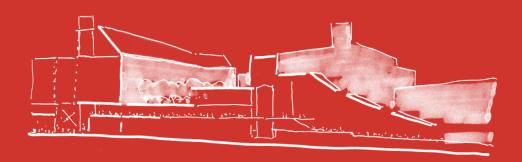
The British Library Extension February 2022

Planning Statement





The British Library Extension Planning Statement

On behalf of: 'SMBL Developments Limited' and 'The British Library Board'

21 February 2022



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17 Summary and Conclusions



1 Executive Summary

- 1.1 This Planning Statement provides a comprehensive review of the relevant national, regional and local planning policy in relation to the British Library extension proposals (the 'Proposed Development'). It sets out the planning justification for the Proposed Development and contains a detailed assessment in relation to relevant development plan policies, other material planning considerations and the statutory duties in respect of the historic environment and Crossrail 2.
- 1.2 The Proposed Development for which planning permission and associated listed building consent is sought, can be described as follows:

"Alterations to existing British Library building including demolition of the existing British Library Centre for Conservation and construction of a new building of up to 12 above-ground storeys and one basement level for use as library, galleries, learning, business and events spaces (Class F1) and retail and commercial spaces (Class E); provision of internal and external public spaces, landscaping and a community garden; improvement works adjacent to Dangoor Walk; provision of cycle and car parking and servicing facilities; provision of Crossrail 2 infrastructure; means of access; and all associated works and infrastructure."

- 1.3 In recent years the British Library has acknowledged the anticipation of transformative shifts in the way knowledge is created, shared and harnessed for innovation, and recognises the unique role that it plays at a time of transformation. The Library is therefore committed to rebuilding and expanding its own spaces and services to adapt to these shifts, in order to fulfil its purpose as a national library in the 21st Century.
- 1.4 However, many parts of the existing site are currently vacant or underused, with the exception of the Story Garden and the British Library Conservation Centre (BLCC). Whilst the BLCC offers an interesting addition to the Library, its location now restricts the effective use of peripheral areas of land that are necessary for the long-term health and flexibility of this national institution.



- 1.5 This under-utilised land has therefore been identified by both the Library and LB Camden as land appropriate for an extension to the existing Library. In 2015, a development partner was subsequently sought in order to help bring forward this development intention.
- 1.6 As such, these applications for planning permission and listed building consent are being brought forward by a joint venture between Stanhope Plc (Stanhope) and Mitsui Fudosan UK (Mitsui), known as 'SMBL Developments Limited' (SMBL) in partnership with 'The British Library Board', together known as the 'Applicants'. The British Library is the national library of the United Kingdom (UK) and represents one of the largest libraries in the world, giving public access to the world's most comprehensive research collection with over 170 million items. Stanhope and Mitsui have a proven track record of delivery of exemplary commercial and mixed-use developments across London, including life-science.
- 1.7 The Proposed Development is unique in combining the delivery of three strategic priorities for Camden, London and the UK: (i) an extension of a national institution (the British Library); (ii) the delivery of a major commercial, including lab-enabled, development within the Knowledge Quarter Innovation District (KQID); and (iii) the provision of Crossrail 2 (CR2) infrastructure to a safeguarded site.
- The British Library's mission is to 'make our intellectual heritage accessible to everyone, for research, inspiration and enjoyment'. To contribute towards the fulfilment of this mission, the British Library published their 'Living Knowledge' strategy in 2015 in the lead up to their 50th anniversary in 2023. In 2020 this strategy was updated to reflect a 'Living Knowledge For Everyone' agenda. The strategy sets out the actions that the British Library will commit to undertaking in response to the following six key objectives: custodianship, research, business, culture, learning and international impact.
- The Proposed Development brings forward a package of transformative benefits through the British Library's 'Living Knowledge For Everyone' initiative, which is consistent with the Government's wider ambition to reinforce the UK and London as a global centre for research and technological advances. The Proposed Development presents the opportunity to deliver

^{1 &#}x27;Living Knowledge for everyone: The British Library's role in renewal', The British Library (October 2020)



a once-in-a-generation transformation to extend the British Library, making it the most open, creative and innovative institution of its kind anywhere in the world.

- 1.10 In addition to this and in direct response to the Covid-19 pandemic, in the coming years the British Library will focus especially on economic growth and innovation by supporting UK entrepreneurs and small businesses; investing in major infrastructure; and supporting UK science, research and innovation. They will also focus on social and cultural renewal by bringing people together through libraries; increasing access, engagement and diversity; and contributing to its international impact. All of which will be made possible through the proposed expansion of the British Library. A new long-term strategy for the Library will be published in 2023 on the Library's 50th anniversary.
- 1.11 The commercial, including lab-enabled, floorspace to be provided within the Proposed Development represents an excellent opportunity to increase the critical mass of Knowledge Quarter uses and employment floorspace at the heart of the Knowledge Quarter (KQ), helping to further establish the area as a world-leading location for innovation, research and development. The commercial floorspace, including lab-enabled space, would deliver more than 3,000 jobs and enable a programme of public benefits, which have been developed in line with Camden 2025 initiatives. The commercial floorspace would also deliver substantial improvements to the external public realm, making the currently unattractive and inactive area welcoming, inviting and accessible to all.
- 1.12 The scheme would ensure that the Government's proposals for CR2 are safeguarded through the delivery of CR2 infrastructure. By facilitating the delivery of CR2 infrastructure, the scheme would help to contribute towards CR2's expected provision of a £150bn boost to the UK's economy, unlocking 200,000 new homes and supporting 200,000 new jobs. The direct cost of CR2 to the Proposed Development would be £59.2m (as set out in the Financial Viability Assessment, prepared by Gerald Eve LLP).
- 1.13 The scheme would meet the London Borough of Camden's (LB Camden's) ambitions for a successful Knowledge Quarter Innovation District (KQID) which seeks to directly improve the lives of local communities in which the development sits economically, socially and environmentally. The proposed development would create, both during construction and three years of operation, public benefits with a social value totalling over £27.2m (as set out in the Social Value Framework, prepared by Arup). The social value generated is in addition



to the anticipated economic value increase to be delivered by the Proposed Development, an assessment of which has been set out in Arup's Economic Value and Knowledge Quarter Uses Statement.

- 1.14 The Proposed Development would involve extending the northern aspect of the existing British Library to provide library accommodation; commercial space designed to cater for Knowledge Quarter uses (including life sciences and data sciences); retail space; and the Crossrail 2 works at basement level.
- 1.15 The Proposed Development would provide a gross internal area (GIA) of up to approximately 97,000m2. The new library accommodation, including a publicly accessible foyer, and space for the Alan Turing Institute (ATI), would be provided at approximately 10,000m2 in addition to a replaced British Library Centre for Conservation (BLCC) and BL tank farm and other library infrastructure. Approximately 76,000m2 (GIA) would be provided for commercial space together with retail. Infrastructure related to CR 2 would be provided at approximately 4,300m2 (GIA), plus a shaft descending between basement levels 2-7. With respect to CR 2, the Proposed Development would provide the main civils and structural elements of the Euston St Pancras Station eastern shaft and passenger subway tunnel. There would be adaptions to existing library operational areas, including the loading bay.
- 1.16 The Proposed Development would be 'car lite' with five wheelchair-accessible car parking spaces, four operational spaces for maintenance vehicles and a single minibus bay.
- 1.17 The BLCC and the temporary Story Garden are located within the Site. In order to facilitate the construction of the Proposed Development, the BLCC would be relocated, and a new community garden would be created within the Site.
- 1.18 The proposed building incorporates publicly accessible Library spaces which include a foyer at ground floor with equal entrances on Ossulston Street and Midland Road. The development would also deliver essential CR2 infrastructure in an innovative way which ensures that the external public realm at the Site is of an excellent quality and that the amenity of surrounding occupiers is protected. The Applicants are proposing high quality landscaping across the Site, including the delivery of a 'Community Learning Garden' which it is intended to be co-designed, and used by the local community. Models for comanagement of the space with the local community are also being explored.



- 1.19 The proposed building has been designed by Stirling Prize winning architects, Rogers Stirk Harbour and Partners (RSHP) who have extensive experience working on institutional buildings including the British Museum. The public realm and landscaping has been designed by DSDHA who led on the spatial strategy for the West End Project along Tottenham Court Road, the Central Somers Town project, Prince's Circus and Museum Street.
- 1.20 The existing Site contains the BLCC, built in 2007, and the 'Story Garden', introduced to the site as a temporary meanwhile use while their permanent location is being completed. The Site has historically been earmarked for redevelopment to provide an extension to the British Library. Plans from the development of the original Library building envisaged a larger design, extending into the Site. The current Library plans were reduced in scale, because of funding constraints, and the drawings dating from the re-design clearly note the Site as 'Land intended for extension' (see Image 1 on page 29). The site represents a vastly underused site in the heart of the KQ, its empty and underdeveloped nature sits in stark contrast to its context within this prominent, strategic Central London location. The site is next door to the Francis Crick Institute (FCI), a key KQ occupier, who have been closely consulted on the proposals.
- 1.21 The Site does not contribute to the character and appearance of the Grade I Statutory Listed British Library, the setting of nearby listed buildings, or the King's Cross Conservation Area. It also does not contribute to the more general townscape and public realm of the area.
- 1.22 The Site lies in the heart of the KQ which is one of the densest concentrations of scientific and knowledge-based organisations anywhere in the world, creating an incubator for the UK. The KQ is defined as the area within a 1-mile radius around King's Cross. Recently the KQ has seen the introduction of key occupiers such as The FCI and Google alongside established occupiers including The Welcome Trust and the founding KQ partner, the British Library. The Proposed Development presents a significant opportunity to consolidate and expand the concentration of KQ uses around St Pancras and Kings Cross, immediately next door to the FCI. The proposals would significantly contribute to the KQ as a cluster of innovation.
- 1.23 The Site is allocated for "development that meets the future operational needs of the British Library and/or a mix of uses including other complementary Central London uses which could include offices, culture, tourism, leisure, housing and community use" in Camden's adopted 2013 site allocation document (Site 5).



- 1.24 In February 2020, LB Camden commenced the consultation on its Draft Site Allocations Plan. This Plan has recently been consulted on again. Whilst the draft site allocations document currently holds limited weight in the assessment of the proposals, the scheme has been developed with regard for LB Camden's future aspirations for development in this location, as set out in the draft policy wording.
- 1.25 The draft site allocation allocates the site for "a mixed-use development that complements and supports the expansion plans and future service needs of the British Library, including cultural, commercial and community uses and in particular uses related to the knowledge and innovation economy".
- 1.26 The Site presents numerous planning, design and environmental considerations which have been carefully considered during the evolution of the proposed scheme. The development potential of the Site in terms of land use, height, bulk and mass and sustainability credentials has been forensically considered in the context of the surrounding uses. Potential effects upon listed buildings (including the Grade I listed British Library building itself), the adjoining Kings Cross Conservation Area, daylight and sunlight levels of neighbouring properties, views and streetscape have also been considered in detail. Within this context, the site clearly represents a major opportunity for development, being an under-utilised site, located in a strategic location immediately opposite the international transport hub of King's Cross / St. Pancras and the leading international centre for research and development, the FCI
- 1.27 The submission of this application for planning permission and listed building consent follows close consultation with planning, design, conservation, sustainability, inclusive economy, highways and public realm officers at LB Camden as well as statutory bodies such as Historic England (HE), the Greater London Authority (GLA) and Transport for London (TfL) and interested third parties.
- 1.28 The local community, especially those residents of the St. Pancras and Somers Town ward have been consulted with extensively. This includes:



- a. 13,399 newsletters delivered to local householders and businesses;
- b. commissioning groups [see Section 6 for further details];
- c. 2 x Development Management Forums (held: 2 February 2021 and 25 May 2021); and
- d. 5 x webinars held with local stakeholders (held: 12th, 19th and 26th November 10th and 16th December 2020); and
- e. a dedicated website, freephone consultation line and email address.
- 1.29 The Proposed Development is informed by a study of the merits of the existing BLCC building both from a heritage perspective and additionally from a whole life-cycle carbon approach looking at the carbon footprint associated with the demolition of the existing building.
- 1.30 A comprehensive townscape analysis has informed the bulk, massing and design of the Proposed Development to ensure that it relates to its surroundings and respects the nearby heritage assets, whilst extending a world class library and creating a new commercial building, including lab-enabled floorspace, in this prominent Central London location.
- 1.31 In terms of environmental credentials, the proposed building will aspire BREEAM 'Outstanding', with a minimum target of BREEAM 'Excellent'. Overall, the proposals would result in an overall regulated carbon emissions reduction of 39% against the Part L baseline.
- 1.32 LB Camden sets out its vision for the Borough in its Camden 2025 Vision, which includes a series of 'call to action' points that it seeks to deliver over the next 5 years. These include:
 - i. Everyone in Camden should have a place they call home;
 - ii. Growth in Camden should be strong and inclusive everyone should be able to access the work that is right for them;
 - iii. Camden should be safe, strong and open, and everyone should be able to contribute to their community;
 - iv. Camden should be a clean, vibrant and sustainable place; and
 - v. Everyone in Camden should be able to live a healthy, independent life.
- 1.33 In support of this vision, LB Camden has implemented a number of initiatives including:
 - i. Camden's STEAM (Science Technology Engineering Arts and Maths) initiative which aims to promote Camden's successful creative and knowledge economy



and to ensure businesses succeed by having access to diverse and young local talent. The STEAM commission was established to:

- a. Highlight Camden's unique STEAM economy and the skills needed for the roles of the future;
- b. Encourage greater fusion in creative, digital and scientific education;
- c. Mobilise business resources to drive skills and careers education; and
- d. Tackle underrepresentation and provide all Camden young people with access to the opportunities available locally.
- ii. Good Work Camden which is a Council Investment of £5m over three years to transform the support available to people trying to find work in the Borough;
- iii. The Renewal Commission which is a new taskforce that is co-chaired by Camden Council and UCL Institute for Innovation and Public Purpose (IIPP). The fundamental principles driving change going forward is achieving growth via a sustainable and inclusive economy that works for all.
- iv. LB Camden is also securing and delivering its own programme of building new homes for residents, with a particular focus on delivering affordable housing.
- 1.34 The Proposed Development would deliver a substantial package of public benefits². The package of public benefits has been designed in collaboration with local communities to embrace and directly address LB Camden's initiatives and identified local needs. Through the public benefits package, the development would contribute to reducing inequalities and increasing life chances in neighbouring communities and the borough generally by maximising social value at the planning, construction and end user phases and also by supporting increased access to jobs, skills training and education opportunities. The package of public benefits has been subject to extensive discussions with LB Camden's Planning, Inclusive Economy and STEAM officers and has been devised following thorough consultation with the local community.

² The benefits have been drafted to ensure that they will have long-term impacts over a minimum of eight years.



- 1.35 Once operational, it is anticipated that the level of employment on site arising solely from the commercial element of the scheme would be 3,110 jobs³.
- 1.36 In addition, over a ten-year period following completion of the extension, the development is anticipated to increase local economic value by £2.4bn as well as increase local spending in LB Camden by £53m.
- 1.37 In line with the STEAM pledge the development would deliver the 'Somers Town Compact' (ST Compact). This SMBL initiative, unique to the Proposed Development, would provide a vehicle through which KQID businesses can connect with local people to collaborate on social, environmental and economic initiatives as well as with SME businesses who wish to benefit from the presence of KQ occupiers. The British Library will work alongside the ST Compact and tenants. The ST Compact, working with the local community and LB Camden's STEAM team, would deliver a programme of events, encourage tenants of the building to volunteer including going out to schools and connecting with the local community to deliver social value.
- 1.38 In summary, the proposed development would deliver the following substantial public benefits:

Environmental

- Aspiring to BREEAM 'Outstanding' with a minimum target of BREEAM 'Excellent';
- Improved permeability across the British Library Site and new connections to neighbourhoods in the British Library's immediately surrounding area;
- Provision of cycle and runner-commuter facilities to encourage sustainable /active travel
 options such as cycling and walking to reduce pollution from transport;
- Diversion of 95% of construction waste from landfill and would seek to retain waste at its highest level of utility, favouring re-use over recycling wherever feasible;

³ There is a range presented in the KQ uses statement, this number is however considered the likely number of jobs at the Site.



- Biodiverse roofs and planting at ground level to incorporate habitat and species that can thrive in the local environment and use the Site as a stepping stone to larger sites nearby;
- Deliveries and servicing to occur via Midland Road;
- Creation of three distinct externals zones an arrival zone for the Library and commercial uses off Midland Road, an enhanced public realm between the building and existing Dangoor Walk and a community garden and pedestrian entrance to the library off Ossulston Street;
- The public realm at ground level would incorporate permeable landscaping, contributing to the site-wide surface water drainage strategy, in line with the SUDS hierarchy;
- Delivery of CR2 infrastructure, mainly below ground optimising public realm on the west of the Site, to deliver significant improvements to LB Camden and London's public transport network in the longer term;
- Preserving the character and appearance of the Grade I listed British Library and enhancing its role in the lives of local people through increasing its size and reach;
- Preserving the character and appearance of the Kings Cross Conservation Area and providing beneficial effects on local views by delivering a building of townscape merit to a Central London location; and
- 39% reduction in carbon emissions against Building Regulations Part L.

<u>Social</u>

- Major extension to a nationally and internationally significant public institution (the British Library) (delivery funded by SMBL Developments Limited);
- Provision of approx. 10,000sq.m of new British Library Space to increase the Library's learning, exhibition, events and business facilities. These would be flexible and versatile spaces suitable for use by the community and able to host exhibitions, art shows and events etc;



- Increased permeability and accessibility of the British Library and associated facilities, including a new entrance from Ossulston Street and a publicly accessible ground floor to reinforce the knowledge ecosystem and create a democratic space accessible to all;
- Establishment of Community Advisory Groups (run by the British Library) whereby the community can be involved in the creation of collaborative projects and the long-term delivery of community-based services;
- The ST Compact (an SMBL initiative) would enable occupiers to access a ready made programme of initiatives based on the needs and requirements of the local communities, including education, training and employment as well as environmental and healthrelated projects. This would bring occupiers, the British Library, and other KQ organisations together to explore opportunities and engage in local projects;
- Continuation of the British Library's Community Engagement Team and engagement programme with the local community and local schools;
- Delivery of the British Library's 'Living Knowledge For Everyone' initiative;
- A Community Learning Garden would be delivered on the Ossulston Street side of the Site and would be co-curated, designed and managed by members of the local community;
- Commencement (September 2020) and continuation of the Community Gardener, coordinated by Global Generation (GG) and funded by SMBL. The scheme employs a local person whose role it is to help local residents to create their own gardens and amenity spaces and identify other greening projects the community might like to pursue; and
- SMBL together with DSDHA, would work with GG to map existing greening projects and work with residents to identify potential further greening projects in Somers Town. Funding is proposed to cover preliminary work to identify and prepare one or two concept schemes and progress schemes designs up to a position where they could implemented. These projects could be delivered during the construction period, if stakeholders agree that the locally focussed Community Infrastructure Levy (CIL) funding generated by the Proposed Development can be used to realise these projects. This could deliver long term positive benefits for the surrounding communities,



complementing the proposed on-site Community Learning Garden. SMBL sent a letter to stakeholders on 20 September 2021 requesting a discussion on this matter and will continue to seek engagement on this point.

 SMBL are also continuing to work with LB Camden officers to identify opportunities to facilitate the delivery of affordable housing in Somers Town.

Economic

- The development of CR2 infrastructure at the Site in an innovative way, to optimise the public amenity of the Site, delivering benefits to LB Camden and local residents;
- Approximately 170 jobs during the construction period first targeted at LB Camden residents via the Kings Cross Construction Skills Centre and others working alongside LB Camden's Economic Development team;
- An approximate increase in local net GVA by £2.4bn over a ten-year period after completion of the extension (as evidenced in the Knowledge Quarter Uses and Economic Value Statement, prepared by Arup);
- An approximate increase in local spending in Camden by £53m over a ten-years period after completion of the extension (as evidenced in the Economic Value and Knowledge Quarter Uses Statement, prepared by Arup);
- Provision of work placements and apprenticeships during the construction period and development of Employment and Skills Plan (construction and end user) with targets for apprenticeships, work experience placements and training opportunities. Final numbers would be determined in line with Camden Planning Guidance;
- Creation and access to a diverse range, and significant number of jobs within the completed development;
- Apprenticeships made available each year in the completed development within a range of roles;
- The British Library would continue its work with, and the Applicants would sign up to,
 STEAM pledges;



- Promotion of the Camden STEAM Commission objectives and other LB Camden initiatives
 such as Good Work Camden, amongst end users and occupiers;
- Requiring London Living Wage as a minimum salary for all employees;
- Provision of free wifi and study desks within the British Library Extension;
- Help for start-ups and micro businesses to grow and achieve success through the expansion of the Library Business and Intellectual Property Centre in the British Library Extension by:
 - targeting support for LB Camden's businesses and start-ups through the offer of
 (i) affordable workspace to SMEs and (ii) a robust business support network with support facilities, equipment and mentoring; and
 - maximising the opportunities for local businesses to supply goods and services at the construction and end user phases;
- Target local recruitment through Kings Cross Construction Support Centre (KXCSC), the Somers Town Job Hub and Good Work Camden;
- Maximising the opportunities for local businesses to supply goods and services at the construction and end user phases;
- Provision of affordable office workspace within the commercial space at a discounted market rate; and
- Encouraging occupiers of the building to enter into the ST Compact for a community outreach programme to provide education, services and support to the community and local schools. SMBL would support a programme of events to bring the local community, businesses, library and KQ occupiers together to explore opportunities and local projects.



2 Introduction

- 2.1 This Planning Statement has been prepared by Gerald Eve LLP on behalf of our Clients, The British Library Board and SMBL Developments Ltd ('the Applicants'), to support an application for planning permission and listed building consent in respect of their proposals at land to the north of the British Library ('the Site').
- 2.2 This Statement identifies national, strategic and local planning policy and guidance relevant to the application and assesses the degree to which the application accords with the statutory development plan. This Statement also identifies other material considerations relevant in determining the applications, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.3 The Statutory Development Plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004), and therefore the development plan against which development within the LB Camden must be assessed, comprises the London Plan, being the Spatial Development Strategy for Greater London, published by the Mayor in March 2021 and the Local Development Framework ('LDF')
- 2.4 The Local Development Framework ('LDF') for the Proposed Development comprises the Camden Local Plan (2017), the Local Plan Policies Map (updated March 2019), the Camden Site Allocations Plan (September 2013) and Neighbourhood Plans. The LDF is supported by a suite of Supplementary Planning Documents called Camden Planning Guidance ('CPG') documents, which are material considerations in the determination of planning applications.
- 2.5 This application seeks full planning permission and listed building consent for the following ('the Proposed Development'):

Full Planning Permission:

"Alterations to existing British Library building including demolition of the existing British Library Centre for Conservation and construction of a new building of up to 12 above-ground storeys and one basement level for use as library, galleries, learning, business and events spaces (Class F1) and retail and commercial spaces (Class E); provision of internal and external public spaces, landscaping and a community garden; improvement works



adjacent to Dangoor Walk; provision of cycle and car parking and servicing facilities; provision of Crossrail 2 infrastructure; means of access; and all associated works and infrastructure."

Listed Building Consent:

"External: Demolition of the pepper pot stair, circular brick enclosure and associated bridge connections at upper ground and first floor level to the north west of the British Library building, removal of: existing metal trellis balustrade at the edge of the external north terrace and potential storage for reuse or repair, adjustments to rear of external escape stair from first to external ground level north of Midland Road wing, existing external stair and associated balustrade to Ossulston Street and bracketed eaves to the north of the reading room near Ossulston Street. Infilling of existing square openings at level 1 in the brick core tower to the northern elevation of the building. Creation of new openings to both sides of the Terrace Restaurant glazing and new opening on the projecting brick tower at upper ground level. Resurfacing and new landscape to external terrace outside Terrace Restaurant. Removal of two sections of brickwork at lower ground floor level adjoining the loading bay.

Internal: Removal and relocation of artefacts and wall finishes from the north wall of the Philatelic Collection at upper ground level to new adjacent partition, removal and relocation of wall east of humanities reading room, including the relocation of the Panizzi bust, and relocation of wall finishes. Demolition of localised areas of internal back of house walls and partitions to enable connections through to the British Library Extension at upper ground level and level 1, and all other internal and external works associated with the extension of the British Library."

- 2.6 This application is being brought forward following detailed consultation with the LB Camden including planning, design, conservation, transport, inclusive economy and sustainability officers as well as statutory bodies such as Historic England (HE), the Greater London Authority (GLA) and Transport for London (TfL).
- 2.7 The application is a strategic application by virtue of parts 1B(b) and 1C(c) of the Town and Country Planning (Mayor of London) Order 2008 and is thus referable to the GLA.



