shows only one view of the British Library, a carefully selected view of the Portico at the southwest entrance to the piazza. It is impossible to assess any potential impact of the tower on views of the Library from this single photomontage: the proposed location of the tower is behind a tree. There are no images from the piazza itself, or from the landscaped roof terraces along the north façade of the Library building, from which views of the tower would, we believe, be evident. We believe the same could be true in middle and longer distance views from south of the Euston Road.

In our view, the 25 storey Brill Place tower could cause significant harm to the architectural significance of the British Library by virtue of its considerable height, design and massing. As shown in the diagrams of scale and massing on pages 59 and 97 of the Design and Access Statement, the tower indeed towers over the Francis Crick Institute building, which although bulky is only 8 storeys. We believe it is thus likely that the tower would be visible from the British Library and in views of the Library from the south. The proposed style, scale and massing of the tower is completely at odds with the careful referencing between the Library and St Pancras station and hotel. The extreme verticality of the tower would contrast awkwardly with the general horizontality of the Library and St Pancras station. We believe it could visually compete with the Library building and thus diminish the Library's current landmark status.

As recognised on page 98 of the Heritage, Townscape and Visual Impact Appraisal document, the setting of the Library extends over a fairly wide area, due to the scale of the building. We consider that the proposed Brill Place tower could cause harm to the significance of the Library and its setting. Such harm should be 'wholly exceptional' and should be justified by clear and convincing evidence.

We do not believe that evidence has been provided in this case. In order for us to fully assess the impact of the 25 storey Brill Place tower, we would need further information, including at a minimum winter and summer views from the Portico and from the piazza itself, as well as medium and longer views from south of the Euston Road. Please provide this missing information so that we can comment meaningfully on the effect of the proposed works on the listed British Library. In the absence of this information, we are unable to comment conclusively on the merits of the proposal.

I trust our comments will be useful to you in your consideration of the proposals.

Yours sincerely



Henrietta Billings  
Senior Conservation Adviser  
**Twentieth Century Society**

**Remit:** The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.