- 2.8 The proposals, designed by RSHP, Arup and DSDHA, are summarised in Section 5 of this Statement as well as in the Design and Access Statement (DAS). This Statement should be read in conjunction with the following documents which have been submitted in support of this application for planning permission:
 - Planning Permission and Listed Building Consent Application forms, prepared by Gerald Eve LLP;
 - CIL Form, prepared by Gerald Eve LLP;
 - Site Location Plan, prepared by RSHP;
 - Cover Letter, prepared by Gerald Eve LLP;
 - Site Plan, prepared by RSHP;
 - Floor Area Schedule, prepared by Alinea;
 - Existing, Demolition and Proposed Plans, Roof Plans, Sections and Elevations, prepared by RSHP;
 - Existing and proposed Landscape plans and sections, prepared by DSDHA;
 - Planning Statement, including Draft Heads of Terms for Legal Agreement, prepared by Gerald Eve LLP;
 - Design and Access Statement, prepared by RSHP;
 - Energy Statement, prepared by Arup;
 - Heritage Impact Assessment, prepared by Cordula Zeidler;
 - Sustainability Statement, prepared by Arup;
 - Statement of Community Involvement, prepared by LCA;
 - Transport Assessment, prepared by Arup, including:
 - o Framework Travel Plan, prepared by Arup;
 - Car Parking Design and Management Plan, prepared by Arup;
 - o Draft Construction Management Plan, prepared by RMP;
 - o Delivery and Servicing Management Plan, prepared by Arup;
 - Basement Impact Assessment, prepared by Arup;
 - Economic Value and Knowledge Quarter Uses Statement, prepared by Arup;
 - Preliminary Ecological Assessment, prepared by Arup;
 - Public Realm and Landscape Design Statement, prepared by DSDHA;
 - Arboricultural Report, prepared by TMA;
 - Geotechnical Desk Study and Contamination Risk Assessment, prepared by Arup;



- Financial Viability Assessment, prepared by Gerald Eve LLP;
- Social Value Framework, prepared by Arup;
- Health Impact Assessment, prepared by Arup;
- Urban Greening Factor Assessment, prepared by Arup;
- Biodiversity Net Gain Assessment Report, prepared by Arup;
- Stage 2 Whole Life-Cycle Carbon Assessment, including a Demolition Justification Report, prepared by Arup;
- Circular Economy Statement, prepared by Arup;
- BREEAM Ecology Assessment, prepared by Arup;
- Fire Statement, prepared by Arup;
- Flood Risk Assessment, prepared by Arup;
- Townscape, Visual and Built Heritage (off-site) Assessment, prepared by Tavernor Consultancy;
- Daylight Sunlight Non-Technical Summary, prepared by GIA; and
- Environmental Statement, prepared by Arup; including:
 - Archaeology, prepared by Arup (ES chapter);
 - Air Quality, prepared by Arup (ES chapter);
 - o Built Heritage on-site, prepared by Cordula Zeidler;
 - Climate Change, prepared by Arup (ES chapter);
 - Daylight, Sunlight, Overshadowing, Solar Glare and Light Obtrusion
 Assessment, prepared by GIA (ES chapter);
 - Electronic Interference, prepared by Arup (ES chapter);
 - Socio-Economics, prepared by Arup (ES chapter);
 - Environmental Wind, prepared by Arup (ES chapter); and
 - Noise and Vibration, prepared by Arup (ES chapter).
- 2.9 The application has been assessed in relation to relevant planning policy, guidance and the statutory tests with which, for the reasons set out within this Statement, the proposed development complies, when considered as a whole, whilst also delivering significant public benefits. The application should therefore be granted full planning permission and listed building consent accordingly.



The British Library

- 2.10 The British Library is the national library of the UK. Established by an Act of Parliament in 1972, the scope of its remit, the scale of its operations, the range of its services and the international importance of its collections are without equal. The collection which consists of some 170 million items is unconstrained by subject, geography, format or language.
- 2.11 In recent years, a key focus for the British Library has been the Living Knowledge and 'Living Knowledge For Everyone' Agenda, informed by the Library's Living Knowledge Mission 2015-23. In light of the Covid-19 pandemic, the agenda acknowledges the anticipation of transformative shifts in the way knowledge is created, shared and harnessed for innovation and recognises the unique role the Library plays in a time of transformation. The Mission therefore focuses on the Library's commitment to rebuilding its own spaces and services to adapt to these shifts through both social and cultural renewal and economic growth and innovation.
- 2.12 The Library aims to deliver tangible public value through six key purposes:
 - A custodian to the UK's national collection of published, written and digital content;
 - ii. Supporting and stimulating research;
 - iii. Helping businesses to innovate and grow;
 - iv. Engaging community with cultural experiences;
 - v. Inspiring young people and learners of all ages; and
 - vi. Working with international partners to advance knowledge and understanding.
- 2.13 During the Covid-19 pandemic and what follows, social cohesion generated by The British Library's partner institutions in the library, heritage, culture, arts and research sectors will be needed more than ever. Between now and 2023, the Library is committed to accelerating its work to create a library for everyone, working to strengthen the supporting infrastructure it provides to these vital networks.
- 2.14 The British Library's 'Living Knowledge For Everyone' initiative seeks to raise awareness of the Library as a place for everyone who may wish to use the facilities and benefit from the



programmes and collections at the British Library. The initiative also seeks to respond to the changing nature of the British Library's audience in the 21st century.

- 2.15 The extension of the British Library has Governmental support. On the announcement of the joint venture partnership between the British Library and Stanhope and Mitsui (2017), the then Secretary of State for Culture, Media and Sport said: "The British Library is one of our finest cultural institutions, housing an unparalleled collection of knowledge. This innovative project will increase access to the Library's first-class collections, providing new exhibition spaces, learning opportunities and facilities for visitors from Britain and around the world to enjoy. It is a significant commitment to digital research and data science, and I am pleased the expansion will provide a bespoke headquarters for the Alan Turing Institute" (London Evening Standard, 12 April 2017).
- At London level, the Deputy Mayor for Business at the GLA said: "This is another exciting development for London's flourishing Knowledge Quarter, our world-leading life sciences sector and our rapidly growing reputation for data science. It is a huge vote of confidence in the capital post-Brexit. London is one of the greatest scientific cities on the planet. We are internationally renowned as a bastion of research and innovation and one of the most attractive places in the world for life and data science companies to do business. This new investment, just a stone's throw from the Francis Crick Institute is another huge boost to London's role as a global capital of science and innovation. As well as leading to world-changing discoveries, products and services it will deliver new jobs and demonstrate that London is Open to the world's greatest scientific minds" (Architects' Journal, 11 April 2017).

The Knowledge Quarter

- 2.17 The Knowledge Quarter (KQ) Partnership is based in the British Library itself and was established in December 2014 to recognise and develop LB Camden's strength as a thriving knowledge economy with world-class institutions in science and creative industries. The KQ is a consortium of partner organisations of many different kinds but all actively engaged in disseminating knowledge. It is formed of over 100 academic, cultural, research and scientific and media organisations and its vision is described as 'transforming lives through innovation.'
- 2.18 The KQ identifies its four strategic priorities as follows and the proposals for the extension of the British Library have been developed with these values at its core:



- Advocacy the knowledge quarter will increase the area's profile through advocacy and stakeholder engagement, both nationally and internationally.
- Knowledge exchange The Knowledge Quarter will facilitate knowledge exchange and identify opportunities for openness, collaboration and networking between its members.
- People The Knowledge Quarter will work with its members to increase public access to their knowledge resources and collections, creating opportunities for exchange with local citizens.
- Place The Knowledge Quarter will work with its members to identify and support work that improves the local environment, creating a great place for people to live work and visit.
- 2.19 LB Camden has a thriving knowledge economy with world-class academic, cultural, research, scientific and media institutions and organisations. In recent years these institutions and organisations have started to cluster in the area surrounding King's Cross, St Pancras and Euston Stations and the area has seen tremendous growth owing to the excellent transportation links, highly skilled workforce high-quality office and laboratory floorspace and the enhanced retail, art and leisure offer. Today, the KQ can be considered London's most mature knowledge cluster.
- 2.20 This application seeks to deliver a building containing floors enabled to accommodate laboratory floorspace suitable for use by occupiers that would support and contribute to the growth and success of the KQ as a world-class cluster of science and knowledge-based institutions.

Science and Innovation Audit

- 2.21 The Science and Innovation Audit Report (2018), sponsored by the Department for Business, Energy and Industrial Strategy highlights the KQ's role as arguably the densest concentration of scientific and knowledge-based organisations anywhere in the world, creating an 'incubator for the UK'.
- 2.22 The report identified aspects that drive the success of the KQ and confirmed the area's reputation as an international player in the following areas: i) Life sciences: Emerging infectious diseases, including antimicrobial resistance; musculoskeletal pathology associated with ageing; dementia; ii) Cultural, scientific and heritage collections: Digital archiving,



curation and publishing; and iii) Data sciences: Machine learning, a form of artificial intelligence.

- 2.23 The report also highlighted the 'gaps' in the innovation ecosystem, all of which are space related, as follows:
 - i. Low availability and high cost of appropriate commercial sites and premises.
 - A dearth of innovation space, especially wet-laboratory space for Life Science start-ups and small businesses.
 - iii. A lack of suitable move on space for companies wishing to expand operations/take on more staff.
 - iv. A lack of business accelerators for start-ups and other small firms.
- 2.24 The audit specifically refers to the exciting opportunity for the British Library Extension scheme to address the 'grand challenges' identified in the audit, namely: i) ageing society; and ii) Al and the data economy.
- 2.25 The report highlights the importance and sensitivities of the relationship of the existing residential communities within the KQ and the need for these local communities to benefit fully and equitably from long term growth.
- 2.26 The report recommended the preparation of a Knowledge Quarter Spatial Strategy (2050).
 LB Camden's Knowledge Quarter Spatial Strategy is now being progressed.
- 2.27 The spatial strategy will be a high-level framework within which infrastructure investment is prioritised and funded. It will also set out the social missions necessary to deliver genuinely inclusive growth for LB Camden residents and the role of industry, investors and institutions in meeting the challenge. The main themes and opportunities are: inclusive economy (Good Work Camden), environment/sustainability (delivering the Camden Climate Change Action Plan), development (start up and move on space), place including public realm and movement (improving movement across the quarter including barriers such as Euston Road).
- 2.28 Support for the knowledge economy, including the life sciences sector, is clear at all political levels. The Secretary of State for Health stated in 2021: "It's no longer about getting us back to where we were it's about charting a new and better course, where we learn the lessons



of the pandemic, and build back better, to transform the UK into a life sciences superpower.'

2.29 The Mayor of London, Sadiq Khan, has also expressed clear support for the life sciences sector in London, stating "London remains one of the most attractive places for life science companies to do business in the world and our great city will continue to lead the way in medical research and innovation... I am absolutely determined that this will continue, and that we not only retain the world's best scientists but continue to attract them to our world-leading cluster of medical research institutions" (2016).

Crossrail 2

- 2.30 The Site is safeguarded for the delivery of CR2 infrastructure.
- 2.31 CR2 will provide capacity for an additional 270,000 people to travel into and across Central London each rush hour and help to reduce crowding elsewhere on the network, as well as unlocking around 200,000 new homes and supporting up to 200,000 new jobs (London Plan, paragraph 10.3.8). In addition, the latest economic studies for Crossrail 2 by PWC indicates that for every £1 invested in infrastructure that supports CR 2, £1.80 in direct public benefit can be expected, rising to around £2.00 when wider benefits are included in the calculation⁴.
- 2.32 CR2 will serve stations throughout the Southeast, linking southwest and north east London, as well as destinations across Surrey and Hertfordshire. It will create better connections across the Southeast and the whole country, with a new Euston / St Pancras station providing direct access to the new High Speed 2 line, Thameslink and Eurostar services.
- 2.33 The design of the CR2 infrastructure at the Site has been done in an innovative way, to optimise the public amenity of the Site, delivering benefits to LB Camden and local residents. The Applicants have undertaken a complex design and engineering exercise with TfL that has resulted in placing the large extract fans required for ventilation horizontally at basement level. This work has enabled the delivery of significant public realm at the western end of the Site adjoining Ossulston Street.

⁴ Taken from page 37 of the Economic Value and Knowledge Quarter Uses Statement, prepared by Arup.



3 Site and Surrounding Area

The Site

- 3.1 This Section describes the Site's location and context in greater detail. The extent of the application Site is shown on the Site Plan submitted in respect of the application for Planning Permission and Listed Building Consent and covers an area of 16,660 sqm. The site area for the original Project Brief was 2.8 acres.
- 3.2 The Site is located to the north of the British Library and is bounded by Midland Road (east), the British Library building (south), Ossulston Street (west) and Dangoor Walk (north). The Site is within the LB Camden, and the ward of St Pancras and Somers Town. The application Site incorporates parts of the existing British Library building. The British Library building itself, as well as the piazza and boundary wall and railings to Ossulston Street, Euston Road and Midland Road are Grade I listed. Certain areas of the British Library are excluded from the listing (see Appendix B). Whilst the Site is not located within a conservation area, the King's Cross St Pancras Conservation Area is close by to the east.
- 3.3 The Site includes the British Library Centre for Conservation (BLCC), located on Midland Road as well as the Story Garden, a meanwhile use located within the western portion of the Site, access to and part of the existing British Library loading bay, as well as an underground tankfarm.
- 3.4 The BLCC is a three-storey reinforced concrete framed building comprising of an upper and lower ground floor level, a first-floor level and a roof level, which was designed and built between 2003-2007. Whilst the BLCC is connected to the British Library in function and physicality, the building is explicitly excluded from the listing.
- 3.5 The Story Garden, located within the western portion of the Site, is a temporary community garden which was brought forward by the British Library and SMBL Developments Limited and leased to GG. It also accommodates the Central Saint Martins 'Make Space'.
- 3.6 The existing loading bay used by the British Library also falls within the application Site boundary. The loading bay must remain operational throughout the development process to



ensure continuity for the British Library. The existing short stay cycle parking and under-croft is also included within the Application Site.

- 3.7 The Site is located in the Central Activities Zone; the vibrant heart and globally-iconic core of London described in the London Plan as 'one of the world's most attractive and competitive business locations.' Additionally, the Site is located within LB Camden's Central London Area described in policy terms at a local level as a major business and employment centre and the main focus of LB Camden's economy. A minor part of the Site (the existing cycle parking under-croft falls) under designated view 6A.1 of the London View Management Framework (LVMF)(2012), which crosses the Site at its south-western corner.
- 3.8 The Site is within the Knowledge Quarter Innovation District⁵ (KQID). The KQID is centred on the British Library and Kings Cross/St. Pancras at its centre and spans from Camden Town to Holborn and Covent Garden. It is home to a world-class cluster of scientific and knowledge-based institutions and companies that specialise in areas such as life-sciences, data and technology and creative industries. In recent years, such institutions have started to cluster around the area surrounding King's Cross station owing to the excellent transportation links, a highly skilled workforce and the high-quality office and laboratory space in the vicinity.
- 3.9 The Site is served by St Pancras International Station, King's Cross Station and King's Cross Underground Station and by an established pedestrian network of walking, cycling and bus routes.
- 3.10 King's Cross Underground Station is served by the Northern line, Victoria line, Piccadilly line, Hammersmith and City line, Circle line and the Metropolitan line, making it the most connected station in the Capital. King's Cross Station provides access to rail services connecting London with Cambridge, the north-east of England, the Midlands and Scotland. St Pancras International Station provides services to national and international locations inclusive of Nottingham, Margate, Brighton, Bedford and international destinations such as Paris and Brussels.

⁵ As defined in Figure 3.1 of Camden's draft Site Allocations Plan, Chapter 3 'Knowledge Quarter'.



- 3.11 The Site is well served by bus services, with several routes within 640m walking distance of the Site, including St Pancras International, the British Library, King's Cross Station York Way, Euston Road and Euston Bus Station.
- 3.12 The Site has as a PTAL rating of 6b which indicates an 'excellent' connectivity to the surrounding network, and the highest possible score on the PTAL scale.

Surrounding Area

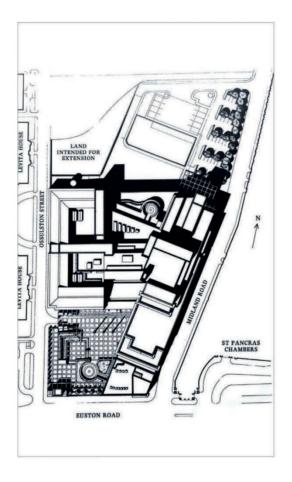
- 3.13 The land surrounding the Site contains a range of uses. Midland Road bounds the Site to the east and is dominated by King's Cross and St Pancras Stations as well as the new King's Cross Central masterplan, Dangoor Walk bounds the Site to the north, running directly to the south of the Francis Crick Institute (FCI). Also to the north are: the FCI, Europe's largest biomedical research centre, and Central Somers Town (including Brill Place), a major LB Camden-led residential development that received planning permission in 2016. Ossulston Street bounds the Site to the west and connects the Site to Somers Town, a residential neighbourhood with historic and cultural ties that date back to the eighteenth century. Levita House (Grade II statutory listed) is a residential building and sits directly opposite the Site on the western side of Ossulston Street. Immediately to the south is Euston Road, a busy section of the A501 that stretches east to west between Old Street and Edgware Road. Euston Road typically has high street type uses (shops/banks/cafes) at ground floor with offices and hotel accommodation to the rear and above. The Site is also surrounded by a network of streets connecting Euston through to Somers Town and Kings Cross and St Pancras stations.
- 3.14 There are several heritage assets nearby the Site, including several Grade I buildings including the British Library, King's Cross Station, St Pancras Station and the former Midland Grand Hotel. Several Grade II buildings also surround the Site, including Great Northern Hotel, Camden Town Hall, Levita House and Chamberlain House.



4 Planning History

- 4.1 This section outlines the Site's recent planning history. Over the years the Site has been subject to various applications for planning permission and listed building consent. A full planning history has been included at Appendix A of this Statement.
- 4.2 Outline planning permission was granted in April 1978 to develop the 200,000 sqm British Library building, which was designed to house desks for 3,500 readers and space for 2,500 staff and up to 25 million volumes. The intention was to develop the full plot of land in three phases, however due to difficulties with funding, only a version of reduced scale for Phase 1, which represented around 60% of the whole project, was subsequently completed. The plan below illustrates the intention, despite the reduction caused by funding, to develop the whole plot in the future, with the land to the north of the British Library clearly annotated as 'land intended for extension'.

Image 1 -British Library Intention for Extension. Note over The Site states 'Land intended for extension'





- 4.3 Since the completion of the British Library building there have been several applications for planning permission and, following the Library's Grade I listing in 2015, several listed building consent applications at the Site. The salient applications are summarised below.
- 4.4 Planning permission was granted on 14 February 2005 under application ref. 2005/0214/P for the "Erection of a three story library conservation centre; the formation of a first floor terrace over existing loading bay yard; and associated works, including alterations to external works and car park layout."
- 4.5 An application for listed building consent was granted on 11 July 2016 under application ref. 2017/2294/L for "Works of refurbishment and alteration for the St. Pancras Transformed project comprising the creation of a new British Library Members' and Friends' Rooms, upgrade of bar and foyer space in the Conference Centre, and associated works."
- 4.6 On 14 March 2019, listed building consent was granted at the Site (ref. 2018/6137/L) for "Internal works to the Paccar Gallery, comprising the formation of a new opening into the exhibition workshops, installation of new partitions, alteration of ceiling grid and installation of new lighting track system."
- 4.7 Planning permission was granted on 7 August 2019 under application ref. 2019/3432/P for the "Erection of temporary structures in connection with the temporary use of educational community garden (Class D1) for a period of 3 years (amendment to approved planning permission reference 2018/5663/P, dated 09/01/2019, namely to include additional/altered facilities)."
- 4.8 Applications for full planning permission (ref. 2019/3835/P) and listed building consent (ref. 2019/3835/L) were approved at the Site on 15 October 2019 for "Improved inclusive access works from the Piazza to Main Entrance of the British Library; including new ramp, steps, handrails, balustrades and terraces."
- 4.9 The Site has also been subject to a number of smaller applications relating to minor internal and external works, as well as the display of signage, screens and lighting. These applications are outlined within the full planning history table included at Appendix A of this Statement.



Certificate of Immunity from Listing

- 4.10 Most recently, a certificate of immunity from listing (COIL) for the BLCC was applied for in October 2020. The report from the DCMS, dated 22 February 2021, states that "although a successful contextual addition to one of the most significant post-war buildings in the country, the BLCC's restrained external form and its functional internal planning are not of intrinsic special interest, particularly when considered against the strict criteria for listing buildings of such recent construction". The report also states that "as a technical facility built as part of a distinct, later phase of the British Library's Site development, the BLCC has limited claims to historic interest associated with the Library's status as a major national institution."
- 4.11 The COIL was approved on 5 October 2021.

Other relevant applications within the British Library Site

- 4.12 Although not within the application red line, the following application within the British Library Estate is considered relevant context to the proposed development.
- 4.13 Listed building consent was granted on 5 July 2016 (ref. 2016.1234/L) for "Internal refurbishment of the 1st floor office space and associated works to house the Alan Turing Institute."

Surrounding Area

- 4.14 The area surrounding the Site continues to be subject to significant investment and change, especially as a result of the developments at King's Cross and the Francis Crick Institute and the area's recognition as the Knowledge Quarter. The following recent major planning permissions granted in the area exemplify the extent and breadth of change and investment in the area since the turn of the century.
- 4.15 In December 2006 outline planning permission was granted for the redevelopment of King's Cross Central (ref. 2004/2307/P) for a comprehensive phased, mixed-use development of the former railway lands. The permission comprised business, employment, residential, retail, community, health, education, cultural and leisure uses. Since that time, several reserved matters applications pursuant to the outline planning permission have been approved and bought forward.



- 4.16 In March 2011 planning permission was granted for the development of the Francis Crick Institute, located to the rear of the British Library, to provide a biomedical research centre including laboratory and research space, lecturing and teaching space, exhibition space and a community facility (ref. 2010/4721/P). Land within the Application Site red line was subject to a S.106 agreement associated with the planning permission approved under application ref: 2010/4721/P (dated 10 March 2011). Discussions on managing that land are ongoing between the relevant parties outside the planning process.
- 4.17 Brill Place Tower (ref. 2015/2704/P) also gained planning permission in December 2015 as part of the wider Somers Town CIP proposals for the provision of mixed-use development, including a replacement school, new community facilities, flexible retail and community uses and 136 residential units spanning over 7 buildings.
- 4.18 August 2017 marked the approval of a reserved matters application at 6 Pancras Square for the erection of a 7-11 storey building for use as offices (ref. 2017/3133/P). Upon completion of the development the space has been secured to house Google's HQ.
- 4.19 Belgrove House, which lies to the southeast of the British Library, received planning permission in November 2021 for the redevelopment of the site, as a part 5-part 10 storey building plus 2 basement levels which is proposed to house MSD's Global Discovery Centre and HQ (ref. 2020/3881/P).
- 4.20 On 30 June 2021 LB Camden's planning committee resolved to approve a development at St Pancras Hospital for the partial redevelopment of the site, involving the demolition of seven existing buildings and construction of a part seven, part ten storey purpose-built eyecare, medical research and educational centre for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity (ref. 2020/4825/P).
- 4.21 Most recently, on 8 July 2021, LB Camden's planning committee resolved to grant planning permission for the redevelopment of the former Royal National Throat, Nose and Ear Hospital site. The development comprises the retention of 330 Gray's Inn Road and a two-storey extension above for use as hotel, as well as the demolition of all other buildings to make way for a part 13, part 9 storey building for use as a hotel, a 7-storey building for use as office, a 10 storey building for use as residential and a 5 storey building also for use as residential (ref. 2020/5593/P).



5 Development Proposals

A full description of the proposed development is provided in the Design and Access Statement, prepared by RSHP, Arup and DSDHA. The key points are summarised in this section. This application seeks full planning permission and associated listed building consent for the following development proposals:

"Alterations to existing British Library building including demolition of the existing British Library Centre for Conservation and construction of a new building of up to 12 above-ground storeys and one basement level for use as library, galleries, learning, business and events spaces (Class F1) and retail and commercial spaces (Class E); provision of internal and external public spaces, landscaping and a community garden; improvement works adjacent to Dangoor Walk; provision of cycle and car parking and servicing facilities; provision of Crossrail 2 infrastructure; means of access; and all associated works and infrastructure."

Need for Development

- 5.2 In recent years the British Library has acknowledged the anticipation of transformative shifts in the way knowledge is created, shared and harnessed for innovation, and recognises the unique role that it plays at a time of transformation. The Library is therefore committed to rebuilding and expanding its own spaces and services to adapt to these shifts, in order to fulfil its purpose as a national library in the 21st Century.
- 5.3 However, parts of the existing site are currently vacant or underused, except for the Story Garden and the British Library Conservation Centre (BLCC). Whilst the BLCC offers an interesting addition to the Library, it has created problems with respect to the effective use of peripheral areas of land that are necessary for the long term health and flexibility of this national institution.
- 5.4 This under-utilised land, including the Story Garden and BLCC, has therefore been identified by both the Library and LB Camden as land appropriate for an extension to the existing Library. In 2015, SMBL Developments Limited were subsequently brought onboard to bring forward this development intention, alongside the British Library.
- 5.5 The proposals on this Site have been developed to deliver on three strategic priorities for LB Camden, London and the UK: an extension to the British Library, facilitating the delivery of CR2



infrastructure, and the provision of a significant quantum of commercial, including lab-enabled, floorspace suitable for KQ occupiers.

- 5.6 The proposals are bought forward against the context of the KQ to deliver an exemplar building which will lead the way for sustainable development in the future. The Proposed Development would create a major extension to a national institution which would be publicly accessible. In addition, the proposed commercial space, including lab-enabled floors which would be suitable for use by KQ occupiers, including life science organisations.
- 5.7 The proposals reflect the aspirations of both adopted planning policy and guidance and the emerging policy context of LB Camden's Site Allocations Document (2019) which is currently being consulted on both in respect of the Site itself and the wider KQ vision.
- 5.8 The proposed development delivers a substantial package of public benefits designed specifically to embrace and address the Camden 2025 Vision and initiatives and result in a development which contributes to reducing inequalities and increasing life chances in neighbouring communities and the borough generally, by maximising social value at the planning, construction and end user phases, and by supporting increased access to jobs, skills, training and education opportunities.
- 5.9 The application proposals have evolved in response to discussion and feedback from officers at LB Camden, the GLA, Historic England, CR2/TfL and extensive consultation with local groups, stakeholders and residents. This is set out in further detail in Section 6 of this Statement and within the Statement of Community Involvement ('SCI') that has been prepared by London Communications Agency and submitted with this application.
- 5.10 The existing Site is underused, vacant and not accessible to the public, except while the Story Garden is in meanwhile use. The BLCC, built in 2007, was expressly excluded from the Historic England listing description for the original British Library building (2015). The BLCC is not locally listed but, according to the Heritage Impact Assessment, prepared by Cordula Zeidler Heritage Consultancy, has some interest as a sympathetic addition to the Grade I listed Library.
- 5.11 The surrounding public realm is of a poor quality. Dangoor Walk, whilst providing an east west route to the south of the Francis Crick Institute, is currently unwelcoming due to the blank south ground floor of the institute and there is very little external public realm or open space near the Site for residents to enjoy. The Site itself is inaccessible to the public, except for the Story



Garden, offering no connections through the area. This Site therefore presents a significant opportunity to deliver substantial improvements to the public realm at the Site and also create legible linkages through the Site to wider area and between Euston, St Pancras and King's Cross Stations.

- In recent years, King's Cross station and the area surrounding it has been transformed by the redevelopment of the King's Cross Central masterplan including the Boulevard and Pancras Square, Granary Square, Coal Drops Yard and the public realm in the vicinity. In addition, the Francis Crick Institute has been developed to the north of the Site. Such developments have already acted as a catalyst for change in the area. The proposed redevelopment of the land to the north of the British Library seeks to further contribute to improving the area with high quality architecture, significantly increased and improved public realm and the transformation of the area surrounding King's Cross towards Euston. This would improve the relationship between the two major railway stations both in terms of design character and appearance and pedestrian experience.
- 5.13 The massing of buildings surrounding the Site steps up from south to north along Midland Road. The neighbouring Francis Crick Institute and more recently the Brill Place Tower permission, set in the context of the major railway infrastructure, indicate that buildings of a larger mass can be appropriately delivered in this location.
- 5.14 The Proposed Development would lead to the following floor areas:

Land Use	Existing (sqm GIA)	Proposed (sqm GIA)	Uplift (+/-)
Library (Class F1)	8,105	15,015	+ 6,910
Commercial (Class E) including ATI space (previously known as B1a/B1b)	0	77,046	+ 77,046
Commercial (Retail) (Class E)	0	558	+ 558
CR2 (sui generis)	0	7,739	+ 7,739
Total	8,105	100,358	+ 92,253



Table 1: Existing and Proposed Land Use Areas, provided by Alinea Consulting

5.15 The proposals lead to a total floorspace uplift of 92,253 sqm (GIA) meaning the scheme is Community Infrastructure Levy (CIL) liable.

British Library Space

- 5.16 In respect of public facing activities, the British Library has outgrown its existing building. To serve the needs and demands of its existing and prospective users, fulfil its mission statement (see para 1.5) and achieve its ambition for the "Living Knowledge For Everyone" strategy, the Library requires a significant increase in floorspace. The application Site has been earmarked for redevelopment as an extension to the British Library since the completion of the existing building. It is therefore entirely appropriate to expand the British Library building and to do so in this location.
- 5.17 The proposed building would house expanded, relocated and new British Library spaces including: exhibition, gallery, learning, business and events facilities and substantial areas of circulation including a large east-west foyer space. The existing BLCC would be relocated and rehoused. The British Library's successful Business and Intellectual Property Centre (BIPC) would also be expanded into the proposed extension as would the Learning Centre, with the provision of youth learning for 16–25 year-olds. Affordable workspace would also be provided within the BIPC. The Library spaces have been designed by RSHP in close consultation with the British Library and respond directly to their requirements and those of their existing and prospective users (garnered via a thorough consultation exercise).
- 5.18 The spaces would deliver world-leading Library and civic facilities at the UK's national Library of which the country, and especially LB Camden residents, can be proud of and enjoy.

British Library Foyer

5.19 The Proposed Development would unlock the opportunity to create a democratic, civic space at the heart of the KQ in the form of the 'foyer' space at ground floor level. The foyer would form part of the British Library floorspace within the Proposed Development, and would deliver significant internal public space, accessible to all. The opening hours for the BL Foyer are to be agreed in the future but has been designed to enable it to be open independently of the wider BL complex. The British Library Foyer would have two equally treated main access points from



Ossulston Street and Midland Road and would also be accessible from the north from the new external public realm running east-west to the south of Dangoor Walk. There would be a programme of events throughout the year which would be accessible to local residents and businesses alike. The Applicants would also work with local residents and businesses to cocurate exhibitions and events within the space.

5.20 Throughout the pre-application process the submitted design of the British Library Foyer has responded directly to comments received from the local community and LB Camden.

Provision of Commercial, including Lab-Enabled, Floorspace

- 5.21 The Proposed Development would deliver a significant quantum of exceptional, high-quality commercial, including lab-enabled, floorspace (77,046 sqm) to the heart of the KQ, and a new space for the Alan Turing Institute (ATI) headquarters.
- 5.22 RSHP have designed levels 2-7 of the south wing of the Proposed Development to be lab-enabled to suit a diverse range of occupiers, seeking to locate at the heart of the KQ. The designs of the internal floorplates have been led by sustainability principles and the requirements of commercial occupiers in KQ industries. They are flexible and can be occupied by a large single tenant or by multiple tenants across all floors. External amenity terraces are proposed at levels 2 and 8 for use by the commercial occupiers.
- 5.23 Affordable workspace would be provided by the British Library within the BIPC. How affordable workspace is best delivered within the commercial space is subject to ongoing discussions with LB Camden officers.
- 5.24 In terms of sustainability principles, the building has been designed to be a leading example and has been guided by the United Nations Sustainable Development goals. The development is aspiring to BREEAM 'Outstanding', with a rating of 'Excellent' targeted as a minimum.
- 5.25 The commercial entrance lobby is directly accessed from Midland Road and this leads up to the commercial reception located at the upper ground floor. The remainder of commercial uses at ground floor comprise the retail 'cells' which would be accessible from the British Library foyer and the public space.



5.26 The access to the long-stay cycle parking (including shower and locker) facilities is located on the Ossulston Street side of the Site within the public realm, via a ramp leading to the basement.

Public Realm

- 5.27 The Proposed Development would create a substantial quantum of new high-quality public realm at the Site. The proposed external open space represents an uplift of 1,970 sqm on the existing provision across the Site.
- 5.28 The proposed landscaping layout to the Ossulston Street end of the Site has been subject to extensive consultation with the local community and LB Camden planning and design officers. During the pre-application process, this led to the entire northern wing of the proposed extension being reduced in length and shifted to the east, creating additional public realm which is proposed to become a Community Learning Garden which the local community would be encouraged to participate in both designing and managing. The shift also enabled the creation of a civic entranceway on the Ossulston Street elevation, ensuring that the entrances on Midland Road and Ossulston Street are viewed equally, a key design objective of the scheme and for LB Camden and local residents.
- 5.29 The landscaping on the Midland Road entrance creates a civic entranceway from St Pancras railway station and in front of the FCI. This would contribute to the affirmation of the Library being at the true heart of the KQ, with the confluence of three key KQ institutions (the FCI, ATI and the British Library).
- 5.30 The existing Level 1 courtyard which is publicly accessible would be extended by 430 sqm in the proposals. The courtyard would be framed by the new south-north connecting route through the British Library estate which, is currently a cul-de-sac with no public access from the north area of the Site. This space would also increase the permeability of the Site internally east-west.

Retail

5.31 The commercial retail use proposed to the 'cells' running along the ground floor north elevation of the Site would be occupied for retail uses such as cafes, shops and restaurants. The retail floorspace would serve the demand created by the commercial, Library and public user groups generated by the Proposed Development and would activate and animate this elevation of the building.



5.32 The proposed retail cells to the south of Dangoor Walk would help to draw people into the development from the new area of external public realm, with access between the units into the BL foyer. Space may be designated within the foyer for tables and chairs related to the retail cells. This would add to the creation of an active atmosphere and one in which people can dwell within the internal foyer space.

Crossrail 2 infrastructure

- 5.33 The required CR2 infrastructure, including ventilation shafts, has been innovatively designed following detailed consultation with CR2 Officers. The innovative design has avoided ventilation shafts being located above ground in the public realm which would severely harm the quality of any public realm at and immediately around the Site.
- 5.34 The delivery of CR2 infrastructure would meet national, regional and local needs for improved transport connections.



6 Pre-Application Consultation

6.1 In respect of pre-application engagement, paragraph 39 of the NPPF confirms that "early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community."

Policy Context

- 6.2 LB Camden adopted a Statement of Community Involvement ('SCI') in 2006 and this was last revised in 2011. The SCI sets out how LB Camden will involve local people, local businesses and other key organisations and stakeholders when they prepare planning policies and consider planning applications.
- 6.3 Paragraph 39-46 of the NPPF highlights the important of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.

Consultation Strategy

- A Statement of Community Involvement prepared by LCA has been submitted with this application.
- 6.5 Following the announcement of SMBL Developments Ltd as the preferred partner for delivering the project, introductory meetings with members of the local community were held. The purpose of these meetings was to introduce the team and the design concepts for the project and follow up on the earlier discussions hosted by the British Library.
- 6.6 Following the introductory meetings, the British Library and SMBL Developments Ltd entered into a Development Agreement and began to develop emerging design concepts ahead of launching the pre-application consultation for the project in October 2020.
- 6.7 The Applicants subsequently conducted a thorough consultation programme adapted to account for the fact that most in-person engagement was at the outset discouraged by



Government advice (and subsequently prohibited due to the Covid-19 pandemic), which was shared with LB Camden in advance to ensure an appropriate approach was taken during the uncertain times created by the pandemic. Once restrictions began to lift in July 2021, the Applicants undertook further face-to-face engagement ahead of the submission of an application. The main activities broken down are as follows:

- **Phase 1** (2015/16) Initial engagement on the concept by the British Library;
- Phase 2 (2017-2020) Re-engagement following the announcement of SMBL as the preferred partner for the project and consultation on the early concept for the proposals;
- **Phase 3** (October 2020 January 2021) Pre-application consultation with engagement work on emerging proposals;
- Phase 4 (February May 2021) Engagement on developing designs; and
- **Phase 5** (late May-August 2021) Engagement on detailed designs.

LB Camden Pre-Application Meetings

- 6.8 The development proposals have been subject to extensive pre-application consultation with LB Camden planning, design, highways, security, access, waste and sustainability officers.
- 6.9 A pre-application meeting schedule has been included at Appendix C.
- 6.10 Feedback received at the meetings has been taken on board within the application proposals.

Strategic Panel

- 6.11 The proposals were presented to LB Camden's Strategic Panel on 9 November 2020.
- 6.12 Feedback was positive, with panel members describing the scheme as an exciting, long-term project on a large scale, with the potential for wide ranging benefits and outcomes. As such, panel members expected the scheme to be ambitious, creative and collaborative.
- 6.13 It was noted that the Site's prominent location between the residential communities of Somers Town and the busy stations and extensive commercial development at King's Cross and St Pancras, meant that the Site has a key role to play in breaking down some of the



barriers between these communities and engaging with residents to provide opportunities that should be available to them in their neighbourhood, including employment opportunities.

- 6.14 The Panel acknowledged the benefits of the British Library's aspiration to secure an independent income stream and were supportive of the regional and national benefits to public transport connectivity and capacity from the CR2 project. However, the Panel made clear that these wider outcomes should not be delivered at the cost of making improvements to local lives. Members also stated the expectation to deliver a contribution to housing and affordable housing in the local area.
- The British Library's commitment to providing accessible community spaces was welcomed. The Panel stressed the importance of the proposals in adding to the variety of types of welcoming public open space and green spaces for communities in the wider area, as well as the need for local communities to have opportunities to contribute to and influence the public spaces during the evolution of the proposals. Maintaining the Story Garden as a public resource and maximising the use of outdoor space across the Site were also encouraged.

Webinars

- 6.16 Five online webinars were held throughout November and December 2020. Approximately 45 stakeholders attended. Each webinar had a different focus, as outlined below:
 - Webinar 1 12th November introduction to the proposals;
 - Webinar 2 19th November urban context and open spaces;
 - Webinar 3 25th November culture, education and learning; and
 - Webinars 4 & 5 10th & 16th December reflecting on consultation so far.
- 6.17 A summary of the areas of discussion from the webinars is included at section 5 of the Statement of Community Involvement, prepared by LCA.

Development Management Forums

6.18 Two Camden led Development Management Forums (DMFs) were held on 2 February 2021 and 25 May 2021 respectively.



DMF 1 – 2 February 2021

- 6.19 Approximately 30 registered to attend the DMF with additional people watching the live stream.
- 6.20 The majority of questions related to the community aspects of the development, including spaces for community use, the story garden, community benefits and job opportunities for the local community. Other questions related to the design of the development, sustainability, construction impact, CR2, and potential impacts on views.

DMF 2 - 25 May 2021

- 6.21 In total, 24 people registered to attend the DMF with additional people watching the live stream.
- 6.22 Questions at the second DMF related to the story garden, land use split, policy, opportunities for work experience, construction timescales, safety during construction, light pollution and heritage impacts.
- 6.23 A more detailed summary of both DMFs can be found within the Statement of Community Involvement prepared by LCA.

Design Review Panels

6.24 The Applicants attended two Design Review Panels on 23 October 2020 and 21 May 2021.

DRP 1 – 23 October 2020

- 6.25 The DRP applauded the ambition of the British Library and LB Camden to create a sustainable, inclusive and outward looking building which brings together social value to existing communities. The Panel was clear that ensuring the proposals feel public and welcoming was of paramount importance, and that the substantial amount of lab and office space proposed should not detract from the civic presence of the BL and its public spaces.
- 6.26 The Panel stated that they found much to admire in the idea of the foyer with the potential for this to be a destination at the convergence of the north-south and east-west routes. However, it was outlined that to ensure that the foyer feels truly public, the scheme should



carefully review how the security requirements for the space were implemented in the development.

- 6.27 The DRP viewed the sustainability strategy as encouraging and expressed a desire to see this celebrated in the architecture and public realm. The Panel considered net zero carbon to be an unrealistic target for a building containing lab spaces and was clear that the Applicants should set clear sustainability targets. The Panel were clear that a focus should be given to exploring the potential to deliver meaningful public realm and landscaping at the Ossulston Street side of the Site.
- 6.28 Following the first DRP, the Applicants sought to make significant responses to the consultation issues in the design of the scheme. In summary, these were:
 - Redefining the Ossulston Street and Midland Road frontages to maximise the landscaped open space and civic presence, including the shift of the north wing of the proposed building to the east to create a significant area of public open space on Ossulston Street and opposite Levita House;
 - Introduction of cellular retail units to integrate the public open space and the street level
 of the new building, providing a human-scale environment with greater continuity
 between the inside and outside areas;
 - External use of anodised aluminium and glass echoing the timber and glass architecture
 of the internal foyer spaces representing a warm, tactile material devoid of corporate
 associations;
 - A design solution to the foyer operation and management to enable access for members of the public and visitors to the BL facilities throughout the year; and
 - Reduction in height of the cores and plant enclosure at roof level to mitigate impacts in local views.

DRP 2 - 21 May 2021

6.29 The Panel was encouraged by the development of the design since the previous review and considered it had improved significantly with the potential to create a high-quality public building. It did raise questions surrounding the public realm, landscape design, public access and social value and the Panel considered that further work was needed to support a meaningful sense of community and connection at street and lower ground floor level.



- 6.30 The new foyer space was considered to have capacity to be more accessible and to house activities that would draw local people in. However, the Panel outlined that the landscaping of the public realm on Dangoor Walk and Ossulston Street appeared defensive, with the DRP suggesting enclosed space should be opened with planting relaxed to deliver safe, welcoming pedestrian routes that would respond to the dynamic nature of the lower ground floor façade. The Panel noted the importance of a suitable robust planting strategy to ensure external public spaces are of high quality.
- 6.31 It was made clear that security and management arrangements for public spaces, both inside and outside of the building, would be crucial to balancing a high intensity of uses and ensuring the building is perceived as open and welcoming. The impact of the building's massing on townscape views was also considered to be important to the Panel, particularly from views further away than those presented at the review.

Commissioning Groups

- 6.32 To ensure that all members of the local community were given the opportunity to have their say on the Proposed Development, the Applicants commissioned five community groups within Somers Town to conduct consultation on the Proposed Development on their behalf.

 The groups were:
 - i. Somers Town Space Community Interest Company;
 - ii. Somali Youth Development Resource Centre;
 - iii. Age UK Life;
 - iv. After Hummus;
 - v. King's Cross Brunswick Neighbourhood Association; and
 - vi. West Euston Partnership.
- 6.33 There have also been several meetings with local groups including the local history club. The Applicants have consistently engaged with local organisations since 2017 as part of the consultation process.
- 6.34 The key findings of the feedback are summarised below:



- i. The need to work in partnership with the community, involving them in planning decisions and the planning of activities.
- ii. Desire to showcase local heritage and cultures, to enable everyone to feel welcome and included in what goes on.
- iii. To support local young entrepreneurs and businesses, building on the existing services and support offered by the British Library.
- iv. To collaborate with local people on job and training opportunities, as well as events and other opportunities for networking.
- v. To support learning and provide study opportunities for people of all ages, from school children to adults.
- 6.35 Paragraphs 4.26-4.34 of the Statement of Community Involvement sets out the methodology for this work.

Third Parties

GLA

- 6.36 Initial engagement on the concept proposals were held in late 2017. Three meetings were held with the GLA between September 2020 and July 2021. Topics included a project briefing, design, sustainability, transport and viability.
- 6.37 The GLA's formal pre-application response on design was received on 2 November 2021 and stated that the proposed design had progressed positively through the pre-application process. The response outlined that the ground level condition provided appropriately located and proportioned public realm and improved pedestrian connectivity through the site. The GLA also considered that the proposed design presented a sensitive response to the site's complex heritage context, whilst still capable of accommodating new and expanded uses in a high-quality environment.
- 6.38 The GLA's sustainability response was received in April 2021 and advised that the Applicant's aspiration to achieve net zero carbon and commitment to sustainability principles were welcomed.



Historic England

- 6.39 Between the months of November 2020 and July of 2021 meetings were held with Historic England (HE) covering the following topics:
 - Views and setting;
 - Interventions into the listed fabric; and
 - Level 1 terrace treatment.
- 6.40 HE provided initial feedback on the views of the Proposed Development, dated 16 June, stating that the presence of built volume over the barrel vault of St Pancras Station and the clock tower of King's Cross Station would cause a low level of harm to those heritage assets because their upper profiles are marginally less discernible against clear sky. It was noted that this would be limited to a few views from Gray's Inn Road and Pentonville Road that are not of the highest significance in terms of the setting of those heritage assets. HE concluded that they were likely to recommend that LB Camden weigh this harm in the balance against the proposed public benefits of the scheme.
- 6.41 Final pre-application feedback (ref: PA00535825) was received on 22 July 2021, which stated that HE considered the proposed development would cause a "low degree of less than substantial harm to the significance of the Grade I listed library and the setting of the other heritage assets in the area".
- 6.42 Subsequent to the receipt of HE's formal pre-application response, HE officers confirmed their support of the revised design of the proposed 'portal' in the Level 1 courtyard (via email, 12 August 2021).

Crossrail 2

6.43 Consultation on the impact of the CR2 safeguarding infrastructure on the proposed extension to the British Library began in 2014. The Department for Transport issued a letter to the then Deputy Prime Minister, dated 6 Nov 2014, assuring that the CR2 works at the Site would be undertaken in a way that minimises the impact on the long-term development plans of the BL. TfL committed in this letter to work with the BL to ensure that the plans for CR2 would be integrated with plans to development the land to the north of the BL.



6.44 Thorough consultation with CR2 has been ongoing and the Applicants commit to continue to engage and consult with CR2. The Applicants have entered into an agreement with CR2 regarding the delivery of station works this has included a design to Stage 2 included in a multi-disciplinary report which has been signed off by TfL (December 2021).

Francis Crick Institute (FCI)

- 6.45 Regular meetings with the FCI have been held covering statutory and development issues related to building on the neighbouring site.
- 6.46 The Applicants have made presentations to the senior management team at the FCI who have been positive about the proposed development and the creation of better connections at ground floor level between Dangoor Walk and the application Site, including removing the exiting fence, enabling the area to be treated as a coherent comprehensive design.
- 6.47 The Applicants are also working up a neighbourly agreement with the FCI as a result of the monthly meetings and following discussions on practical issues associated with developing the adjoining site.
- 6.48 The Applicants continue to regularly engage with the FCI to seek measures to minimise the Proposed Development's impact on the FCI's operations.

The Metropolitan Police / Security

- 6.49 The development proposals have been presented to the Counter Terrorism Security Advisor (CTSA) and a Designing Out Crime Officer (DOCO) specialist officers with the Metropolitan Police Service (MPS). Their input on threats and design have been incorporated into the design.
- 6.50 The security design team at Arup also consulted the British Library's Threat and Vulnerability Assessment (2020) and security requirements, to ensure alignment, as well as having regular consultations with the British Library security team.



High Speed 1 (HS1)

6.51 A meeting with HS1 took place on 13 November 2020. The meeting was held to ensure that HS1 representatives had the opportunity to review, and ask questions about, the Proposed Development.

Environmental Impact Assessment

The proposed development is an urban development project under Schedule 2, 10(b) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). The Applicants volunteered to undertake an Environmental Impact Assessment (EIA) and Arup submitted an ES Scoping Opinion request to LB Camden on 29 April 2021. The EIA Scoping Opinion (ref: 2021/2164/P) was received from LB Camden on 28 June 2021. The recommendations in that opinion report have been incorporated into the submitted Environmental Statement (ES), prepared by Arup. A Non-Technical Summary of the ES has also been submitted in support of the applications.

Summary

- 6.53 The consultation strategy has been extensive and has sought to engage with statutory and non-statutory consultees including residents, local businesses, community groups and elected representatives throughout the design process.
- 6.54 The application proposals have been revised, where possible, to reflect comments raised throughout consultation, particularly in relation to the proposed building design, public open space and public realm.
- 6.55 The Applicants are committed to continued engagement with neighbours and the Local Planning Authority throughout the application determination process and into the construction phase.



7 Planning Policy Framework and Legislation

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 7.2 Planning policy operates at national, regional and local levels. At a national level, Central Government adopted the first National Planning Policy Framework (NPPF) in March 2012. The latest version of the NPPF was published in July 2021.
- 7.3 The statutory development plan for the Site comprises at a regional level the London Plan (2021) and at the local level LB Camden's Local Plan (2017) and the Site Allocations Plan (2013). There is no adopted Neighbourhood Plan for this area.

National Planning Policy Framework (2021)

- 7.4 The (NPPF) sets out core planning principles that underpin both plan-making and decision-taking. It is a material consideration in the determining of all planning applications.
- 7.5 The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF explains that the policies of the NPPF taken as a whole constitute what the Government considers sustainable development to mean in practice.
- 7.6 The presumption in favour of sustainable development is intended to ensure that the planning system focuses on opportunities for positive growth, making economic, environmental and social progress for current and future generations. The presumption, in practice, means that significant weight should be placed on the need to support economic growth through the planning system and local planning authorities should plan positively for new development and approve all individual proposals wherever possible. However, development should not be allowed if it would undermine the key principles for sustainability in the NPPF. The NPPF makes clear that the policies should apply "unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits" (paragraph 11(b)).
- 7.7 Specifically, paragraph 81(b) states that the planning policies positively and proactively encourage sustainable economic growth.



7.8 Section 16 of the NPPF states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. In terms of listed buildings, paragraph 200 states that any harm to, or loss of, the significance of a designated heritage assets should require clear and convincing justification. Paragraph 201 states that where a development proposal would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Planning Practice Guidance, 2014 (as amended)

7.9 The Planning Practice Guidance was first produced and published by the Department of Communities and Local Government ('DCLG') in March 2014 to cover a range of topics which have been varied and supplemented on a number of occasions since.

The Statutory Development Plan

Regional Planning Policy

- 7.10 The London Plan ('LP') was published on 2 March 2021 and is the Spatial Development Strategy for Greater London, setting a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The London Plan forms the London-wide policy context within which the boroughs set their local planning agendas and forms part of the Statutory Development Plan.
- 7.11 The London View Management Framework (2012) is a Supplementary Planning Guidance (SPG) document which seeks to designate, protect and manage twenty-seven views of London and some of its major landmarks. The purpose of the document is to explain in greater detail the policy approach so that boroughs, applicants and other statutory authorities can assess a proposal's compliance with the London Plan.

Local Planning Policy

7.12 At the local level, LB Camden's Local Plan (2017) was adopted by Council on 3 July 2017,replacing the Core Strategy and LB Camden Development Policies documents. This, coupled with LB Camden's Site Allocations Plan (2013) forms the local tier of the



Development Plan and is therefore central to planning decisions and the control of future developments in the Borough.

Site Designations

- 7.13 The key planning policy designations relating to the Site are summarised below:
 - Central London Area (Clear Zone Region) (CLA);
 - Designated View 6A.1 Blackheath Point to St. Paul's Cathedral right lateral assessment area (crosses the Site at its south-western corner);
 - Site Allocation 5 Midland Road Site.

Other Material Considerations

Supplementary Planning Guidance

- 7.14 The following LB Camden Supplementary Planning Documents (SPDs) are relevance to this application and form material considerations in the determination of the application:
 - Camden Planning Guidance Design (January 2021);
 - Camden Planning Guidance Access for All (March 2019);
 - Camden Planning Guidance Basements (January 2021);
 - Camden Planning Guidance Employment Sites and Business Premises (January 2021);
 - Camden Planning Guidance Energy Efficiency and Adaptation (January 2021);
 - Camden Planning Guidance Housing (January 2021);
 - Camden Planning Guidance Amenity (January 2021);
 - Camden Planning Guidance Public Open Space (January 2021);
 - Camden Planning Guidance Air Quality (January 2021);
 - Camden Planning Guidance Transport (January 2021);
 - Camden Planning Guidance Trees (March 2019);
 - Camden Planning Guidance Developer Contributions (March 2019); and
 - Camden Planning Guidance Water and Flooding (March 2019).
- 7.15 The following GLA Supplementary Planning Guidance documents are also material considerations:



- Affordable Housing and Viability (August 2017);
- Accessible London: Achieving an Inclusive Environment (October 2014);
- Shaping Neighbourhoods: Character and Context (June 2014);
- Sustainable Design and Construction (April 2014);
- Energy Planning Guidance (updated April 2020);
- The Control of Dust and Emissions during Construction and Demolition (July 2014).
- 7.16 The GLA currently has a number of emerging Supplementary Planning Guidance documents at draft stage. Consideration has been given to these documents in the assessment of the scheme:
 - Air Quality Positive (consultation due);
 - Fire Safety (consultation due);
 - Transport Land (consultation due);
 - Urban Greening Factor (consultation due);
 - Sustainable Transport, Walking and Cycling (draft)
 - Circular Economy Statements (Oct 2020);
 - 'Be Seen' Energy Monitoring Guidance (Oct 2020); and
 - Whole Life Carbon Assessments (Oct 2020).

Emerging Planning Policy

- 7.17 In early 2020 LB Camden consulted on their draft Site Allocations Local Plan. The plan identifies several key development sites and areas across LB Camden, including the application Site (draft Policy IDS 19) and the Knowledge Quarter (draft Policy KQ1). LB Camden has just concluded a further consultation on this draft DPD. Once updated and adopted this Development Plan Document (DPD) will supersede the 2013 Site Allocations Plan.
- 7.18 The Site is also located within the Somers Town Neighbourhood Area. A draft Neighbourhood Plan was published in 2016. The draft plan has not been adopted.



Emerging Site Designations

7.19 As previously mentioned, the Site is subject to Draft Site Allocation: "IDS19 – Land to the rear of the British Library". This is being consulted on. The Draft Site Allocation is summarised in the Site and Surroundings chapter (para 1.19).

Further Statutory Planning Legislation

- 7.20 Given the Site's location near the King's Cross St Pancras Conservation Area and the presence of statutorily listed buildings both within the application Site and nearby, statutory legislation regarding the historic environment is relevant to this planning application.
- 7.21 Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require that when considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Draft Neighbourhood Plan

- 7.22 The Neighbourhood Planning (General) Regulations (2012) aims to give local communities greater power to shape development by taking a more active role in the development of planning policies at local level. A community can apply to designate a Neighbourhood Area and establish a Neighbourhood Forum and can produce a Neighbourhood Plan (NP). NPs must be in conformity with the strategic policies in the Local Planning Authority's adopted Local Plan.
- 7.23 On 13 June 2013 LB Camden approved the designation of the Somers Town Neighbourhood Area and Neighbourhood Forum. The Site is within the Somers Town Neighbourhood Area.
- 7.24 The draft Somers Town Neighbourhood Plan was published in 2016. Paragraph 1.2 of the draft NP sets out the objectives of the Somers Town Neighbourhood Forum and the draft suggested policies cover topics including: local economy and employment; meanwhile use; movement; housing and building; environment, green space and air quality; and community and cultural facilities.



7.25 Although the NP usefully indicates local needs, as the NP is in draft form it is afforded limited weight in planning decisions.

Key Planning Considerations

- 7.26 The key planning considerations associated with the proposed development are:
 - a) Land use;
 - b) Design;
 - c) Heritage, Townscape and Views;
 - d) Landscape and Public Realm;
 - e) Energy and Sustainability;
 - f) Amenity;
 - g) Transport, Access and Servicing; and
 - h) Any other material planning considerations.
- 7.27 In the following section of the Planning Statement, we address each of the key planning considerations noted above, in addition to other policy considerations, having regard to the Development Plan as a whole, and any wider material considerations.



8 Land Use

8.1 This section assesses the development proposals in terms of land use.

Principle of Redevelopment

NPPF

8.2 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development.

London Plan

- 8.3 Chapter 1 of the London Plan sets out how growth should be managed in the Capital to build strong and inclusive communities, making the best use of land, creating a healthy city, delivering the homes Londoners need, growing a good economy and increasing efficiency and resilience.
- 8.4 The Site sits within the Central Activities Zone (CAZ) which covers London's geographic, economic and administrative core. The CAZ brings together the largest concentration of London's financial and globally-oriented business services. London Plan Policies SD4 and SD5 support mixed-use development which will enhance and promote the unique international, national and London wide roles of the CAZ.
- 8.5 The Site is situated immediately to the west of the King's Cross Opportunity Area, which the London Plan identifies and promotes as being capable of accommodating substantial development to provide new jobs or homes. The Site is also to the east of the Euston Opportunity Area which the London Plan identifies and promotes as having significant potential for intensification, capable of becoming a world-class transport interchange and new residential and business district. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application Site.



Camden Local Plan

- 8.6 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the Site, providing a mix of uses in accessible parts of the Borough (including self-contained housing) to deliver 16,800 new homes, 695,000sqm of new office floorspace and 30,000 sqm of new retail floorspace by 2031. The Council anticipate the most significant growth to be delivered across the Borough, with Central London playing a key role in facilitating that growth.
- 8.7 The Site occupies a large and strategically important Site within LB Camden's Central London area which has significant potential for mixed use development. The Site is allocated under Site Allocation 5 (2013) for development that "meets the future operational needs of the British Library and/or a mix of uses including other complementary Central London uses which could include offices, culture, tourism, leisure, housing and community use".
- 8.8 The Site is an allocated development Site in LB Camden's Draft Site Allocations Development Plan Document. The drat allocation provides that the Site is allocated for a mixed-use development that complements and supports the expansion plans and future service needs of the British Library, including cultural, commercial and community uses and in particular uses related to the knowledge and innovation economy.
- 8.9 The Site is safeguarded for CR2 and is therefore required to incorporate essential infrastructure into the design.
- 8.10 The Site has historically been earmarked for the development of an extension to the British Library (see Image 1) and the Government approved the BL's request to pursue an extension at the Site on 16 March 2017.
- 8.11 The Proposed Development seeks to optimise partially previously developed urban land and a partially vacant brownfield site, which is exceptionally well served by public transport. The Proposed Development is in accordance with the character and established mix of uses in the surrounding area. The development would replace the BLCC and deliver a single basement, ground plus 12 storey commercial and Library development for use as offices (including labenabled space), retail, and an extension to the British Library to include a re-provided British Library Conservation Centre, space for the ATI, expanded BIPC, expanded learning facilities,



exhibition spaces and meeting spaces. The building incorporates a fully publicly accessible ground floor through the provision of a foyer space which has equal entrances on both the Ossulston Street and Midland Road facades. The development would also deliver essential CR2 infrastructure in an innovative way which ensures that the external public realm at the Site is of an excellent quality and that the amenity of surrounding occupiers is protected. The Applicants are proposing high quality landscaping across the Site, including the delivery of a 'Community Garden' for use by the local community.

8.12 The proposals are entirely consistent with the NPPF, London Plan policies SD4 and SD5, and Local Plan Policy G1.

Library Use (Class F1)

Planning Policy

- 8.13 London Plan Policy HC5 outlines that the continued growth and evolution of London's diverse cultural facilities and creative industries is supported. Development proposals should protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity.
- 8.14 Policy HC5 also adds that development should seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues and/or facilities and spaces for outdoor cultural events.
- 8.15 Policy SD4(F) seeks to promote and enhance the unique concentration of cultural, arts, entertainment, night-time economy and tourism.

Camden Local Plan

- 8.16 Adopted Site Allocation 5 supports the use of the Site for an extension to the British Library.
- 8.17 Policy C2 of LB Camden's Local Plan states that the Council will work with its partners to ensure that community facilities and services (including libraries) are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services. Through Policy C3, LB Camden expect the siting of new cultural and leisure facilities, including the expansion of existing provision, to consider its associated impacts. Large-scale facilities should be located such that as many people as possible can enjoy and make use of



public transport to visit. Policy C3 goes on to state that, exceptionally, it may be practicable to re-provide a cultural facility on Site through redevelopment and lists what the Council will consider when assessing such proposals (i-iv). Policy C3 states that if a replacement facility is provided, it should be of the same or better standard than the facility that is lost and accessible to existing users.

8.18 Through LB Camden's CPG on Community Uses (January 2021) the Council sets out its aspiration to ensure that premises in community use are retained but recognises that the floorspace needs of individual services are influenced by changing operational practices and the use of technology.

Emerging Policy

- 8.19 Emerging Site Allocation IDS19 supports the use of the Site for an extension to the British Library. The Site Allocation along with draft policy KQ1 requires any development to deliver social value.
- 8.20 Draft Policy KQ1 parts (a) and (b) required major proposals in the KQ to demonstrate that they have been developed in a collaborative way with other key stakeholders in the wider innovation district and potentially to meet the needs beyond the knowledge sector. The emerging policy goes on to state that applications should be supported by evidence that the type of floorspace being provided appropriately reflects current and emerging needs of the knowledge economy and would complement and support other institutions and companies that contribute directly to the success of the innovation district.

<u>Assessment</u>

8.21 As part of the proposed development, the existing BLCC facility is proposed to be demolished. Local Plan Policy C3 allows for exceptional circumstances where cultural facilities can be reprovided within site redevelopments, so long as they are of the same or better standard and are accessible to existing users. The BLCC would be fully re-provided within the proposed building envelope. This is considered acceptable as the proposed BLCC facilities would be of a significantly higher quality than that of the existing and would continue to be accessible to existing users as well as new users. Furthermore, the loss of the existing BLCC would enable



the creation of the wider BL facilities proposed, approximately 10,000 sqm GIA in total and the essential CR2 infrastructure required under the Site.

- 8.22 The proposed Library facilities have been designed to be accessible to all and can be adapted to reflect changing local community needs, in line with Local Plan Policy C2. Extensive consultation with the local community has been undertaken to ensure that the use of the Library floorspace meets the needs of the community and is welcoming and useful to them, alongside meeting the objectives of the British Library. The nature of the use of the publicly accessible ground floor foyer space is adaptable and it is intended that there would be a cocuration programme with locals in respect of specific exhibitions and events.
- 8.23 The Proposed Development meets the tests of emerging Policy KQ1 as the provision of 11,497 sqm GIA of Library floorspace would clearly meet current needs in the knowledge economy and would support the British Library which would in turn contribute to the success of the innovation district. The Proposed Development also meets part (a) of the draft policy as it has been developed in a collaborative way with the British Library and prospective life science occupiers to ensure that their needs from the space are met. The delivery of both the Library and the commercial, including lab-enabled floorspace would allow for needs beyond the knowledge sector to be met as they would unlock a suite of public benefits and £27.2m of social value over a period of 8 years⁶.
- 8.24 The application is supported by an Economic Value and Knowledge Quarter Uses Statement, prepared by Arup, which demonstrates that the proposed development would meet the emerging needs of the knowledge economy. The report demonstrates that the Proposed Development would deliver more than 3,000 new jobs, a significant number.
- 8.25 The Social Value Framework (SVF), prepared by Arup, demonstrates how the Library spaces would be utilised to provide exceptional public benefits in line with draft policy KQ1 (g). The Applicants have worked collaboratively to build the SVF and would continue to work together to ensure that the objectives and values are delivered during the construction and occupation phases of the development.

⁶ As demonstrated in the Social Value Framework, prepared by Arup.



- 8.26 The proposal accords with Policy C3 as the extension to the BL has PTAL rating of 6b (the highest possible rating). The proposed Library extension would also be entirely publicly accessible to all.
- 8.27 The provision of additional Library floorspace would also accord with the intentions of LB Camden Local Plan Policy E3 'Tourism' which acknowledges the importance of tourism to the LB Camden economy and the British Library's role, as a major institution, in attracting high numbers of visitors throughout the year from London, the UK and beyond and contribute greatly to the vibrancy, image and economy of LB Camden and London as a whole.
- 8.28 The extension to the British Library is supported by Government ministers who originally approved the British Library's 'St Pancras Transformed' initiative and gave the go ahead for the British Library to pursue their development objectives on the Site.
- 8.29 Overall, the proposed Library floorspace to provide new learning, exhibition, BIPC and BLCC facilities is wholly supported in adopted and emerging planning policy at all levels and has Government support.

Commercial Office and Lab-Enabled Use (Class E)

National Planning Policy Framework

- 8.30 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century, stating that: 'significant weight should be placed on the need to support economic growth and productivity, taking into account wider opportunities for development' (para 81).
- 8.31 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment.

The London Plan (2021)

8.32 The Site is in the CAZ. The London Plan identifies the Site as a location where commercial use is supported. The LP recognises that the CAZ is the country's most important strategic office location. Policy SD 5 recognises the CAZ as being at the heart of London's world city offer and



- identifies a strategic priority to promote and coordinate development to provide a competitive, integrated and varied global business location.
- 8.33 Policy E1(A) of the London Plan outlines that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision and mixed-use development.
- 8.34 Policy SD4(G) seeks to promote and support the CAZ as a centre of excellence and specialist clusters, including functions of health, education and cultural activities.
- 8.35 Policy SD 5 states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development at this location in the CAZ.
- 8.36 Para 2.4.4 of the plan sets out that the strategic function of the CAZ includes uses connected with science, technology, media, communications and cultural sectors of regional, national and international importance (part d).

Local Planning Policy

- 8.37 At the local level, LB Camden Local Plan Policy E1 explains that the Council will secure a successful and inclusive economy in LB Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. In order to do so the policy says the Council will, among others, support and promote the development of the KQ, direct office development to the Central London Area and recognise the contribution of other employment uses including retail, education, health, markets, leisure and tourism.
- 8.38 Policy E2 of the Local Plan sets the policy context for the provision of new employment premises in the Borough. More specifically the wording of the policy states that LB Camden will consider a higher intensity redevelopment of sites that are considered suitable for continued business on the following conditions, among others:
 - i. the level of employment floorspace is increased or at least maintained;
 - ii. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
 - iii. the scheme would increase employment opportunities for local residents, including training and apprenticeships;



- iv. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the Site;
- v. for larger employment sites, any redevelopment is part of a comprehensive scheme.
- 8.39 LB Camden CPG Employment Site and Premises (para 73) states that for developments where an increase of 1,000sqm GIA or more is proposed, floorspace for SMEs should also be provided.
- 8.40 Site 5 'Midland Road Site Land to rear of the British Library' allocated the Site for mixed use development including offices.

Camden Draft Site Allocations

- 8.41 Draft Policy KQ1 relates to the KQ and sets out what major development proposals for additional employment, research and/or learning floorspace must achieve. Parts b and c require applications to be supported by evidence that the type of floorspace provided appropriately reflects current and emerging needs in the knowledge economy and that development should seek to prioritise the creation of suitable floorspace for priority growth sectors.
- 8.42 In addition to this, the draft policy sets out that development proposals coming forward for specific sites within the Knowledge Quarter Innovation District, must accord with any relevant individual site allocations.
- 8.43 Draft Site allocation IDS 19 states that the Site is allocated for a mixed-use development that complements and supports the expansion plans and future service needs of the British Library, including commercial uses, and in particular uses related to the knowledge and innovation economy.
- 8.44 IDS 19 states that development must "Explore opportunities to provide a public facing hub/learning/employment/ resource centre for the Knowledge Quarter Innovation District."



Assessment

- The proposed use of the Site for commercial, including lab-enabled, floorspace is supported at all levels of planning policy. Policy SD4 of the London Plan identifies that nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, inclusive of the intensification and provision of sufficient space to meet a range of types and sizes of occupier. Part G of the policy goes onto identify that the CAZ should be supported as a centre of excellence and advises that the specialist clusters including functions of state, health, law, education, creative and cultural activities should be supported and promoted. Local Plan Policy E1 part E specifically identifies that Knowledge Quarter and advises that development within the Knowledge Quarter should be promoted. The Site is also allocated (both in adopted and emerging policy documents) for the development of commercial floorspace which would support KQ industries. Arup's report demonstrates that a total GVA of £2.4bn would be added to the economy because of the Proposed Development.
- 8.46 The proposal for the redevelopment of the land to the north of the British Library is set to contribute significantly to the Government's commitment to fostering the UK and London as a global standard-bearer for research and development which would in turn deliver huge benefits to the UK, both the national population through to the local communities in the heart of which this development sits.
- 8.47 As set out in the Design chapter of this Statement, the floorspace has been designed for all KQ occupiers, in line with the requirements of draft Policy KQ1. In line with draft policy KQ1, the floorplates are flexible and can be adapted over time. Each floor can be subdivided into a maximum of six separate tenancies. The core and servicing have been designed to support six tenancies per floor without any additional infrastructure requirement. In line with draft Policy KQ1(b) the floor to ceiling heights, floor loading, additional plant and riser space have also been specifically designed to enable the occupation of the proposed building by KQ occupiers (see page 10 of the DAS, prepared by RSHP).
- 8.48 Due to the greater depth and southern aspect, floors 2-7 inclusive of the south-wing of the proposed building have been identified as appropriate for lab-enabled floorspace. The base build for the on-floor servicing strategy (see RSHP's DAS page 125) integrates several key specification requirements for lab enablement in the south building (which would work in conjunction with a number of upgrades to the base build). The building has been designed



such that upgrades to lab use can be made on a floor-by-floor basis, in line with draft policy KQ1. For more details see page 125 of RSHP's DAS.

- As set out in Section 3 of this statement, the Site is in the heart of LB Camden's Knowledge Quarter Innovation District which is described as the home to a world-class cluster of scientific and knowledge-based institutions for companies that specialise in areas such as life-sciences, data and technology and creative industries. Owing to the Site's location in amongst this cluster (adjoining the FCI and ATI) and to the Site's excellent access to both national and international transportation hubs, it is ideally suited to a building that seeks to harbour innovation, research and development that would not just benefit the lives of local people but that would contribute to London and the UK as a centre for excellence in leading medical advancements in terms of medicines, vaccines and services.
- 8.50 Part F of the Local Plan policy E1 encourages premises to include floorspace suitable for startups, small and medium-sized enterprises, such as managed affordable workspace where viable. This is subject to ongoing discussions with LB Camden officers.
- 8.51 Paragraph 5.23 of the supporting text to Local Plan policy E1 relates specifically to the Knowledge Quarter and the science growth sector and states that "[LB Camden] will support the development of these industries and promote the development of the Knowledge Quarter around Euston and King's Cross". The proposals brought about by the redevelopment of the Site would undoubtedly contribute significantly to the Knowledge Quarter and would reinforce its overall vision and emerging reputation as a world-class knowledge hub for the 21st Century which seeks to raise awareness and leveraged support for innovation, collaboration and knowledge exchange. The proposed development would deliver 77,046 sqm of commercial floorspace, of which levels 2-7 of the south wing of the proposed building would be lab-enabled (47,600 sqm). The energy strategy has also been developed to enable lab use at levels 2-7, in line with KQ1. This directly responds to the policy objectives.
- 8.52 As set out in Section 2 of this Statement, the proposals have very much been developed with the four strategic priorities of the Knowledge Quarter Partnership at its core and have been informed by discussions between the Applicants and the British Library. The commercial, including lab-enabled, floorspace would enable the delivery of a significant number of



employment benefits during the operation of the development, as set out in the Social Value Framework, prepared by Arup.

8.53 Overall, the principle of commercial, including lab-enabled, floorspace is supported by adopted and emerging planning policy at all levels. This commercial space would fund the delivery of the BL space and CR2 infrastructure at no cost to the public purse.

Retail Use (Class E)

Planning Policy

8.54 The NPPF seeks to support the role that the town centre plays at the heart of local communities, taking a positive approach to their growth, management and adaptation (paragraph 86).

London Plan

- 8.55 London Plan Policy SD6 seeks to promote and enhance the vitality and viability of London's varied town centres. The policy recognises that a mix of vibrant town centre uses should be delivered (Part F).
- 8.56 Policy E9 of the London Plan advises that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported.

Camden Local Plan

- 8.57 Policy TC1 of LB Camden's Local Plan states that the Council will focus new shopping and related uses in LB Camden's designated growth areas and existing centres, having regard to the level of capacity available in these locations.
- 8.58 Policy TC2 advises that the Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. The Council will seek to protect and enhance the role and unique character of each of LB Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located.



- 8.59 Policy TC2 also outlines that new retail spaces should be of high quality, provide generous storey heights and incorporate room for signage.
- 8.60 Policy TC4 is clear that the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.
- 8.61 LB Camden's 'Town Centres and Retail' CPG (January 2021) identifies the Site to the north of the King's Cross Central London frontage. The Site is also nearby the designated Neighbourhood Centre of Chalton Street where local retailing is protected and supported.

<u>Assessment</u>

- 8.62 The scheme proposes to deliver 558 sqm (GIA) of retail floorspace. The Site is not located within a town centre or neighbourhood centre, where LB Camden seek to locate retail uses. The proposed retail offer would not challenge the character, function, viability or vitality of the Chalton Street Neighbourhood Centre to the east. The nature of the Site's proposed retail floorspace would be complementary to the Library and would activate the frontage of the northern façade of the building and would serve users and visitors to the proposed development, rather than redirecting footfall from Chalton Street.
- 8.63 The retail 'cells' are proposed to the northern façade of the proposed building and would activate this frontage introducing interactivity and permeability at street level and within the new external public open space. It is also intended that the retail use would draw visitors into the internal publicly accessible foyer space, as the 'cells' would provide internal connections through and an area for tables and chairs to be placed internally. This is considered a key benefit of the scheme as the existing Site has inaccessible and inactive frontages.
- 8.64 Signage zones have been designed into the building. Details of any signage would be subject to separate applications for advertisement consent.
- 8.65 Therefore, the provision of retail in this location is considered acceptable in this instance.



Mixed Use

Planning Policy

8.66 One of the core principles of the NPPF is to promote mixed use developments and encourage multiple benefits from the use of land. Chapter 5 of the NPPF provides a framework for delivering a sufficient supply of homes by setting out how Local Authorities should assess and plan for housing need to be met through sufficient land being available to meet housing need.

London Plan

- 8.67 Policy SD 6 of the London Plan seeks to continue to support the unique functions the CAZ fulfils for London, the UK and internationally, and the development needed to sustain it. The policy identifies a strategic priority to promote and coordinate development to provide a competitive, integrated and varied global business location.
- 8.68 London Plan Policy SD5 and paragraph 1.3.3 of the CAZ SPG sets out that offices and other CAZ strategic functions should be given greater weight relative to new residential development in the CAZ.

Camden Local Plan

- 8.69 Policy H1 of the LB Camden Local Plan sets out that self-contained housing is the priority land use across the Borough.
- 8.70 Policy H2 of the Local Plan seeks to achieve commensurate levels of self-contained housing whenever non-residential development is proposed to ensure a balance of uses across the Borough. The policy requires where more than 200sqm GIA of non-residential development is proposed in the Central London Area, 50% of the additional floorspace will be required to be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant.
- 8.71 Policy H2 sets out several factors that the Council will consider whether self-contained housing is required as part of a mix of uses (parts a-e). Where housing is required as part of a mix of uses, LB Camden require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately



be provided off-site, it will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu. In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, Policy H2 goes onto state the Council will consider criteria (a) I(e) and the additional criteria as set out in parts f-j.

8.72 Adopted Site Allocation 5 for the Site (page 31) states that: "an exception to the mixed use policy and the general requirement to include housing will be made if it is justified that proposed development supports the specific purposes of enhancing facilities and expansion of the British Library."

Draft Site Allocation DPD

- 8.73 Draft Policy KQ1 outlines that to ensure the sustainable growth and success of the Knowledge Quarter Innovation District, major proposals for additional employment, research and/or learning floorspace within it must contribute to the provision of new physical and social infrastructure to support the KQID, such as new homes.
- 8.74 The Draft Site-specific Allocation (Policy IDS19) does not require the delivery of self-contained homes on-site, stating that: "... Development must: (i) Contribute towards the provision of permanent self-contained homes". Paragraph 10.184 of the supporting text continues, setting out that the proposed "nature and balance" of acceptable uses within any proposed development at the Site, alongside the extent of any housing requirements on-site (or alternatively off-site) will be considered in light of (i) competing land use needs and (ii) other priorities and relevant policy criteria, including the extent to which proposals are publicly funded and support the investment plans and operational needs of the British Library.

<u>Assessment</u>

8.75 The development would serve a substantial public purpose through the delivery of an extension to the UK's national Library and the provision of CR2 infrastructure. As set out in paragraph 3.48 of the LB Camden Local Plan, Policy H2 does not apply to the proposed British Library, ATI and CR2 floorspace within the proposals as they are areas that would serve "a public purpose (such as providing transport infrastructure, land required for transport, or a dedicated facility for an educational, medical or research institution)". The Policy H2 assessment is based on the quantum of proposed commercial floorspace only (77,046 sqm GIA). In assessing the Proposed Development against Policy H2, it is considered that housing



is not required to be delivered on the British Library Site in accordance with the following policy criteria:

- a. the character of the development, the Site and the area;
- b. Site size, and any constraints on developing the Site for a mix of uses;
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;
- e. whether the development is publicly funded or serves a public purpose;
- g. the extent of any additional floorspace needed for an existing user;
- h. the impact of a mix of uses on the efficiency and overall quantum of development;
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.
- 8.76 The following paragraphs assess the scheme against the criteria set out above. In summary, the inclusion of housing on Site would prejudice the much-needed expansion of the British Library and all of the benefits and social value that flow from it, together with the potential for the further expansion of the Library in the long-term future. The commercial uses proposed have been intentionally designed to enable the future long-term expansion of the BL (as the freeholder of the Site) into these spaces, as well as meeting an identified need now for Knowledge Quarter uses at a Site that is physically located the heart of the KQ, sitting between the British Library and the FCI. The scarcity of land in the Knowledge Quarter is well known and this Site provides the best opportunity there is to deliver a substantial amount of commercial floorspace to meet the identified need and strengthen the Knowledge Quarter as London's premier life sciences cluster. The inclusion of housing on Site would prevent the Site meeting the objectives of the Knowledge Quarter and delivering all the economic, environmental and social benefits that are derived from it. There is no potential to create housing in addition to the commercial floorspace created due to design and heritage constraints of the Site, the delivery of CR2 infrastructure and importantly the much-needed creation of public open space for the local community.
- 8.77 The delivery of housing at the Site would prejudice the much-needed expansion of the British Library and its ability to expand further in future. Since the completion of the existing Library building, the British Library's operations have expanded such that they do not now fit within their existing floorspace. Historically, the application Site was intended for a larger Library,



and was then earmarked for redevelopment to provide an extension to the British Library when finding constraints limited the size of the original building. Plans from the development of the original design clearly show a larger Library building intended for the Site, and subsequent masterplans drawing up for the reduced Library building clearly note the application Site as 'Land intended for extension' (see Image 1). The UK Government approved the British Library's request to pursue an extension at the Site on 16 March 2017 (see Appendix D). The extension would contribute to the British Library's pursuit of its 'Living Knowledge For Everyone' strategy an integral part of fulfilling their mission statement ("we make our intellectual heritage accessible to everyone, for research, inspiration and enjoyment") under the six key objectives of: custodianship, research, business, culture, learning and international impact.

- 8.78 An absolute delivery requirement for the development is the creation of a total of 10,000 sqm (GIA) for Library and ATI use. This is set out in the St. Pancras Transformed business case which highlighted the requirement for this floorspace at the British Library in order to meet the changing needs of the Library's expanded audience in the twenty-first century. The proposed Library floorspace would provide approximately 10,000 sqm of exhibition and gallery spaces, public foyer, ATI accommodation and new learning and BIPC facilities. This floorspace would be publicly accessible. Whilst the proposed extension is designed to meet the needs of the Library today, the remainder of the Site, as the BL's only London Site, needs to provide an income to pay for the BL space, generate a continuous income stream to the Library, to fund the significant CR2 requirements that are a precondition of development of the Site and, in the longer term, allow for further expansion of the British Library as required, which clearly precludes the creation of permanent, self-contained homes on the Site.
- 8.79 The British Library needs to retain control of the land subject to this planning application in perpetuity in order to secure their continued use of the Site. It would therefore be inappropriate to sell leasehold interests to residential occupiers.
- 8.80 The most appropriate use of the remainder of the Site is for commercial uses, including labenabled floorspace. This meets policy objectives for this Site and location now and would allow for future conversion to laboratory floorspace should that be required.
- 8.81 The Site is in the CAZ, a defined area which seeks to prioritise and support the delivery of commercial uses over residential use (Policy SD5). London Plan (2021) Policy SD4 states that



the CAZ is a centre of excellence and specialist clusters which should be supported and promoted. The Site is located at the geographical heart of the Knowledge Quarter Innovation District (KQID) and should be considered one of the 'clusters' that supports the strategic function of the CAZ (see London Plan para 2.4.4) and in line with London Plan Policy SD4. Draft Policy KQ1 seeks to promote the delivery of floorspace which will create of suitable floorspace for priority growth sectors within the district such as life sciences, digital collections and machine learning. The Proposed Development would house a major extension to the British Library, commercial, including lab-enabled, floorspace and CR2 infrastructure, all of which would support the KQID as a world-class cluster of science and knowledge-based institutions. The Site is ideally located to deliver this given its proximity to St Pancras, Kings Cross and Euston national, international and underground railway stations and being neighbour to both the Francis Crick Institute (FCI), the ATI and the British Library, three established institutions of both national and international importance and contribution in the KQID.

- 8.82 More generally, there is a recognised need for additional employment floorspace in LB Camden. Local Plan Policies G1, E1 and E2 seek to secure the economy through creating conditions for economic growth and the protection and provision of employment floorspace. Paragraph 5.23 specifically seeks to support and promote Knowledge Quarter uses. As set out in the Draft Site Allocation, there is also a need for an extension to the British Library and employment floorspace which supports KQ industries and the life sciences sector. The Science and Innovation Audit's findings reinforces this, confirming the KQ's role as arguably the densest concentration of scientific and knowledge-based organisations anywhere in the world.
- In design and heritage terms, the height, bulk and mass of the proposed development on the Site has been rigorously tested throughout the pre-application period with LB Camden design and conservation officers as well as HE and the GLA. The Site is in a sensitive location in terms of the historic built environment given its proximity to several Grade I, II* and II listed buildings and designated conservation areas. It also sits within an LVMF viewing corridor. The overall development envelope has been informed by the surrounding context and has been shifted east on plan in response to consultations including the community to create more public open space at ground floor level, most notably along the Ossulston Street façade, which faces onto residential properties within Levita House. It is not possible to accommodate any residential floorspace in addition to the Library and commercial uses proposed within the limits of the



agreed envelope in addition to it not being appropriate for a national institution to be required to provide this when land under their ownership is required for their operations.

- 8.84 Another key Local Plan objective is the provision of public open space within Somers Town (para 2.66). The design at ground floor level has been carefully detailed to enable the delivery of substantial new areas of public open space, including a Community Garden. This was created in response to the thorough consultation exercise with local residents and was a key priority for participants as there is a deficiency of public open space in this area.
- 8.85 Part of the Site is also dedicated to the delivery of CR2 infrastructure which is of both local and national importance and once delivered would generate benefits for LB Camden residents in the immediately surrounding area and the wider borough as well as providing exceptional connections for visitors and businesses. LB Camden confirmed in October 2015 that they support CR2 "because of the transport benefits that it offers to Camden residents. By reducing congestion on current transport routes the scheme could mean faster and less crowded train and bus journeys for people who live in Camden and better access to employment opportunities"
- 8.86 Emerging LB Camden policy also requires development at the Site to deliver substantial social value. The Social Value Framework, prepared by Arup, and submitted in support of this application, has been thoroughly consulted on at meetings held with LB Camden's inclusive economy, STEAM and planning officers. The substantial benefits created by the proposed development address the priorities of the LB Camden 2025 Strategy and the associated Camden Social Value Framework, ie: Strong growth and access to job, Clean, vibrant and sustainable places, Safe, strong and open communities and Healthy independent lives. The benefits from the scheme would be derived during the planning, construction and occupation phases of the development. The benefits from the occupation of the development would be compromised if on-site housing was included within the development as this would reduce capacity at this important KQ Site for commercial and British Library space from which key and unique benefits would be derived.
- 8.87 Whilst the need for more homes in LB Camden is recognised by the Applicants, it would be inappropriate to require a development at this key Site within the CAZ and the KQID to deliver

⁷ Camden dismayed as revised Crossrail 2 plans threaten council tenants and businesses



permanent self-contained homes on-site. The Draft Site Allocation (IDS19) acknowledges that the balance of the 'nature and purpose' of the proposed acceptable land uses and the wider public benefits and considerations of the scheme would be taken into account when determining the requirement for on-site self-contained housing. It has been demonstrated here that residential use would not be commensurate with the adopted and draft site allocation aims for the Site and would restrict the use of the land as an extension to a national public Library, the delivery of Crossrail infrastructure, public open space and the provision of a substantial quantum of commercial, including lab-enabled, floorspace which would meet the Statutory Development Plan objectives to promote, support and enhance employment, innovation and knowledge sector uses in this location at the very heart of the KQID and within the CAZ.

8.88 Not providing housing on-site therefore meets the criteria within Policy H2 parts a, b, d, e, g, h and j.

Off-site provision

- 8.89 The British Library do not own any other sites within LB Camden or London. The British Library do not have the ability to purchase a site to deliver any off-site housing as the scheme must be delivered at no additional cost to the public purse.
- 8.90 The Secretary of State's letter, dated 16 March 2017, states that the Applicant must assume the financial risks associated with the CR2 delivery which requires unusual civil engineering in construction, and therefore presents additional risk to the project.
- 8.91 SMBL are not able to viably fund the purchase of a donor site for the delivery of off-site housing as is set out in the below section.

Payment-in-lieu (PiL) of housing

- 8.92 Given the Site's nationally and internationally important and strategic location at the geographical heart of the KQID and the intended use of the Site as an extension to a national institution alongside Knowledge Quarter employment uses and that the Applicants do not own, nor has the capacity to acquire, a donor site, it is appropriate that housing should not be provided on-site or via off-site residential floorspace.
- 8.93 The Proposed Development would make a significant investment in delivering an extension to the British Library at no cost to the public purse and in constructing CR2 infrastructure on



the Site. The Applicants are however fully aware of the Borough's need for more housing and are therefore in discussion with LB Camden officers to explore potential options to facilitate the delivery affordable housing in the Somers Town area.

Crossrail Infrastructure

- 8.94 The Site is safeguarded on sheet 25 of the CR2 Safeguarding Directions Plans (March 2015).
- 8.95 London Plan Policy T3 states that development decisions should give particular priority to securing and supporting the delivery of CR2 and paragraph 10.3.8 states that CR2 is essential to London's future.
- 8.96 A press release on LB Camden's website, dated 27 October 2015 states that "Camden Council supports Crossrail 2 in principle because of the transport benefits that it offers to Camden residents."8 LB Camden's support is reflected in their consultation response to the draft London Plan, dated Dec 2017 (p. 44), which stated that LB Camden saw CR2 as a "project which has the potential to bring much economic benefit to Camden and London as a whole" and that they also recognise the contribution CR2 would have to housing and the economy.9
- 8.97 This support is clearly followed through into LB Camden's adopted Local Plan (2017). The Local Plan states that projects which provide new and improved transport infrastructure will play a central role in supporting growth and promoting sustainable transport within the borough. As major development will largely be concentrated in locations that are, or will be, subject to significant transport improvements, LB Camden believe that land and facilities will therefore need to be safeguarded in order to ensure delivery of these projects (Local Plan, paragraph 10.22).
- 8.98 LB Camden Local Plan T3 (a) states that LB Camden will seek improvements to transport infrastructure in the borough and that it will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects.

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⁸ Camden dismayed as revised Crossrail 2 plans threaten council tenants and businesses

⁹ London Borough of Camden (3060).pdf



- 8.99 Supporting text 10.24 adds that, given the constraints on transport capacity in a densely developed borough like LB Camden, almost every part of existing transport infrastructure is "a valuable asset". The Council will therefore seek to protect all existing and proposed transport facilities and links and safeguard the potential for improvements to the transport network
- 8.100 In 2020 TfL and the Government reached an agreement to temporarily pause the CR2 project. However, the CR2 team continues to support the work of refreshing the 2015 safeguarding directions in order to protect the route from future development. The Mayor continues to see CR2 as an essential long-term infrastructure project for the future growth of London.

Assessment

- 8.101 The proposed development incorporates CR2 infrastructure. The design of the infrastructure has been subject to extensive consultation and agreement with CR2 and TfL to bring forward an innovative design solution.
- 8.102 Therefore, in terms of the CR2 infrastructure delivery, the proposals are wholly compliant with planning policy at all levels.



9 Design

- 9.1 This section assesses the proposals against relevant national, regional and local planning policy in terms of design.
- 9.2 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development.

Planning Policy

- 9.3 At a national level the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Chapter 12).
- 9.4 Paragraph 126 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 9.5 Paragraph 130 of the NPPF states that development should function well and add to the overall quality of the area over the lifetime of the development. In pursuance of this, development should be visually attractive, sympathetic to the local character and context, maintain a strong sense of place and distinctiveness.
- 9.6 While achieving this, development should optimise the potential use of the Site including delivering an appropriate mix of green and public space. The application of policy should not discourage appropriate innovation or change. Design quality should be considered throughout the evolution and assessment of individual proposals.
- 9.7 The NPPF identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (Paragraph 185).



Planning Practice Guidance

- 9.8 Paragraph 4 of the PPG on Design (2019), states that local planning authorities are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. It states that planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).
- 9.9 Paragraph 15 of the PPG on Design sets out the key characteristics of well-designed places.

London Plan

- 9.10 Policy D3 sets out how site capacity should be optimised through a design-led approach. The factors considered in this are: form and layout, experience and quality and character.
- 9.11 Policy D4 states that the design of development proposals should be thoroughly scrutinised in regard to its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping.
- 9.12 Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design.
- 9.13 Policy D9 requires the boroughs to provide a definition of 'tall building' for areas that have been identified as appropriate for tall buildings with future Development Plans identify these locations. Part C of the Policy D9 sets out the Visual, Functional and Environmental criteria against which tall buildings should be assessed.

Camden Local Plan

9.14 At a local level, Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use. The policy lists what characteristics LB Camden will expect to achieve this policy objective.



- 9.15 Policy D1 also sets out LB Camden's position on tall buildings. For the purposes of this policy, paragraph 7.35 states that 'tall buildings are considered to be those which are substantially taller than their neighbours or which significantly change the skyline'. Paragraph 7.36 of the Local Plan goes on to state that LB Camden have not defined areas where tall buildings will be appropriate given the diverse and mixed range of building heights in the borough.
- 9.16 Policy D3 (a-f) sets out what LB Camden will consider when assessing proposed shopfront designs.
- 9.17 LB Camden has also published a Planning Guidance CPG (January 2021) which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape.

Other Relevant Guidance

9.18 In terms of draft GLA guidance, the Public London Charter, which sets out eight objectives for both internal and external public realm in London, has been considered and assessed as part of the proposed design for the public realm.

<u>Assessment</u>

Design Development

- 9.19 The design of the building has been led by sustainability considerations and the Site's sensitive location nearby several statutorily listed buildings. The final proposed design has been informed by a series of workshops with LB Camden planning, design and conservation officers and meetings with HE and GLA officers. The design has also been presented to LB Camden's Design Review Panel (DRP) on two occasions and LB Camden's Strategic Panel.
- 9.20 Following the first DRP meeting, the feedback highlighted (i) the need to clearly demonstrate how sustainability was leading design decisions at the Site; (ii) the importance of delivering a building which felt accessible to all; (iii) the importance of delivering high quality external public open space for the local community; (v) the importance of townscape impact and how it would inform the design; and (iv) the importance of safeguarding the amenity of neighbouring properties. When the design was presented to the DRP on a second occasion, the panel were pleased that previous



comments had been incorporated into the design. Throughout the pre-application period the applicants have considered all comments received and where possible have incorporated the comments in the design.

9.21 LB Camden, GLA and HE officers have confirmed that they are supportive of the final proposed design.

Proposed Design

Principle of Demolition and Redevelopment

- 9.22 At the very earliest stage of the project, the design team considered development at the Site which retained the existing BLCC building. However, it was found that it was not possible to optimise the development potential of the Site whilst retaining the existing BLCC building. Arup have conducted a life cycle carbon assessment which demonstrates that, following a review of the Camden Energy Efficiency and Adaptation CPG, the most feasible option at the site is (iv) to reclaim and recycle the existing BLCC. This is discussed in more detail in Chapter 12 of this Statement.
- 9.23 As discussed in Section 10 of this Statement, the BLCC does not have any beneficial effects on the British Library in terms of views. The BLCC is unlisted and is explicitly excluded from the HE listing citation (See Appendix B). According to the Heritage Statement (p. 17), the BLCC does have limited interest due to its use, however the BLCC uses would be re-provided within the extension.

Height, Bulk and Mass

- 9.24 London Plan (2021) Policy D9 requires boroughs to define [in future] Development Plans what they consider to be a tall building for specific locations and identify suitable locations for tall buildings. The supporting text to LB Camden's Local Plan (2017) Policy D1 set out that tall buildings are those which are "substantially taller than their neighbours or which significantly change the skyline", but the Plan does not identify specific sites for future tall buildings, due to the diverse nature of the Borough, and so advocates a site-by-site assessment of suitability. The proposed building would be commensurate with the heights of buildings surrounding it, such as the FCI, and considerably lower than Brill Place tower and would therefore not be substantially taller than its neighbours or significantly change the skyline.
- 9.25 If the Council considers that the proposals should be treated as a tall building pursuant to Policy D9 of the London Plan, then Policy DP9 (C) is satisfied as demonstrated within this submission. London



Plan policy D9 part C requires the potential Visual (cover in the DAS and ES), Functional (covered in the DAS, Planning Statement and ES) and Environmental Impacts (covered in the ES) effects to be assessed. The Proposed Development also provides public access as sought by Policy D9, part D. In assessing these Visual, Functional and Environmental impacts it is concluded that the proposed building complies with both London Plan Policy D9 and Camden Local Plan Policy D1.

- 9.26 During pre-application discussions, the building was 'shifted' to the east in response to LB Camden's design feedback and direct consultation with the community. The final DRP response considered that the overall design and massing of the building had 'progressed positively' as a result of changes made in response to HE and LB Camden design officer comments and that the shift to the east had 'significantly improved' the appearance of the proposed building in views along Midland Road and its relationship with Ossulston Street. The DRP considered that the design details promised a 'very high quality building'.
- 9.27 The design of the proposed building has been carefully considered within its sensitive and historic setting. From the outset RSHP have sought to reflect the existing Grade I British Library's materiality and sloping roof elements within the extension. The building has been shifted to the east during pre-application discussions to respect local views and create a greater quantum of public open space for community use. The height of the stair cores on the northeast side of the proposed building were amended during pre-application discussions to improve views.
- 9.28 The response to the historic setting of the Site was the subject of extensive discussions with Historic England and is discussed in greater detail both in the heritage section of this Planning Statement and the TVBHA and Heritage Statement submitted with this application.

<u>Internal Arrangement</u>

9.29 The British Library functions are located at the lower floors and have all been designed as a result of extensive consultation with Library user groups and the Library brief to ensure that the spaces deliver optimum functionality for the Library. The exact internal layouts will however be subject to further refinement to reflect future needs. The Library floorspace would be open and clearly accessible and welcoming to the local community and visiting members of the public. The BLCC would be re-located to the southwest of the extension and would have floor to ceiling heights which would allow for a conservation studio where members of the public can visit. The BLCC's proposed relocation would also ensure that it is in a better location to interact with the wider Library facilities and will improve its accessibility to public. All the public functions of the British Library floorspace



could be accessed directly from public realm. The British Library foyer has entrances from the streetscape to the east, north and west and leads up to the learning, lecture, BIPC, events and BLCC spaces. All of which could be accessed from the terrace at level 1 and from the existing British Library.

- 9.30 As demonstrated in the DAS (page 41) sustainability considerations have led the decisions regarding internal layouts. The lab-enabled commercial floors are in the southern part of the proposed building (see DAS page 123 onwards) to optimise performance from a sustainability perspective.
- 9.31 As set out in the Land Use section of this Planning Statement the internal layout and arrangement of the proposed building has been specifically designed to be lab-enabled and respond to the current and emerging needs of the knowledge economy, in line with draft Policy KQ1. In line with Local Plan Policy D1 (d) each floorplate has also been designed to be flexible and adaptable.
- 9.32 Retail use at ground level would activate the streetscape on to the new area of external public open space. Originally, the retail facades at the Site were flush to the façade of the upper floors with a glazed materiality. Through detailed design discussions with LB Camden officers, the team have designed retail 'cells' which provide interest and movement to the ground floor of the Site along the northern façade. The materiality has been softened with timber added to give the retail facades a more human scale¹⁰. This would deliver permeable, animated and active frontages to this public facing façade. The retail 'cells' themselves are permeable, enabling a member of the public to enter the British Library foyer directly from the 'cell' and vice versa. This would encourage greater movement throughout the Site and would help to indicate to passing members of the public that the British Library located here and is accessible from the public realm to the south of Dangoor Walk.

British Library Foyer

9.33 The British Library foyer has been designed to be a democratic, publicly accessible space where all users are welcome and aware that the space forms part of the British Library. The foyer is a deliberately large open space to allow for flexibility in its use. It is proposed that the British Library Foyer could host events (to be run by the British Library, local community and/ or commercial

¹⁰ Subject to emerging fire legislation, however, it may not be possible to use timber externally. In this case, aluminium commensurate with the appearance of timber is proposed.



tenants) as well as providing a place for visitors to dwell, participate in activities, travel through east to west, and enter the Library from the north. The foyer would be further enlivened by the high-level walkways between the commercial, including lab-enabled, upper floors, which would be open to the foyer below.

- 9.34 As a result of DRP comments, careful consideration has been given to how the foyer would operate as part of the wider British Library and on its own. In direct response to this, seating areas have been designed into the stairs from the British Library foyer into the existing library so that the foyer can be a destination in of itself and one in which people can dwell and meet, access free wi-fi, charge mobile devices and catch up on emails. The foyer is designed to be adaptable to host a number of activities including the provision of displays and public art, providing a focal point celebrating local history and culture or simply a informal space to be enjoyed by families and children.
- 9.35 The British Library foyer would be versatile and be able to evolve over time to directly respond to changing needs and interests, of the British Library, the local community and KQ businesses / wider audiences (subject to the Library's future public funding model). The foyer would also provide direct access to the galleries and other Library facilities.

Level 1 Terrace

- 9.36 The proposed extension to the publicly accessible Level 1 Terrace would reflect the geometry of the existing restaurant and the 'cell' planting structures proposed to the ground floor public realm. A pergola is proposed to the eastern side of the terrace to provide an open-sheltered route linking the new extension to the existing library building. A portal window is proposed to the wall on the eastern side of the terrace which would allow users to look out from the terrace on to St Pancras, creating a moment of intrigue. HE and LB Camden officers have confirmed that they support the design of the proposed portal in principle.
- 9.37 The extended terrace area at level 1 would provide space for library users to dwell amongst greenery and would also provide multiple connections between the existing British Library building and the new extension, both internally and externally, linking the south of the British Library to the north for the first time. The terrace design could also be adapted for events as may be required throughout the year.



9.38 As part of the proposals, the existing listed trellis structure at the level 1 terrace would be removed.
Page 114 of the DAS sets out the alternative uses for the trellis considered. As set out in the DAS, following a thorough review, it has been determined that the trellis cannot be convincingly re-used and it is therefore proposed that the trellis is placed in storage for possible future re-use.

Outdoor Terrace Amenity Space (Commercial Occupiers)

- 9.39 Two outdoor amenity terraces for commercial occupiers are proposed, one at Level 2 and another at Level 8, in line with Local Plan Policy D1(L). The terraces would provide 175 sqm (Level 2) and 174 sqm (Level 8) of amenity space. The terraces have been designed with ecology and sustainability principles at their heart. The terrace layouts have been designed to maximise the opportunity for sunlight and greening. Each level would have its own distinctive plant habitats and will provide a diverse range of 'dwell' spaces for users of the commercial floorspace in the building along with ample space for movement. The terraces would be fully DDA accessible. Indicative furniture, planting and maintenance strategies have been provided in the report. Final details are anticipated to be reserved by planning condition.
- 9.40 Arup has prepared a Roof Terrace Strategy (see DAS Appendix 1) which demonstrates in greater detail how the outdoor amenity space at the terraces proposed on Levels 2 and 8 have been designed. The Roof Terrace Strategy shows that the amenity roof terraces, and the associated landscaping, would sit comfortably within the designs of the proposed elevations of the building.

Rooftop

- 9.41 Details of the rooftop layout are included at pages 140-141 of RSHP's DAS. The plant equipment has been arranged in a linear pattern to reflect the shape of the proposed building and mitigate its presence and impact in views as it is set away from sensitive roof edges. Low level screening is proposed to conceal piping serving the area. As a result of detailed discussions with LB Camden and HE officers, rooftop plant and the associated screening was pulled back from the eastern boundary of the southern roof to mitigate the impact on views of the Barlow Shed (St. Pancras) from Gray's Inn Road and Pentonville Road. Areas have been identified in the DAS (page 141) for future tenant plant. This is located centrally so as not to have any effect on views and ensures that future tenant plant has been planned for.
- 9.42 The cores have been carefully considered and are no higher than required. In discussions with HE, the escape stair core to the southeast of the proposed building was reduced in height to ensure



that it was not visible above the Barlow Shed in views from the east. The escape stair cores are on the outside of the building and the lift cores are located centrally as this represents the optimum for functionality of the lab-enabled building.

- 9.43 Arup's Roof Terrace Strategy demonstrates the designs for the rooftop in terms of greening and blue roofs. The inaccessible roof of the northern block of the Proposed Development would be a wetland roof which would include SUDS, maintenance functions and habitats for invertebrates, bats and birds. The roof of the southern block would be a grassland which would be planted as a grassland with intermittent pockets of woodland edge planting.
- 9.44 It is therefore considered that the Proposed Development has been designed in line with Local Plan Policy D1(o) which requires building services to be carefully integrated into building design.

Facades and materiality

- 9.45 Pages 144-147 of RSHP's DAS demonstrate how the proposed façade materiality has been developed to reflect the existing British Library facades whilst sensitively responding to the rich materiality of the surrounding area, including St Pancras, Somers Town buildings and the FCI. The proposed material palette is set out at page 146.
- 9.46 The rhythm and grain of the façades of the proposed building are also demonstrated to respond to the materiality and architecture of the original building (DAS, pages 42-44), as well as those of buildings in the Site's immediately surrounding area (DAS, page 147).
- 9.47 Sustainability has led the design decisions at the Site and the façades are no different. The proposed facades would follow 'fabric first' principles to manage the solar gain limit. The strategy for the upper floor facades is shown in greater detail on pages 162-163 of the DAS.
- At a lower level, the use of timber has been introduced internally to give the building a human feel. Timber also supports wellbeing and sustainability aspirations of the project whilst also reflecting a material that is used extensively throughout the existing British Library building. Should timber not be possible to use externally due to fire regulations, an aluminium alternative is proposed which would be commensurate in tone and appearance to the timber to be used internally. The facades at this level are also curving in the public realm, offering interest and showing that the building is civic in nature and function. The ground floor along the northern elevation would be activated through its use for retail. The DRP comments, dated 21 May 2021, supported the introduction of the retail pods stating that they would be 'attractive forms' in this location.



Further details of all the proposed façades within the Proposed Development are included in the DAS (pages 148-163). The DRP supported the overall materiality proposed, stating that it introduced a 'distinctive character' to the building, the use of timber 'works well' and was a 'strong approach' to materiality at the Site. The panel requested further details on the proposed materials for the façade including aluminium and the structural design. Details of which have been included in the DAS at page 146.

Public Realm and CR2 Infrastructure

- 9.49 The design has been developed to ensure that the CR2 infrastructure required can be sub-terrain.

 This has allowed the creation of significantly improved external public realm at the Site.
- 9.50 The public realm design is described in the Public Realm and Landscape Design Statement, prepared by DSDHA and assessed in greater detail in Section 11 of this Statement. In line with Local Plan Policy D1 (k) the public realm has been designed following a detailed study of the surrounding street and open spaces network and in close consultation with the local community to ensure that the new public open space seamlessly integrates into its context.
- 9.51 The design team undertook a detailed engineering and design exercise in consultation with TfL to place the required CR2 ventilation infrastructure horizontally at basement level, and in doing so, has helped prevent the Site being potentially blighted by CR2 infrastructure vents. This has allowed the team to design excellent quality public realm in an area where this would otherwise have not been possible to deliver.

Lighting and Accessibility

- 9.52 The Access Statement prepared by Arup, sets out the inclusive design goals. The statement demonstrates that the Proposed Development considers inclusive access and provides a range of options to cater for a variety of users. The paths in the public realm have gentle gradients and would be easily navigable by use of a specific material and colour palette. Lighting would be used to illuminate surfaces and objects and signage, include Braille, would also be incorporated. Outdoor seating would also be provided in the public realm.
- 9.53 The Lighting Strategy prepared by Arup sets out the project aspirations and proposals for the public realm lighting. The lighting strategy for the proposed development is to create an environment after dark that puts people and the local community at the heart of the development. The approach to the external lighting design focuses on the quality of the overall experience for all users of the



spaces; with careful integration of light within the building, as well as hard and soft landscaping. Lighting would be used to reinforce key routes, create a relaxing space and calming atmosphere in paths for wandering and meandering. Dwell areas would feature focused lighting to encourage visitors to rest and enjoy spaces. Community activity areas would feature lighting infrastructure to enable provision of lighting for defined activities.

Secured by Design

- 9.54 The British Library's security requirements as one of the nation's most important institutions have been incorporated into the design, enabling a flexible approach towards security as informed by the prevailing national threat level and other advice received from Government agencies. Seeking at all times to maximise public access to the Library, retractable screens have been incorporated into the design of the British Library Foyer at ground floor level which can deployed as appropriate to manage access to some areas whilst leaving others, such as the foyer itself, fully accessible to the public. The security screens would allow the British Library foyer to operate at different times to the wider British Library. This security approach has been discussed and agreed with LB Camden planning and design officers.
- 9.55 The design has also been developed in close consultation with the British Library security team and the Metropolitan Police. The Crime Impact Statement, prepared by Arup (page 247 of the DAS), sets out the measures that are proposed within the design to reduce opportunities for crime and promote security and safety for the users of the Proposed Development, in line with Policy D1(i). These include measures such as, but not limited to, hostile vehicle mitigation, robust and resilient structure, video surveillance system.

Interim Conclusion

- 9.56 The proposals have been designed having regard to national, regional and local planning policy.
- 9.57 The Site offers a unique opportunity to deliver a landmark building of exceptional and sustainable design which would sit comfortably in its historic context. The existing Site is underutilised despite its strategic location opposite St Pancras Station and at the heart of the KQ between the established KQ institutions of the British Library and the FCI. The Proposed Development is therefore a significant opportunity for a well-designed and high-quality mixed-use development that would set a new benchmark for sustainable design, construction and operation.



- 9.58 The proposed building has a bespoke design which enable it to host an extension to the nation's library, whilst also delivering essential CR2 infrastructure and making a substantial contribution towards lab-enabled floorspace to the heart of the KQ, meeting three strategic priorities for the UK, London and LB Camden.
- 9.59 The design of the Proposed Development has been through a thorough design consultation process with input from interested stakeholders including the local community, the LB Camden planning, design and conservation officers, the GLA, HE and LB Camden's DRP. Where possible, comments received have been incorporated into the final design and have led to improvements to the scheme's design.
- 9.60 Sustainability considerations have led the design process. Arup have input into the scheme design since the initial design stages and throughout the pre-application process to ensure that the proposed building would have exemplary sustainability credentials.
- 9.61 The building has been designed to meet the needs of the KQ and life science occupiers and as such it would support and contribute to the success of the KQID in the future. The British Library would receive a significant quantum of new floorspace which has been designed to help the library fulfil the needs of their 'Living Knowledge' initiative and would also ensure that the UK's national library is truly open and welcoming to the local community.
- 9.62 Overall, it is considered that the proposed building is one of exemplary design which would deliver a truly public building which is a landmark for the area whilst sensitively respecting its setting within the curtilage of the Grade I British Library and other nearby Grade I and Grade II listed buildings and conservation areas. A comprehensive Design and Access Statement has been submitted with the application which assesses the proposals, provides detailed design justification and illustrates how the design evolved during the project, through consultation with LB Camden, HE, the GLA, the local community and other key stakeholders and ultimately how the design of the building has been informed by both its historic context and by sustainability principles.



10 Heritage, Townscape and Views

- 10.1 This section considers the Proposed Development against relevant national, regional and local heritage planning policy and guidance relating to designated heritage assets, archaeology and townscape. This section also considers the Proposed Development in respect of townscape views and effects on on heritage assets, notably the setting of the Grade I Listed St Pancras and King's Cross Stations, the former Midland Grand Hotel, the setting of Grade II listed Levita House, the setting of the King's Cross Conservation Area and LVMF View 6A.
- 10.2 A full analysis of the effects of the proposed development on designated heritage assets is included within the submitted Townscape, Visual and Built Heritage (off-site) Assessment ("TVBHA"), prepared by Tavernor Consultancy and the Heritage Impact Assessment prepared by Cordula Zeidler. These documents are submitted as part of the full planning and listed building consent application and should be read alongside this section of this Planning Statement.

Statutory Legislation

10.3 Section 66(1) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Historic England listing citation is included at Appendix B.

NPPF

- 10.4 Chapter 16 of the NPPF sets out the policies relating to the conservation and enhancement of the historic environment. At the outset, NPPF paragraph 189 specifies that: "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."
 - 10.5 NPPF 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."



- 10.6 NPPF paragraphs 200 and 201 provide a definition and the approach to harm. The policy at paragraph 200 is clear that: "any harm to, or loss of, the significance of a designated heritage asset ... should require clear and convincing justification".
- 10.7 NPPF paragraph 202 has regard to less than substantial harm. It states 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."
- The NPPG on Conserving and Enhancing the Historic Environment provides further guidance in assessing the impact of development proposals which effect heritage assets. It sets out that "Significance" derives not only from a heritage asset's physical presence, but also from its setting. It sets out that "Public Benefits" may follow from many developments and could be anything that delivers economic, social or environmental objectives as described at Paragraph 8 of the NPPF.

London Plan

- 10.9 London Plan Policy HC1 outlines that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Policy HC1 is clear that 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.
- 10.10 Policy HC3 of the London Plan advises that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of a specific view.
- 10.11 London Plan Policy D4 seeks to sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components and other features including distinctive buildings and historic heritage, through high quality design and urban management.
- 10.12 Policy D8 of the London Plan states that development proposals should address visual impacts, including an analysis through long-range, mid-range and immediate views from the surrounding streets; architectural quality and materiality of an exemplary standard and consider nearby heritage assets and their settings.



- 10.13 Policy D9 states that the boroughs should create area specific definitions of a tall building and that the development of tall buildings should only take place within areas that have been defined as acceptable for tall building by local development plans.
- 10.14 LVMF View 6A, to which part of the Site falls within, states that the panorama is sensitive to large-scale development in the foreground and middle ground. The LVMF sets out that there is considerable opportunity, however, to introduce new development if it is sympathetic to the composition and character of the view.

Camden Local Plan

- 10.15 Policy D2 of the Local Plan states that the Council will preserve and where appropriate, enhance LB Camden's rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.
- 10.16 In respect of archaeology, the policy states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.
- 10.17 The King's Cross Conservation Area Statement was issued in 2004 and describes the history, character and appearance of the conservation area.

Heritage - Assessment

- 10.18 The application Site does not lie within a conservation area but is within close proximity to the King's Cross St Pancras Conservation Area. The Site is also located close to a number of listed buildings, including several Grade I listed buildings such as the British Library, King's Cross Station, St Pancras Station and the former Midland Grand Hotel. A number of Grade II listed buildings also surround the Site, including the Great Northern Hotel, Camden Town Hall, Levita House and Chamberlain House
- 10.19 A Heritage Impact Assessment, prepared by Cordula Zeidler Heritage Consultancy, has been submitted with this application. The Heritage Impact Assessment assesses the impact of the



proposed development on the special interest of the British Library and its setting, as well as the unlisted BLCC building.

10.20 Throughout the pre-application period the proposed design has been developed in consultation with Historic England (HE). On 22 July 2021 HE issued their formal pre-application feedback (ref: PA00535825) which stated that the Proposed Development would cause 'a low degree of less than substantial harm' to the significance of the Grade I listed Library and the setting of other heritage assets in the area. On 5 October 2021 the BLCC received a Certificate of Immunity from Listing.

Significance of the British Library

10.21 The British Library is of high significance as the national library, designed by a well-respected firm of post-war architects whose main work it is. The BL is a building which has memorable, carefully detailed and beautifully executed public areas which are amongst the best modern public interiors in the country, including particularly its main foyer and reading rooms. Its external envelope is also of high significance. The listing description expressly excludes back of house areas and the BLCC.

Impact of the extension on the setting of the British Library

- 10.22 The Heritage Impact Assessment outlines that the impact on the setting of the British Library would be beneficial. At present, the Site to the north of the British Library is largely vacant and has been awaiting development since the British Library opened. The Grade I listed building is poorly served by the empty Site which was not intended to be left undeveloped. The Site has been built up since the mid-18th century with housing and later with a goods yard. Further continuous accommodation for the Library was also designed for this Site, and once the Library opened on a reduced footprint, the vacant Site was marked as 'land intended for extension'.
- 10.23 In architectural terms, great care has been taken to relate the new building to the British Library. The forms of the elevations are different, but the material and proportions resonate with the British Library and St Pancras, in particular the proposed colouration which matches the Library's bricks and metalwork. The sloping roof forms to the south are designed to be recessive in form and expression and are inspired by the architecture of Alvar Aalto whose buildings were a major influence on Sir Colin Alexander St John Wilson's work the lead architect for the British Library. For all these reasons, namely the careful modelling of the building's height, building lines,



elevational treatment and materials, the Heritage Impact Assessment finds that the Proposed Development would enhance the setting of the Grade I listed British Library building.

Impact of the BLCC Relocation

- 10.24 The Heritage Impact Assessment considers that the proposed BLCC relocation would substantially preserve the special interest of the listed Library building. It would conceal but not remove the north elevation of the Library's west wing and appear as a sympathetic addition in largely matching materials, including red brick and street columns. It would necessitate the demolition or alteration of small areas of localised original fabric.
- 10.25 The removal and alteration of localised elements is considered to have a small impact on the significance of the listed building, the Heritage Impact Assessment finds that this impact would cause a small degree of harm at the low end of the less than substantial spectrum. However, this harm is set against the benefit of being able to construct additional facilities for the British Library which is predicated on the removal of the 2007 BLCC and its re-provision in this new location.

Impact of the demolition of the BLCC

10.26 The BLCC building is not listed and is not on LB Camden's local list. The Heritage Impact Assessment acknowledges that it has some local interest as a work by MJ Long and Rolfe Kentish who were both involved in the design of the British Library, and it houses functioning spaces that have served the conservation centre and sound archive. It is considered that the building can therefore be seen as a non-designated heritage asset of some limited local interest, and its loss, causing less than substantial harm, therefore has to be weighed in the balance of the proposals and against the public benefits they provide.

Impact of the Level 1 Terrace proposals

- 10.27 The proposals would result in a further remodelling of the Level 1 terrace which adjoins the former staff café and which was enlarged and altered in 2007 when the BLCC was built. The proposals would cause no harm to the Level 1 courtyard and would enhance this space and allow for a well-designed connection between the Library and extension, and this is a benefit.
- 10.28 The Heritage Statement considers that the removal of a section of metal trellis, originally designed to screen the terrace from the loading bay beneath but already truncated in 2007 when the terrace was extended to the north, would cause a low level of less than substantial harm, as



would the removal of a small section of north elevation and of the east-facing return of the adjoining stair tower to enable the new link. The Heritage Impact Assessment finds that the proposed heightening of the eastern brick wall, and the inclusion of small windows in that wall to allow for glimpses of St. Pancras sit well in their context and cause no harm.

Impact of the proposed interior links to the British Library

- 10.29 The proposed interventions are small in scale and necessary to connect the British Library and the new building. They concern two areas of high significance, namely two internal north walls in the public part of the west wing. Because of this great sensitivity, the interventions have been designed with care, and they are considered appropriate. They would result in the relocation of original fabric, including the stamp collection and Von Thunen bust to the immediate corridor extension. The Panizzi bust would be relocated following determination by the Library's curator team, and it is not listed.
- 10.30 The treatment of the extended corridor through unlisted back of house spaces is well-handled, with similar but slightly simplified finishes to those in the British Library's main adjoining public areas and sits comfortably adjacent to the public British Library spaces. Therefore, it is considered that no harm would be caused by these proposals.

Impact of Crossrail 2

10.31 The Heritage Impact Assessment concludes that there would be no harmful impact on the setting of the British Library caused by the CR2 structures.

Townscape and Views – Assessment

- 10.32 The views of the scheme have been thoroughly assessed within the TVBHA, prepared by Tavernor Consultancy. As part of the pre-application discussions, HE and LB Camden officers were consulted on the views of the scheme. The list of views tested in the submission have been agreed with both parties and comments on the appearance of the proposed building in views from both HE and LB Camden have been responded to in the design of the building.
- 10.33 Changes made following the consultation with HE and LB Camden include: (i) amending the location of rooftop plant; (ii) reducing the heights of stair cores to the eastern end of the proposed building such that the visibility of both elements were minimised in long distant views



over the Barlow shed at St Pancras Station; and (iii) shifting the building to the east, setting it back from Ossulston Street.

- The Heritage Impact Assessment confirms that the proposed new building has been skilfully modelled so that it sits comfortably behind the British Library and preserves important views of the listed building. The Proposed Development has also been designed to follow the geometry and colour palate of the existing British Library and sit comfortably alongside the Grade I listed building. The richly articulated gable ends of the Proposed Development with vertical stair towers at the east and west ends of the Proposed Development would create distinctive markers for the new northern entrances to the British Library which would enhance the legibility of the extended British Library. This is demonstrated in the verified views shown in the TVBHA. The most important views of the Library from the south across its forecourt are largely unchanged; the new building is substantially concealed, and only the uppermost part of its southern wing appears above the British Library, but sits lower than the clock tower and the west wing.
- 10.35 In views from Ossulston Street and Midland Road the TVBHA finds that the British Library retains primacy because the new building is set back from the street, and in views from the north the BL is considerably less prominent and already much concealed, and the extension causes no harm to its setting.
- 10.36 In local views, where the Proposed Development is visible, Tavernor Consultancy consider that its scale and form would be appreciated as part of the contrasting large-scale townscape to the east. Furthermore, it is considered that and the legibility of the Proposed Development as an extension to a public and civic building of national importance and part of a nationally important focal point within Central London is appropriate.
- 10.37 In terms of the settings of other listed buildings, Tavernor Consultancy's TVBHA (pages 112-117 and Table 7.6) demonstrates that the Proposed Development would have no effect on the significance of St Pancras Station and the former Midland Road Hotel or Kings Cross with no magnitude of impact.
- 10.38 Paragraph 9.5 of the TVBHA states that the completed Proposed Development would have negligible to minor effects on designated LVMF views, as set out in Table 9.1 of the TVBHA.



10.39 In terms of the surrounding conservation areas the TVBHA demonstrates that the Proposed Development would have no effects, including cumulative effects, on either the Kings Cross or the Bloomsbury Conservation Areas.

Pre-Application Feedback

- 10.40 Historic England's formal pre-application feedback (dated 22 July 2021) stated that, in terms of local townscape views, the proposed development would have a 'relatively low impact'. In the most significant views originating from Euston Road and the existing Library piazza, HE considered that the proposed development 'is unlikely to compete with, or distract from, the existing form or outline of the Library'. HE considers that in wider townscape views, the proposals are 'unlikely to impact on the most significant views' of St Pancras and King's Cross. The feedback confirms that the distinctive rooftop silhouettes of the stations are also 'unimpacted by backdrop development'.
- 10.41 In less-significant views of the stations, specifically those originating from Gray's Inn Road and east on Pentonville Road, HE has assessed that, as the proposed extension would be seen in the backdrop setting to the roof tops of the stations, thereby making it more difficult to discern the silhouettes of the buildings, the proposals cause a low degree of less than substantial harm to the setting of the stations in those views.

Interim Conclusion

- 10.42 Tavernor Consultancy have found that the majority of the context townscape and visual effects of the completed Proposed Development would not be significant. There would be no significant effects on LVMF views or designated borough views. While there would be visual impacts on the settings of designated heritage assets there would be no resulting significant effects on the ability to appreciate their heritage significance.
- 10.43 It is considered that the Proposed Development would have significant localised townscape and visual effects on adjacent streets and some limited beneficial effects further from the Site where streets and spaces align with the Proposed Development. Any potential adverse townscape or visual effects of the Proposed Development when completed have been mitigated during the iterative design development process prior to submission and all significant effects of the completed Proposed Development would be beneficial or neutral in nature. Cumulative schemes



would not increase the effects in comparison to the Proposed Development considered in isolation.

Conclusion

- 10.44 Where less than substantial harm has been identified, it is clear that the substantial public benefits to be delivered as a result of the Proposed Development including an extension to the UK's national library, delivery of essential CR2 infrastructure to a safeguarded site and the creation of a significant quantum of commercial, including lab-enabled floorspace to the heart of the KQ, which together deliver significant public benefits nationally, regionally and locally, clearly outweigh this harm.
- 10.45 It has been found that the proposals accord with both national and LB Camden planning policy whilst also meeting the tests of Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.



11 Landscape and Public Realm

11.1 This section assesses the proposals in terms of landscape and external public realm proposed at the Site.

Planning Policy

- 11.2 London Plan Policy D8 sets out the characteristics that new public realm designs should meet.
- 11.3 Policy G5 of the London Plan sets a new requirement for major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature based-sustainable change. The policy advises boroughs to set their own urban greening scores but advise 0.3 for predominantly commercial developments. The policy sets out how this score is calculated.
- 11.4 Policy G8 outlines that Boroughs should protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments.
- 11.5 In terms of draft GLA guidance, the Public London Charter, which sets out eight objectives for both internal and external public realm in London, has been considered and assessed as part of the proposed design for the public realm.

Camden Local Plan

- At a local level, LB Camden Local Plan Policy A2 Open Space seeks to protect and enhance access to open space and green infrastructure within the borough. Policy A2 (part m) states that new development proposals within the London Borough of Camden will be required to apply a standard of 0.74 sqm per occupant for commercial developments while taking into account any funding for open spaces through the Community Infrastructure Levy.
- 11.7 The supporting text to Local Plan Policy A2 (paragraph 6.49)f, specifically references the use of financial contributions to create useable spaces such as widening of pavements as it is identified that this can often be a challenge in densely developed areas.



- 11.8 Policy D1 states that the Council will only permit development for artworks where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.
- 11.9 LB Camden's Planning Guidance Note on Public Open Space (Jan 2021) provides further guidance and outlines the Council's expectation for the provision of new open space, including play facilities, to provide for equality of access.
- 11.10 LB Camden's Planning Guidance Note on Biodiversity (March 2018) also provides further guidance and advises that proposals must demonstrate how biodiversity considerations have been incorporated into the development.

Draft Site Allocation Local Plan

- 11.11 Draft Policy KQ1 (h) states that major developments in the KQ should contribute towards the provision of public realm enhancements and transportation improvements including transforming pedestrian and cyclist movement within the Euston Road corridor.
- 11.12 Draft Site Allocation Policy IDS 19 states that development must maximise opportunities for integrating green infrastructure into the fabric of the development. A range of inclusive, easily-accessible public open and green spaces that provide opportunities for everyone to relax, reflect and play should be included. Consideration should be given to how roof spaces can support this role and provide a public asset.
- 11.13 Supporting text at paragraph 10.186 of Policy IDS 19, advises that it is important that development proposals at the application Site embrace the Site's prominent and internationally significant location and use the surrounding historic context to help create a development of exceptional design quality that combines innovative architectural approaches with welcoming and inclusive open spaces, informal play opportunities and a high-quality public realm.
- 11.14 Paragraph 10.186 goes on to add that development should be responsive to each of the different urban conditions on its public boundaries. Development should also use green infrastructure measures to promote the essential value of the natural environment and its role in prosperity, health and wellbeing.



Assessment

- 11.15 The full details of the landscape and external public realm strategy are presented in the Public Realm and Landscape Design Statement, prepared by DSDHA and submitted in support of the Planning and Listed Building Consent application.
- 11.16 The public realm strategy builds on existing connections through and around the Library. The landscape-led design for the public realm defines a series of character areas in the public realm, both existing and proposed, that would respond to environmental and social requirements throughout the various phases of the development. The strategy also includes consideration for existing external public realm spaces such as the British Library Piazza.
- 11.17 The Site lies in an area which has limited access to public open space. There is 5,081 sqm of open space on Site as existing. This has been made publicly accessible through the installation of the temporarily Story Garden (4,113 sqm). Were the Story Garden to be removed, and without the Proposed Development, this area would return to inaccessible open space.
- 11.18 In order to develop their designs for the landscaping and external public realm, DSDHA undertook a detailed research exercise to understand how the public i) perceive and use the British Library, ii) move around the British Library, and iii) move through the Site and the surrounding area.
- Sustainability has also been a key consideration in the proposed design of the landscape and public realm. The proposed location of different uses has been considered in response to the microclimate of the Site and features including a water garden and maximising opportunities for greening have driven design decisions.
- 11.20 The form of the landscape has been developed in consultation with the local community. The Community Garden proposed to the west of the Site directly off Ossulston Street would deliver a space where the local community can co-design and co-manage with the Applicants. It is anticipated that the detailed design would be subject to a planning condition.
- 11.21 On a micro-level DSDHA have conceived three 'character areas'. These are: (i) the British Library entrance square off Midland Road, (ii) the areas to the south of Dangoor Walk, and (iii) the public space off Ossulston Street.



(i) Midland Road Entrance Square

- 11.22 The landscape design of the Midland Road entrance areas has been developed to create a welcoming and legible new front door to the British Library Extension and provide good accessibility, way finding and orientation.
- 11.23 To the south of this area adjacent to the loading bay raised planters are proposed which provide a green edge to the pavement and create a dedicated short stay cycle area behind it. The landscaping proposal for the entrance to the loading bay has been carefully designed to ensure high quality form and function.
- 11.24 Toward the north-eastern edge of the Site, a number of activity cells are proposed which provide pockets of greening and seating areas. The planter cells have been arranged to take in the established 'desire line' routes from St. Pancras Station.
- 11.25 A disabled drop off bay is located along Midland Road which provides a direct route to the main entrance. There is also a wider ambition, as part of a separate, future project, to introduce additional planters along Midland Road which would extend beyond the Site boundary and in front of the FCI as a shared piece of public realm. The principle of this has been discussed with the FCI, who are supportive in principle.

(ii) The areas to the south of Dangoor Walk

- 11.26 The design concept for this area derives from organic 'cells'. This is considered appropriate given the Site's location at the heart of the KQ. The cell concept is translated into the retail units on the ground floor both internally and externally delivering a coherent and integrated public realm.
- 11.27 Within the external public realm at ground floor a series of 'activity cells' are proposed to be set within a range of paths. The paths have been designed to have a gentle gradient and be easily navigable, whilst also providing routes across the Site that are accessible 24/7. The cells would facilitate a range of uses and programmes to make a unique landscape environment that is accessible and inviting. This area would also provide opportunities for informal play space for children to play and learn about the environment (see Section 6.8 of the Public Realm and Landscape Statement).



11.28 The proposed landscaping would play an important role in knitting the immediately surrounding area with the British Library and would also be crucial in linking St Pancras and Kings Cross with Euston. The proposed design responds to the requirements of draft Policy KQ1(h) by providing a range of routes through the Site which would connect to Euston whilst also delivering short-stay cycle parking spaces across the Site. This is shown in detail in Section 7 of the Public Realm and Landscape Statement.

(iii) Ossulston Street Entrance and Community Gardens

11.29 Space has been reserved on the Site for a new community garden to be delivered as part of the Proposed Development. This area has been designed in consultation with the local community. The landscape and planting design responds to the microclimate, Site conditions and would aid wayfinding through the spaces. On the Ossulston Street boundary, a planted 'buffer' is proposed, within which the new Community Gardens are located. This planted zone includes a Raingarden, which acts as a SUDS drainage measure, and contributes to the overall play strategy for the Site. Extensive tree planting in this area provides some shading to the Community Garden in summer. The design team would continue to collaborate to ensure that the community co-design process complements the other key roles played by the landscaping design at the Site, including SUDS and wind mitigation.

British Library Level 1 Courtyard

- 11.30 This proposed terrace space is an extension of the existing British Library outdoor space, which is currently used by the *Courtyard* Restaurant, British Library staff and Events Teams.
- 11.31 The courtyard landscape design has been developed in response to the microclimate of the Site as well as the architecture of the existing building and the new extension. The layout of the paving and planting in the space has been arranged in response to the brief provided by British Library to provide a flexible space that can accommodate a range of events and activities within the courtyard.
- 11.32 Two activity cells are proposed within the courtyard which would provide greenery and seating. The activity cells are arranged so that the courtyard space can accommodate events as well as being a circulation space, allowing for movement between different parts of the British Library buildings.



- 11.33 The proposed planters have been designed to provide places to sit and dwell, with their forms aiming to respond to the facade of the new extension.
- 11.34 Stone paving is proposed to the courtyard ground surface in general, similar to the ground floor public spaces. These areas of hard paving would allow building uses to spill out into the courtyard and provide animation. As the terrace is located within close proximity of the new library spaces that the local community and general public can use within the new extension, the hard landscaped open spaces provide spill out space for community space and evening activities.
- 11.35 The existing sculpture, Oval Form (Trezion) by Barbara Hepworth which stands in the terrace currently would be retained and carefully repositioned within the new landscaped space to ensure its artistic value and historical significance can be appreciated.

Playspace and Public Art

- 11.36 In response to Local Plan Policy A2 (p) the public realm would provide an informal and immersive recreational experience for children to play and learn about the environment. DSDHA have proposed an integrated approach to providing playspace where playful elements have been introduced into the landscape such as: playful topography, undulating planter edges and trails through planting. These would encourage children to interact and play.
- 11.37 The landscaping and public realm also offers the opportunity for the provision of public art. The submitted Public Realm and Landscape Statement identifies several potential locations where public art could be installed at the Site. Public art in these locations would create contribute to the creation of an engaging and education environment whilst also aiding wayfinding, in line with LB Camden Local Plan Policy D1.
- 11.38 Furniture and planting schedules have been provided within the submitted Public Realm and Landscape Statement. The furnishings proposed have been chosen to provide quieter dwelling spaces in the public realm and seeks to ensure that the public realm feels decluttered. The planting has been designed in collaboration with Arup's Ecology team and a proposed planting schedule is included within the submitted report.



Lighting

11.39 The lighting scheme within the public realm parallel to Dangoor Walk (see Section 6.0 of the Public Realm and Landscape Report) has been designed by Arup to create a safe and inclusive environment throughout the day and night-time. Key considerations in the design have been: safety, identity, legibility and movement. The proposed lighting has been carefully considered to ensure that no harm is caused to ecology at the Site.

Security

11.40 The proposed landscape designs to the public realm parallel to Dangoor Walk has been designed with particular regard to security. Section 6.9 of the Public Realm and Landscape Design Statement and the Security Statement (page 247 of the DAS), prepared by Arup set out the proposed measures which would be designed into the public realm.

Cycling

- 11.41 Routes encourage active modes of travel and have been designed through the Site to improve permeability and access to the short and long stay cycle parking areas, while creating clear and safe routes which are legible alongside pedestrian and vehicular movement.
- 11.42 The public realm and landscaping designs have been developed in line with the Mayor's draft Public London Charter. Page 22 of the Public Realm and Landscape Design Statement clearly demonstrates how each of the eight objectives of the Charter have been used to provide guiding principles for the landscape and public realm design.
- 11.43 In direct response to LB Camden Local Plan Policy A2, the proposed development would deliver 7,051 sqm of amenity space. Based on 3,110 jobs created, this represents an overprovision of 4,749.6 sqm, which is considered a significant public benefit of the scheme.
- 11.44 Therefore it is clear that, in line with planning policies at national, strategic and local level, the development would deliver a significant quantum of high quality public realm (7,051 sqm) which is an increase of 1,970 sqm on the existing provision. The proposed publicly accessible open space has been designed to meet the needs and requirements of the local community and also to deliver civic spaces befitting of a national institution, the British Library.



Interim Conclusion

- 11.45 Informed by a detailed analysis of the Site, the public realm strategy would unlock the existing, impermeable Site, opening up the space for public use whilst enhancing existing routes and creating new connections between the British Library, King's Cross, St Pancras and Euston Stations, as well as the neighbouring context of Somers Town. The public realm strategy promotes active travel, healthier journeys and greater permeability. Sustainability, safety, security, accessibility and the environment have also been key considerations in the development of the design which has been developed following close consultation with the local community and LB Camden planning, open space and design officers.
- 11.46 It is therefore considered that the proposed landscaping is in line with relevant planning policy at all levels.



12 Energy and Sustainability

12.1 This section assesses the proposals in terms of energy and sustainability.

Planning Policy

- 12.2 NPPF paragraph 20 encourages strategic polices to consider the conservation of the natural, built and historic environment including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation.
- 12.3 NPPF paragraph 119 encourages development that makes as much use as possible of previously developed or 'brownfield' land.
- 12.4 NPPF Chapter 14 sets out how planning policies should meet the challenge of climate change, flooding and coastal change.
- 12.5 NPPF Paragraph 152 sets out that planning policy should consider a low carbon future in a changing climate. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.

London Plan

- 12.6 In accordance with National objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 12.7 London Policy SI2 relates to minimising greenhouse gas emissions and states that major development should be net-zero carbon which means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy as set out:
 - i. be lean: use less energy and manage demand during operation



- ii. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
- iii. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
- iv. be seen: monitor, verify and report on energy performance
- 12.8 Part C of the above policy states the requirement for a minimum on-site reduction of 35% beyond building regulations for major developments and that major commercial developments should achieve 15% through energy efficiency measures. Any shortfall should either be provided by a payment in lieu or off-site. Part F of the policy states the requirement for referable development to calculate the whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment.
- 12.9 London Plan Policy SI13 seeks to achieve greenfield run-off rates and ensure surface water run-off is managed as close to its source as possible within developments.
- 12.10 The London Plan Policy SI4 states development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- 12.11 The London Plan Policy S17 states that referable applications should promote circular economy outcomes and aim to be net-zero waste. A Circular Economy Statement is required to be submitted to demonstrate the aims set out –n parts i vi of the policy.
- 12.12 London Plan Policy G5 states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage.
- 12.13 London Plan Policy G8 places an expectation on boroughs to protect existing allotments and encourage provision of space for urban agriculture, including community garden, and food growing within new developments.
- 12.14 In regard to flood risk management and sustainable drainage, Policies SI12 and SI13 of the London Plan include the requirement to follow a hierarchical approach to surface water



management with a preference for green over grey features and advocate that drainage should be designed and implemented in ways that promote multiple benefits including increase water use efficiency, improve water quality, and enhance biodiversity, urban greening, amenity and recreation.

Camden Local Plan

- 12.15 At a local level, through Local Plan Policy CC1, LB Camden requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan. The policy clearly requires all proposals for substantial demolition to demonstrate that it is not possible to retain the existing building.
- 12.16 In support of these objectives LB Camden requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.
- 12.17 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures.
- 12.18 Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments.
- 12.19 In January 2021 LB Camden updated the Camden Planning Guidance (CPG) 'Energy Efficiency and Adaptation' to ensure that the Council's commitment to reducing carbon emissions is achieved. This document includes a cascade regarding the demolition of existing buildings and whole life carbon cycles.
- 12.20 LB Camden Planning Guidance 'Water and Flooding' (March 2019) also gives further guidance in respect of the water environment in LB Camden, water efficiency and flooding.

Emerging Policy

12.21 Emerging Site Allocation Policy IDS19(f) requires development at the Site to maximise opportunities for integrating green infrastructure into the fabric of the development.



Assessment

- 12.22 An Energy Statement and a Sustainability Statement (including a BREEAM Assessment), both prepared by Arup, have been submitted in support of this application.
- 12.23 The United Nations' Sustainable Development Goals have been used as a framework to identify the areas where the project could contribute towards sustainable outcomes. The sustainability targets for the project were set at an early stage of the design development and have since informed all key design and operational decisions made on the project. The targets are set around six key objectives. These are:
 - i. Partnerships to magnify outcomes;
 - ii. Creating an inclusive place;
 - iii. Achieving pathways towards net zero carbon and future resilience;
 - iv. Supporting innovation and delivering employment;
 - v. Delivering biodiverse habitats; and
 - vi. Supporting the local community.
- 12.24 The key sustainability measures of the scheme include:
 - i. Improved building design which seeks to expand the employment of the building;
 - ii. BREEAM 'Excellent' rating for shell and core and aspiration towards 'Outstanding';
 - 50% improvement over baseline building water consumption, anticipated by water efficient measures and fittings;
 - iv. The Proposed Development would be all-electric and incorporate air source heat pumps into the scheme, which are considered a renewable resource in the CPG;
 - v. A whole life cycle carbon assessment has been undertaken in line with the London Plan Policy S12 to help the project team to understand the environmental impact of the building design operation. The scheme's impact has been compared with the benchmarks defined by the GLA with the ambition to meet the aspirational whole life carbon benchmarks;
 - vi. Ecological enhancements have been incorporated into the design to improve ecological resilience and to seek a biodiversity net gain for the Site. Additionally, the project achieves an Urban Greening Factor (UGF) of 0.25;



- vii. The design takes into account resilience against future climate change with adaptable infrastructure and management designed to protect from flooding and response to heat waves and water shortages; and
- viii. Compliance with the waste hierarchy throughout operations as set out in the Operational Waste Management Plan

Energy

- 12.25 A combination of innovative and best practice energy reduction measures have been applied to the Proposed Development. This has resulted in an overall reduction in regulated emissions of 39%. This is beyond the GLA's minimum 35% policy threshold via on-site measures.
- 12.26 In terms of the 'Be Lean' component, a range of energy-efficient passive design measures are proposed for the development:
 - An enhanced thermal envelope performance to reduce the heating and cooling load for the development;
 - High performing envelope air tightness which would lead to savings in the heating and cooling energy consumption throughout the year;
 - The use of daylighting which allows the potential to turn off the permitter lighting automatically; and
 - The use of Passive Solar Gain to offset the perimeter heat loss in winter.
- 12.27 To reduce embodied carbon the strategy for lab-enablement within the proposed building is adaptive rather than flexible. Laboratory use is enabled by the 4.11m floor to floor height but all other requirements are adaptive. The additional plant and fume extract required to make a lab operate can be added when tenancy usage is known.
- 12.28 The proposed building has been modelled on the assumption that 15% of each floor is operating at intensive laboratory usage. This would be supported by less intensive laboratory supporting areas with lower air and energy requirements and write up spaces. Should the occupation of the building change the quantum of labs against the 15% model assumed at submission stage, the model would be updated to reflect this (see Appendix A of the Energy Statement).



In relation to the 'Be Clean' element, the Proposed Development includes the use of high 12.29 efficiency heat pumps which is favourable over a connection to a common network. No provision has been made for a future connection to heating systems due to the scheme already including high efficiency, low carbon air source heat pumps. An internal connection route has been identified at the northeast of the Site for future connection to a district

cooling scheme if one is developed.

12.30 In regard to 'Be Green', heat pumps use of electricity, rather than gas, is proposed to take advantage of future decarbonisation of the national grid. This is of importance so that the building can meet the government aspiration for zero carbon buildings. . For these reasons, air source heat pumps have been incorporated into the space heating and cooling design throughout the commercial development. The Library has a preference for cooling towers,

but alternatives would be examined in more detail as the design progresses.

12.31 The savings for the Be Green stage in the energy hierarchy achieves an additional 8% saving from the previous stage. This falls short of LB Camden's 15% target for Be Green, however, as can be seen from the overall result, the proposed development has prioritised overall carbon savings through use of passive design features and taken a whole life carbon approach to reviewing effectiveness of proposals.

12.32 Table 1 of the Energy Report therefore outlines that regulated building emissions at each stage in the energy hierarchy following the London Plan methodology are summarised below:

Be lean: 31% saving

Be clean 0% saving

Be green: 8% saving

12.33 To satisfy the 'Be Seen' requirement under the London Plan, energy performance would be monitored post-construction and the building's systems subject to seasonal commissioning until optimal performance is maintained under automatic control and the building operator is confident to manage ongoing operation.



Whole Life-Cycle Carbon Assessment

- 12.34 In line with the requirements of LB Camden CPG 'Energy Efficiency and Adaptation' (2021) a Stage 2 Whole LifeCycle Carbon Assessment (WLCCA), including a Demolition Justification Report, has been prepared by Arup and submitted in support of this application. The WLCCA has been undertaken at an early stage in the design process, it therefore captures embodied carbon savings already achieved because of decisions taken by the design team. The WLCCA states that the project aspiration is to reduce embodied carbon by 40% and sets out opportunities for how embodied carbon can be reduced within the Proposed Development. This would be subject to detailed design.
- 12.35 The WLCCA demonstrates that 98% of materials would be diverted from landfill, in line with London Plan Policy SI 7.
- 12.36 The Demolition Justification Report, appended to the WCCLA, addresses the CPG hierarchy in the following way:
 - Refit: this option is not viable for the BLCC as a refit would not deliver the highquality internal conditions required to realise the conservation ambitions of the project, including insufficient internal daylighting levels.
 - ii. *Refurbish*: this option was considered (as demonstrated in the 'BLCC retention study'). Refurbishment was not considered viable because the BLCC prejudices the development of the wider site, given its prominent location.
 - iii. Substantial refurbishment and extension: this option has been considered by the team. As with the response to the 'refurbish' option, substantial refurbishment and extension were not considered viable because the BLCC prejudices the development of the wider site, given its prominent location. Furthermore, the design team have reviewed the possibility of extending the existing BLCC. It has been found that the relatively solid form of the BLCC and the sensitivity of the activities which take place inside do not lend themselves to being surrounded by publicly accessible circulation areas. The Demolition Justification Report sets out that, in effect, the BLCC acts as a 'bung' within the 'necking' formed by the rectilinear blocks of reading rooms located along the main street frontages. Although relatively small and low, the central location of the BLCC leaves narrow



- residual areas of the site available for development which would require commensurately denser commercial development around the site perimeter.
- iv. Reclaim and recycle: as a result of demonstrating that options i-iv are unfeasible at the Site, in line with the London Plan (2021) and LB Camden's Energy Efficiency and Adaptation CPG (2021) a pre-demolition audit of the BLCC has been undertaken by Keltbray. The pre-demolition audit has found that materials such as brick, acoustic boarding and carpet could be salvaged in good condition for reuse on or off-site. Items that hold a high recycling potential have also been identified and potential waste contractors have been identified to maximise their recycling potential.
- 12.37 As a result of the assessment set out in the Demolition Justification Report, the demolition of the BLCC, with commitment to maximise waste reclamation and recycling, is considered acceptable to ensure that the Proposed Development realises its ambitions and objectives to deliver greater social value and world-class library space and commercial, including labenabled, floorspace within a building of high-quality, sustainable architectural design.
- 12.38 The removal of the Story Garden from the Site has also been considered in the Demolition Justification Report. Arup have found that the removal of the Story Garden is predicted to have a negligible carbon impact given the Applicants' commitment to deliver a community garden within the Proposed Development.

BREEAM

- 12.39 A BREEAM UK New Construction 2018 (v3.0) assessment is being undertaken for the shell & core mixed-use British Library Extension proposals, which will assess the office, culture, laboratory and retail areas.
- 12.40 The Proposed Development is seeking to achieve a minimum 'Excellent' BREEAM rating with aspirations for an 'Outstanding' rating.
- 12.41 It is intended that this project would be assessed under the BREEAM Bespoke methodology, which would allow the list of applicable credits to be modified to reflect the unique nature of the development. As part of this process, an application would be submitted to the BRE along with specific details of the project to allow the bespoke list of criteria to be produced. This may result in alterations to the weightings of categories within the BREEAM New



Construction 2018 manual, therefore the exact target and potential percentage scores may vary slightly, however this would not impact the overall ratings.

Urban Greening Factor

- 12.42 The Site is anticipated to achieve an Urban Greening Factor of 0.25.
- 12.43 It is recognised that this falls below the London Plan target of 0.3. This shortfall is considered acceptable in this instance as it has been demonstrated that the greening has been maximised at the Site. This has been done through:
 - i. A long-term tree planting strategy which seeks to introduce ecological succession into the landscape; and
 - ii. A landscape and planting design which responds to the microclimate of the Site.
- 12.44 The Applicants would continue to actively seek and implement future opportunities to improve the UGF score as the design progresses.

Circular Economy

- 12.45 In line with London Plan Policy SI 7, a Circular Economy Statement prepared by Arup has been submitted with this application. The Circular Economy Statement outlines the circular economy measures that are being targeted within the Proposed Development. The targets are as follows:
 - Minimising the quantities of materials used;
 - Minimising the quantities of other resources used (energy, water, land);
 - Specifying and sourcing materials responsibly and sustainably;
 - Designing for reusability / recoverability / longevity / adaptability / flexibility;
 - Designing out construction, demolition, excavation, industrial and municipal waste arisings;
 - Demolition waste (how waste from demolition of the layers would be managed);
 - Excavation waste (how waste from excavation would be managed);
 - Construction waste (how waste arising from construction of the layers would be reused or recycled); and



 Municipal and industrial waste (how the design would support operational waste management).

Sustainable Urban Drainage

12.46 A Flood Risk Assessment (FRA) has been submitted with this application. The FRA concludes that the Site is at low risk of flooding from all sources. With the proposed SUDs and attenuation features, the development would not increase the risk of flooding at other sites. The proposal for surface water management aligns with the aims of the NPPF and demonstrates a sustainable approach consistent with current best practice.

Interim Conclusion

12.47 The proposed development would meet the local, regional and national planning policy requirements for energy and sustainability.



13 Transport, Waste and Servicing

Transport

Policy

- 13.1 Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives.
- 13.2 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. Furthermore paragraph 106 states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
- 13.3 Paragraph 110 of the NPPF states it should be ensured that: opportunities to promote sustainable transport modes have been taken, transport has safe and suitable access for all users and any significant impacts on the highway network have been assessed.
- 13.4 Paragraph 104 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
- 13.5 Paragraph 152 of the NPPF states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.

London Plan

- 13.6 London Plan Policy T4 assessing and mitigating transport impacts, requires that when required, transport assessments should be submitted with development proposals to fully assess impacts on transport networks.
- 13.7 London Plan Policy T5 (cycling) requires development proposals help to remove barriers to cycling and create healthy environments in which people choose to cycle. This can be achieved through the provision of cycle parking in accordance with the minimum standards.



13.8 London Plan Policy T6 (car parking) restricts car parking in line with levels of existing and future public transport accessibility and connectivity. Appropriate disabled persons parking for Blue Badge holders should however be provided, as under Policy T6.5.

Camden Local Plan

- 13.9 At a local level, LB Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this LB Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.
- 13.10 Policy T1 (h) states that LB Camden will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within LB Camden's Transport CPG (2021).
- 13.11 LB Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.
- 13.12 In January 2021 LB Camden adopted their 'Transport' CPG which provides information on all types of detailed transport issues within the borough.

<u>Assessment</u>

- 13.13 The following transport documents have been prepared by Arup in support of this application:
 - i. Transport Assessment;
 - ii. Car Parking Design and Management Plan;
 - iii. Construction Management Plan; and
 - iv. Delivery and Servicing Management Plan.
- 13.14 The transport proposals in regard to both the construction and operational side of the development are summarised in turn below.



Construction

13.15 This application is supported by a draft Construction Management Plan (CMP) prepared by RPM in line with LB Camden's CMP proforma. The draft CMP identifies and outlines measures to minimise construction impacts. A full CMP would be prepared in consultation with neighbours and submitted for approval from LB Camden following the receipt of planning permission.

Operational

- 13.16 This application is supported by a Transport Assessment and Car Parking Design and Management Plan prepared by Arup, which identifies and outlines the transport proposals once the development is operational.
- 13.17 The Assessment outlines the results of the multi-modal trip generation assessment for both employees and visitors of the Proposed Development. The table below summarises the daily user trip generation figures at both AM and PM peak hours for different modes of transport.

Trip Generation – User trips (employees and visitors)				
	AM Peak	PM Peak	Daily Total	
Walking	122	148	270	
Cycling	231	283	514	
Bus	361	484	845	
London Underground/ Overground	922	1,265	2,187	
National Rail	623	1,029	1,652	
Taxi	2	13	15	
Motorcycle, scooter or moped	28	37	65	
Car/ van driver	5	4	9	
Car/ van passenger	0	0	0	
Other	12	11	23	
Total	2,305	3,274	5,579	

Figures taken from Pages 56 and 57 of the Transport Assessment, prepared by Arup. Note numbers may not sum due to rounding.



- 13.18 The Transport Assessment also assesses the net transport impact of the Proposed Development on individual modes of transport based on the proposed trip generation figures outlined above. The Assessment considers the PM peak hour (17:00-18:00) as this is when the Proposed Development is forecast to generate the most hourly trips on a weekday, with an additional 3,078 two-way person trips across all modes of transport.
- 13.19 The Assessment concludes that in all cases, the forecast increases in trip generation can be accommodated within the existing transport network capacities.

Cycle Parking

13.20 The proposed development would result in the following secure cycle parking provision at basement level:

Туре	Existing	Proposed	Uplift
Long stay	110	1,112	+1,002
Short stay	126	172	+46
Total	236	1,284	+1,048

- 13.21 In terms of short stay cycle parking, the London Plan requires 172 spaces to be provided within the Proposed Development. As part of pre-application discussions, LB Camden planning and transport officers have indicated that the provision of 84 short-stay cycle parking spaces for short term visitors/public in association with 38 further spaces in the existing short-stay facility off the piazza is acceptable in principle. The remaining short-stay cycle parking requirement generated by the Proposed Development would be delivered off-site in the local area. It has not been possible to locate a greater number of short-stay cycle parking spaces on site for the following reasons:
 - i. providing all the required spaces on site compromised the landscape and reduced permeability through the site;



- ii. to keep those areas free of street furniture and clutter, and to reduce the number of people wheeling bikes through the pedestrian area, which might make these areas feel more crowded and congested; and
- iii. having bike stands located adjacent to Ossulston Street and Midland Road provides better security for the cycle spaces.
- 13.22 Areas which have been initially considered for the short-stay parking locations include the island on Midland Road. It is anticipated that a financial contribution for the delivery of these spaces would be agreed as part of the s106 agreement.
- 13.23 The long stay provision would be accessible to British Library employees and the employees of the commercial tenants within the Proposed Development. The long stay provision is compliant with London Plan standards. 5% of the long stay spaces (56 spaces) would be delivered in the form of Sheffield stands (for non-standard and larger cycles as well as less abled people) in line with TfL's London Cycle Design Standards (2016). 10% of the 111 spaces provided would be in the form of lockers for folding cycles and the remaining 945 spaces would be provided by two tier cycle stands. All the long-stay cycle parking spaces would be secure, lit and covered and access to the long-stay cycle store would be controlled. All long-stay cycle facilities would be provided with supporting facilities in compliance with London Plan standards.

Car Parking

- 13.24 The development would be car free in line with strategic and local planning policy, with the exception of five wheelchair-accessible car parking spaces (four maintenance spaces for employees of the British Library and one space for the employees of the new commercial floorspace), representing a significant reduction in the existing car parking spaces at the Site by 21 spaces. In addition to this, a parking space would also be provided for minibuses on Midland Road.
- 13.25 20% of parking spaces would be fitted with active charging facilities and 80% with passive provision to conform with the Camden Planning Guidance: Transport (2021) requirements.
- 13.26 A Car Parking Design Management Plan has been prepared by Arup and submitted with this application, which outlines the proposed car parking provision, its design and how it would be managed.



Travel Plan

- 13.27 In relation to pedestrian access, the Site is surrounded by a comprehensive network of footways and pedestrians would access the Site from multiple access points on Midland Road, Ossulston Street and Dangoor Walk.
- 13.28 The employees cycling would access the Site via a dedicated ramp (or via two lifts, which would also be provided) within the Proposed Development, which would facilitate access to the cycle store in the basement. A secure entry management system would be provided at the entrance to the cycle parking area.
- 13.29 The proposed vehicle access points are as follows:
 - 1) Access to a new private, off-street car park (which would provide spaces for three wheelchair-accessible car parking and two operational parking) from Ossulston Street;
 - Delivery, servicing and waste collection vehicles would access the service yard from Midland Road (which would provide two operational spaces in addition to five loading bays); and
 - 3) Access to a new private, off-street car park (which would provide two wheelchair-accessible car parking spaces and a single minibus bay) would be from the access road to the service yard from Midland Road.
- 13.30 To ensure equal and convenient access to the building in a flexible and adaptable manner, careful consideration has been given during the early design stages of the Proposed Development to ensure that the needs of a wide range of people, including those with sensory, cognitive and mobility impairments, and those in wheelchairs, are integrated into the scheme.
- 13.31 The following measures would be in place to ensure that those with mobility difficulties can access the Proposed Development:
 - The approaches to the building's main entrance and to the cyclist entrance would be step-free and free from obstructions;
 - ii. The entrance doors would have level thresholds;
 - iii. Passenger lifts would provide access to all floors; and



- iv. Suitable sanitary facilities would be provided for all possible users, including visitors.
- 13.32 The provision of a standalone drop off facility to be used for disabled visitors to the British Library would be provided within the curtilage of the Site on Midland Road.
- 13.33 The submitted Framework Travel Plan also details how the Travel Plan would be managed once the Site is operational. It is expected that the submission of a Full Travel Plan would be required via a section 106 agreement.
- 13.34 The submitted Framework Travel Plan ensures that the proposed development complies with planning policy at all levels in terms of travel planning.

Waste and Servicing

Policy

- 13.35 London Plan Policy S17 seeks to reduce waste and increase material reuse, recycling and reduction in waste. Developments should be designed to have separate collection of dry recyclables and food.
- 13.36 Policy T7 of the London Plan specifically deals with deliveries, servicing and construction.
- 13.37 Local Plan Policy T4 states that the council will promote the sustainable movement of goods and materials. Policy CC5 outlines that the Council will seek to make LB Camden a low waste borough, particularly by ensuring that developments include facilities for the storage and collection of waste and recycling.

Assessment

Servicing

13.38 A Delivery and Servicing Management Plan (DSMP) has been prepared by Arup and is submitted in support of this application. The DSMP has been produced to employ several initiatives to reduce the number of weekly deliveries and servicing trips within the Proposed Development. As a result, the DSMP outlines that all tenants would be required to implement the following measures to reduce vehicle trips and the impact of servicing on the local environment:



- Use a booking-in service to control the flow of vehicles, retime deliveries and for loading bay management;
- ii. Provide a consolidated waste collection service; and
- iii. Provide information to deliverers i.e. a delivery point assessment.
- 13.39 It is anticipated that the Proposed Development would require a total of 250 deliveries a day, with 19 deliveries occurring during peak hours (11am-12pm).
- 13.40 As part of the proposals, the existing delivery and servicing spaces and operations would be reconfigured and adjusted to provide a combined and efficient solution within the existing servicing bay.
- 13.41 To manage the assumed peak hour demand of 19 trips, it is proposed to provide a total of 5 loading bays with one of the loading bays for exclusive use by the British Library, likely to be as follows:
 - 2 No. 10m loading bays sized at 10m x 4m;
 - 1 No. 8m loading bay sized at 8m x 3.6m; and
 - 2 No. 6m loading bays sized at 6m x 3.6m
- 13.42 Following the redevelopment, it is also proposed to provide a total of an additional operational bays to accommodate predominantly for vehicles of contractors undertaking essential maintenance and other works at the British Library. They are as follows:
 - 2 No operational bays in the Ossulston Street parking area; and
 - 2 No. 6m operational bays in the service yard.
- 13.43 To accommodate service vehicles, cycle couriers and motorcycle couriers, it is proposed to provide a courier drop off area adjacent to the post room on Site. In addition, a dockmaster's office has been provided to oversee the operations in the service yard.
- 13.44 The DSMP also includes a swept path analysis which demonstrates that vehicles can independently manoeuvre into their respective loading bay within the service yard.
- 13.45 The assumed operating hours for the service yard occur over a minimum of 16 hours a day and up to 24 hours a day if this becomes necessary in the future. Deliveries would be managed by the facilities management (FM) team using a delivery management system. All



- delivery and servicing vehicles are registered on the system before they can enter the building. This would ensure all servicing vehicles are scheduled and prioritised accordingly.
- 13.46 To assist deliveries to the Proposed Development, suppliers and their logistics providers would be given a Delivery Point Assessment. This document would provide drivers with clear instructions on where and how to access the proposed development to avoid causing disruption to other road users and pedestrians.
- 13.47 Therefore, the DSMP confirms that the Proposed Development would comply with planning policy at all levels in terms of servicing and deliveries.

Waste

- 13.48 The DSMP, prepared by Arup sets out that, to consolidate waste collections into as few vehicles as possible, the Proposed Development would provide a communal waste room and waste collections will be arranged by the on-site Facilities Management (FM) team.
- 13.49 It is proposed that all users of the development would have their main waste streams collected daily with waste stores sized to hold two days' worth of waste. Special waste streams would be collected less frequently, and this is described in more detail below.
- 13.50 It is proposed that the British Library waste would be stored separately to the commercial (office/lab and retail) waste.
- 13.51 The waste from the proposed library floorspace would be stored and collected as per the existing waste strategy at the Site, which has a combined collection of plastic and metal waste. Plastic and metal waste from the proposed commercial floorspace would be collected and stored separately.
- 13.52 Bulky waste from the British Library, such as wood, metal and general waste currently stored in the waste skips on Site, would be stored then be collected when it is full. Based on the existing waste generation data the collection would take place approximately twice a month.
- 13.53 The British Library also has a requirement for exhibition waste which occurs when exhibitions are dismantled. This waste is mainly construction waste, and it is managed by the contractors who are appointed to dismantle the exhibition. The current procedure for this is for a waste collection vehicle to spend half a day to a full day in the loading bay being filled with the waste



from the exhibition before this is removed. The capacity of the loading bay allows for this to occur when an exhibition is dismantled.

- 13.54 The Proposed Development may also generate some specialist waste, such as waste chemicals from the BLCC. It is worth noting that the BLCC waste chemicals are an existing waste stream at the Site. This waste is usually stored within the BLCC until the waste collection vehicle arrives and the waste is brought out for collection. The laboratories would generate specialist waste streams which may include chemical waste, solvent waste, clinical waste and radioactive waste. Radioactive waste would be stored within the laboratory itself. A small chemical waste store and a clinical waste store would be provided in the communal areas at the Proposed Development. When the bins are full the tenant would contact their appointed, specialist radioactive waste contractor to arrange an ad-hoc collection. The waste operative would park in the operational bays before directly collecting the waste from the laboratory, transporting it through the back of house corridors and goods lifts and then remove it from site.
- 13.55 Within the building, it is proposed that waste would be stored at recycling points distributed throughout each floor. Waste streams would be segregated using colour-coded sacks and will be taken by each of the tenants to the relevant waste store or the loading bay compactor periodically throughout the day using the goods lifts in the cores. The waste can then be collected directly from the waste stores by the waste contractor each day.
- 13.56 Therefore the DSMP confirms that the proposed development would comply with planning policy at all levels in terms of waste collection and management.

Conclusion

13.57 In terms of transport, servicing, deliveries and waste the Proposed Development complies with planning policy at all levels.



14 Amenity

14.1 This section assesses the potential effects of the Proposed Development in terms of amenity, which include noise, daylight and sunlight and air quality. The technical assessments for these issues are provided within the accompany Environmental Statement.

Noise

Policy

- 14.2 The NPPF contains guidance on noise management in planning decisions. Paragraph 185 states that the outcome of planning decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts. This paragraph contains recognition that development will 'often create some noise'.
- 14.3 London Plan Policy D14 places the responsibility for mitigating impacts from existing noise on the proposed new noise-sensitive development. New noise and nuisance-generating development proposed close to noise sensitive uses should put measures in place to mitigate and manage any noise impacts.
- 14.4 Local Plan Policy A4 is clear that the Council will seek to ensure that noise is controlled and managed, and that development should have regard to LB Camden's Noise and Vibration Thresholds.
- 14.5 Policy A5 of the Local Plan outlines that planning permission for noise generating development will only be granted if it can be operated without causing harm to amenity. The Council will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

<u>Assessment</u>

- 14.6 The Noise and Vibration Assessment (ES Chapter 12), prepared by Arup assesses the potential noise and vibration effects of the development upon noise sensitive receptors.
- 14.7 Noise sensitive receptors have been identified at the FCI, Levita House and St Pancras Hotel.



- 14.8 Construction noise and vibration effects may be expected during construction, but it is anticipated that only a small number of specific types of construction activities give rise to significant levels of vibration. The ES concludes that the anticipated vibration effects at Levita House, St Pancras Hotel and the FCI are not considered to be significant in ES terms. The noise effects of construction traffic using Midland Road are also considered to not be significant. The ES therefore does not propose mitigation in relation to these potential effects, but as noted in the Transport, Waste and Servicing section of this Planning Statement, any potential adverse effects arising from these activities would be managed through a Construction Management Plan. A Draft Construction Management Plan is submitted with this Application and the final version would be worked up in consultation with neighbouring property occupiers.
- 14.9 Given the unique nature of the FCI, with vibration sensitive equipment, discussions are ongoing around on a control and management approach to ensure vibrations effects are minimised.
- 14.10 Whilst the predicated noise effects from construction activities are not considered significant at the FCI as a receptor, it is recognised that additional mitigation may be required to manage these potential short-term construction effects experienced at the sensitive receptors of Levita House and St Pancras Hotel. The potential for the increased use of off-site fabrication and noise screening around identified noisy equipment along with careful programming of noisy activities would be explored as part of developing the future Construction Management Plan.
- 14.11 In terms of operational noise and vibration, operational traffic flows associated with the Proposed Development are expected to be up to 231 vehicles per day on Midland Road. In the context of the existing baseline vehicle flows this increase in traffic flows is less than 2%. On this basis the effect of operational traffic noise on Midland Road has been assessed as not significant and therefore no further additional mitigation is proposed beyond the measures set out in the supporting Transport Assessment.
- 14.12 Through the careful design and positioning of building services plant equipment, the Proposed Development would achieve noise levels that sit within the standard noise emission limits set by LB Camden.
- 14.13 Subject to the mitigation measures proposed during the construction period, the Proposed Development complies with planning policy at all levels in terms of noise and vibration.



Daylight and Sunlight

Policy

- 14.14 LB Camden Local Plan Policy A1 seeks to protect daylight/sunlight values within existing and proposed development. The text at paragraph 6.5 supporting Policy A1 states that in assessing daylight/sunlight values LB Camden will consider the most recent guidance published by the Building Research Establishment.
- 14.15 The Building Research Establishment (BRE) document Site Layout Planning for Daylight and Sunlight (2011) sets out guidance for achieving good sunlight and daylight levels within buildings and the open spaces between them. The methodologies and the resultant BRE daylight and sunlight recommendations are predicated upon a suburban model.
- 14.16 LB Camden's adopted Amenity CPG provides greater detail on what LB Camden expects from development proposals in terms of effects on daylight and sunlight receipt to neighbouring properties.

<u>Assessment</u>

- 14.17 GIA have prepared Chapter 9 of the ES which assess daylight, sunlight, overshadowing, solar glare and obtrusive light in respect of the Proposed Development.
- 14.18 Figure 1 of the chapter identifies the sensitive receptors to daylight and sunlight. The findings of the report can be summarised as follows:
 - Daylight effects minor adverse effects to Chamberlain House, negligible to major adverse effects to Hadstock House and negligible to moderate adverse to Levita House;
 - ii. Sunlight effects negligible effects to Chamberlain House and Levita House and,due to orientation, Hadstock House did not require assessment;
 - iii. Overshadowing effects negligible effect to all amenity areas;
 - iv. Solar glare minor adverse; and
 - v. Obtrusive light (light pollution) negligible to all receptors.



- 14.19 GIA have also prepared a Daylight Sunlight Non-Technical Summary to accompany the Daylight, Sunlight, Overshadowing, Solar Glare and Light Obtrusion Assessment within the ES., This submitted non-technical summary sets out the 'no balconies' assessment (as prescribed under the BRE Guidelines) undertaken for the windows of Chamberlain House, Hadstock House and Levita House, where some future effects have been identified. The 'no balconies' assessment has led to the following daylight results:
 - a. Chamberlain House: the existing light levels are already very low to these rooms due to their position behind a deep recess, GIA therefore consider that the daylight amenity receipt would not be unduly harmed by the Proposed Development..
 - b. Hadstock House: the windows that would experience daylight losses sit beneath deck access walkways, and so when the building's feature are modelled through the 'no balconies' scenario, the Proposed Development is considered to not cause undue harm to the daylight amenity of properties within Hadstock House; and
 - c. Levita House: again, the windows for this property are designed within recesses and below overhanging features. When these features are accounted for through the 'no balconies' adjustment it is considered that the proposed development would not cause undue harm to the daylight amenity within this property.
- 14.20 Building at the Site has been accepted in principle through the adoption of planning policy allocating the Site for redevelopment (Site 5) and the emerging site allocation (IDS 19). Any building at the Site would cause reductions in the existing daylight/sunlight enjoyed by residents at Levita House, Chamberlain House and Hadstock House.
- 14.21 Overall, GIA concludes that the Proposed Development is appropriate in its context and the changes in daylight and sunlight do not cause unacceptable harm to the relevant surrounding properties. The daylight and sunlight results are considered acceptable in the context of relevant planning policy, including the NPPF, which states that a flexible approach should be taken when applying policies or guidance relating to daylight and sunlight in order to optimise the development potential of a site, subject to the resulting scheme providing acceptable living standards.

Air Quality

14.22 At a national level, NPPF paragraph 185 advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely



effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the Site or the wider area to effects that could arise from development. In pursuance of this, development proposals should mitigate and reduce to a minimum any potential adverse effects upon amenity.

- 14.23 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (paragraph 174).
- 14.24 At the regional level, London Plan Policy SI1 states development proposals must be at least air quality neutral and should not:
 - a) lead to further deterioration of existing poor air quality;
 - b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;
 - c) create unacceptable risk of high levels of exposure to poor air quality.
- 14.25 At a local level, Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.
- 14.26 LB Camden Planning Guidance on Amenity states that all of LB Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO2) and particulate matter (PM10). As such all developments are to limit their impact on local air quality.
- 14.27 LB Camden Planning Guidance 'Air Quality' states that the Council's overarching aim is for new development to be 'air quality neutral', not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality ('air quality positive').
- 14.28 The London Borough of Camden has, since 2000, been designated an Air Quality Management Area. The LB Camden Air Quality Action Plan (2016) sets out a variety of actions to help reduce key air pollutants in the Borough arising from road traffic, gas boilers and other sources. Action 14 seeks to minimise emissions from the construction and operation of new developments by requiring developers to adhere to current and any superseding best practice guidance and supplementary planning guidance.



<u>Assessment</u>

- 14.29 Arup have prepared an Air Quality Assessment (AQA), submitted in support of the proposals as part of the Environmental Statement.
- 14.30 The AQA states that the construction and operational phases of the development are predicted to have a negligible impact on air quality at the sensitive receptors (both existing and new).
- 14.31 An air quality neutral assessment has been conducted and has demonstrated that the Proposed Development complies with air quality neutral policy and indicates that no further mitigation is required.
- 14.32 An Air Quality Positive statement has been prepared in respect of the Proposed Development following the publication of the GLA's Air Quality Positive London Guidance. Appendix E7 of the Air Quality ES Chapter sets out the mitigation measures that could be adopted to meet the draft Air Quality Positive standards.
- 14.33 Therefore, the Proposed Development is compliant with adopted policy at all levels in terms of air quality.



15 Other Considerations

- 15.1 This section assesses the development against other relevant material planning considerations. These are as follows:
 - a. Basements;
 - b. Archaeology;
 - c. Land Contamination;
 - d. Ecology and Biodiversity;
 - e. Trees;
 - f. Microclimate (wind);
 - g. Fire;
 - h. Electronic interference; and
 - i. Health.

Basements

Policy

- 15.2 Local Plan Policy A5 advises that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:
 - a. neighbouring properties;
 - b. the structural, ground, or water conditions of the area;
 - c. the character and amenity of the area;
 - d. the architectural character of the building; and
 - e. the significance of heritage assets.
- 15.3 Guidance for basement development is also provided within LB Camden's Basement CPG (January 2021). The Guidance outlines that the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property.

Assessment



- 15.4 A Basement Impact Assessment has been prepared by Arup. This demonstrates that the proposed development is unlikely to result in any specific land or slope stability issues, groundwater or surface water issues.
- 15.5 The report also demonstrates that all neighbouring structures are within the target Burland Category 1 damage ('Very slight'). Particular attention has been paid to the interface with the existing British Library building which is a Grade I listed structure. The structure is assessed to be marginally below the category 1/2 border (between 'very slight' and 'slight'). A secant wall and high support temporary retaining strategy is proposed to further limit ground movements.
- 15.6 The Basement Impact Assessment thus complies with the requirements of the LB Camden Local Plan Policy A5 and LB Camden's Basement CPG (January 2021).

Archaeology

Policy

- 15.7 London Plan Policy HC1 states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 15.8 Local Plan Policy D2 advises that the Council will protect the remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Assessment

- 15.9 An assessment of the potential effects of the Proposed Development on archaeology is included in Chapter 7 of the Environmental Statement prepared by Arup.
- 15.10 The Chapter outlines that given the Site's truncation and disruption because of nineteenth century development, the potential to encounter archaeological remains relating to the prehistoric to the early point-medieval period is very low. Whereas the potential to encounter archaeological remains within the Site relating to the late post-medieval and modern periods is high and would most likely be the industrial remains of the late 19th century Somers Town



Goods Yard. The significance of these remains are considered to be between 'not significant' to 'of low significance'. (paragraphs 1.7.3-1.7.5).

- 15.11 The magnitude of change has been set out in the Chapter at paragraphs 1.7.7-1.7.9. The effects on locally significant archaeological remains of the late 18th and 19th century Somers Town would experience a large magnitude of change and therefore a moderate adverse effect from the construction and existence of the Proposed Development. The locally significant remains of the late 19th century Somers Town Goods Yard would experience a large magnitude of change and therefore a moderate adverse effect from the construction and existence of the Proposed Development.
- 15.12 Good practice measures in respect of archaeology have been embedded into the draft CMP, include: i) fencing and hoarding which would provide adequate screening for buried archaeological remains as required and ii) provision of adequate security to prevent unauthorised entry to the Site including areas of archaeological works.
- 15.13 In line with NPPF requirements, additional mitigation is proposed in the form of an archaeological watching brief during construction, and in accordance with an agreed Written Scheme of Investigation (WSI) setting out the research aims and objectives and outlining plans for the public dissemination of the results, to be agreed with the GLAAS representative for LB Camden.
- 15.14 As a result of the proposed additional mitigation, the large magnitude of change experienced by any surviving heritage assets within the Site would be offset by recording and advancing understanding of their significance, and publicly disseminating the results. The residual effects of the development would therefore be neutral and not significant.
- 15.15 In terms of archaeology the Proposed Development is compliant with planning policy at all levels.



Land Contamination

Policy

15.16 Policy A1 of LB Camden's Local Plan states that the Council seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity, including factors such as contaminated land.

Assessment

- 15.17 Table 25 of the submitted Geotechnical Desk Study and Contamination Risk Assessment prepared by Arup summarises the geohazards identified at the Site and the possible mitigation strategies. The Assessment confirms that the environmental sensitivity of the Site is generally low and that chemical testing undertaken during limited ground investigation on-site and in the surrounding area indicates that previously recorded contamination levels were generally low.
- 15.18 Section 8 of the Assessment sets out the recommendations for actions going forward, including ground investigation and further contamination assessment.

Ecology and Biodiversity

Policy

- 15.19 Paragraph 179 of the NPPF is clear that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity and minimising effects on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 15.20 London Plan Policy G6 states that development proposals should manage effects on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 15.21 Policy G6 also adds that proposals which reduce deficiencies in access to nature should be considered positively.
- 15.22 At the local level Policy A3 (D) adds that LB Camden will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the



built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.

15.23 Part F of Policy A3 outlines that LB Camden will seek to improve opportunities to experience nature, in particular where such opportunities are lacking, and part G adds that the Council will require the demolition and construction phase of development to be planned to avoid disturbance to habitats and species.

Legislation

15.24 Under the Environment Act (2021) there is a legislative requirement to demonstrate a 10% Biodiversity Net Gain (BNG) in new developments.

<u>Assessment</u>

- 15.25 The Proposed Development would deliver a 32.69% BNG at the Site.
- 15.26 Bird and bat boxes have not been proposed near the BLCC and the other British Library spaces to protect the invaluable collections of national and international importance from the risk of vermin.
- 15.27 The Proposed Development incorporates a significant quantum of green roofs, delivering a total of 3,632.3 sqm.
- 15.28 The proposed design has been developed to mitigate effects on the pre-development Site biodiversity and to maximise the opportunities for biodiversity post-development. The existence of the Story Garden (meanwhile use) has encouraged and pushed the design team to find innovative solutions and maximise the opportunities at the Site. The designs have also focused on selecting plant species that are resilient to climate change to help ensure the longevity of the Site's biodiversity value.
- 15.29 The Biodiversity Net Gain Assessment Report therefore demonstrates that opportunities to maximise biodiversity at the Site have been taken and concludes that a rich and biodiverse ecology would be provided, in line with adopted planning policy.



Trees

Policy

- 15.30 Policy G7 of the London Plan states that new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest the area of London under the canopy of trees. Policy G7 adds that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed.
- 15.31 Part C of Policy G7 advises that the planting of additional trees should generally be included in new developments particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
- 15.32 LB Camden Policy A3 is clear that the Council will protect, and seek to secure additional, trees and vegetation.
- 15.33 Further guidance can also be found in LB Camden's Trees CPG (March 2019).

Assessment

- 15.34 An Arboricultural Report, prepared by Tim Moya Associates, has been submitted in support of this application. The Site was visited, and the trees and other vegetation surveyed, referring to the recommendations of BS5837 in August 2021.
- 15.35 LB Camden confirmed on 10 September 2021 that there are no Tree Preservation Orders (TPOs) on the Site.
- 15.36 The Proposed Development includes the removal of all of the surveyed trees within the Site (including other forms of vegetation), which comprises 5no. trees, 2no. vegetation groups, and 1no. shrub.
- 15.37 The landscape strategy that forms part of the Proposed Development includes the planting of 175no. new trees, comprising various genera including maple (Acer), birch (Betula), dogwood (Cornus), thorn (Crataegus), and willow (Salix). Considering that a large portion of the existing surveyed vegetation is recorded within estimated groups (comprised mostly of shrubs), the strict net gain in individual tree terms is 170 trees. The report therefore concludes that the



Proposed Development whilst resulting in the loss of trees from the site would make a very significant and positive improvement to the area.

Microclimate (wind)

Policy

- 15.38 London Plan Policy D9 advises that wind conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.
- 15.39 Policy A1 of LB Camden's Local Plan states that the Council seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity, including factors such as microclimate.
- 15.40 Supporting text 6.24 adds that developments should consider local topography and the local microclimate in their design. Developments large enough to alter the local climate will be required to submit a statement demonstrating how the design has considered local conditions.

Assessment

- 15.41 A thorough Environmental Wind Assessment was undertaken as part of this application and forms part of the Environmental Statement submitted with this application.
- 15.42 The Assessment was undertaken using a physical model and considers the potential effects of cumulative developments. The results show that the proposed development would have a negligible impact on wind conditions and therefore no additional mitigation measures are required.

Fire

Policy

15.43 Policy D12 of the London Plan illustrates the importance of fire safety and ensuring the safety of all building users meaning all development proposals must achieve the highest standards of fire safety. Developments should be constructed in an appropriate way to minimise the risk of fire spread, provide suitable means of evacuation and should develop a robust strategy for



- evacuation which can be periodically updated and published, and which all building users can have confidence in.
- 15.44 All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 15.45 Paragraph 3.12.1 of the London Plan goes on to state that the fire safety of developments should be considered from the outset. Development agreements, development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety.
- 15.46 Local Plan Policy D1 advises that the LB Camden will require that development carefully integrates building services equipment, including fire escapes.

<u>Assessment</u>

- 15.47 The submitted Fire Statement, prepared by Arup, sets out the fire safety measures that would be provided within the Proposed Development.
- 15.48 The fire safety management principles proposed have been developed with early input from the British Library and SMBL Developments Limited and have informed the design of the scheme from the outset.
- 15.49 A Fire Safety Management Plan would need to be developed by the future occupiers to incorporate the requirements set out in the Fire Statement. The Management Plan would need to ensure that any potential modifications to the building take into account the base build fire protection measures.
- 15.50 Compliance with planning policy at all levels has therefore been demonstrated in respect of fire safety.

Electronic Interference

Assessment

15.51 The likely significant effects of the Proposed Development on electronic interference are covered in Volume 1, Chapter 13 of the Environmental Statement.



- 15.52 Consultation with Airwave has identified that the use of tower cranes and other temporary structures on the Site during construction may give rise to effects. Airwave have concluded that further engagement would be required during the construction of the Proposed Development to identify any potential interference with their fixed point-to-point telecommunications link, and where relevant to agree mitigation measures to limit or avoid any interference during construction. It is expected that this would be the subject of a planning condition.
- 15.53 Consultation with Airwave has also concluded the south-east corner of the Proposed Development would interfere with the radio transmission path of the fixed point-to-point telecommunications link, which has been assessed as a significant effect.
- 15.54 Two main methods for mitigation are proposed:
 - Physical repositioning of the link antennas at the same locations to avoid transmitting across the Site of the development; and
 - Rerouting of the transmission link in order to avoid transmitting across the Site of the development. This may involve introducing a new intermediate link or moving one or more of the existing link antennas to a new location.
- 15.55 The cumulative effects of the proposed development have also been assessed. From analysis of the locations of the identified committed developments, none of these are located within the radio transmission path between the two ends of the emergency services fixed point-to-point telecommunications link. They therefore would not interfere with the link, and it can be concluded that cumulative effects would not occur.
- 15.56 Further consultation would be undertaken with Airwave at the detailed design stage to agree the appropriate mitigation method for the Proposed Development.

Health

Policy

- 15.57 London Plan Policy GG3 sets out what the GLA requires those involved in planning and development to do to improve Londoner's health and reduce inequalities.
- 15.58 Policy C1 of LB Camden's Local Plan advises that the Council will improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local



services to support health, social and cultural wellbeing and reduce inequalities. In addition, measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate.

15.59 Policy C1 also outlines that the Council will require development to positively contribute to creating high quality, active, safe and accessible places. Proposals for major development schemes should also include a Health Impact Assessment (HIA).

Assessment

- 15.60 The Health Impact Assessment (HIA), prepared by Arup summarises the impact of the Proposed Development both during construction and operation against health determinants.
- 15.61 Section 10 of the Assessment presents the recommendations at the Site for improving health outcomes during construction and operation. These include:

Construction:

- i. Before the relocation of the Story Garden, alternative locations for temporary and permanent provision of open space and community garden are identified;
- ii. Confirmation of noise and vibration mitigation measures;
- iii. Establishment of a Neighbours' Advisory Panel (NAP) as a vehicle for community consultation; and
- iv. Development of public realm designs in consultation with the public.

Operation

- Implementation of sustainable design aspirations, if practicable, including aspiration for BREEAM 'Outstanding';
- ii. Exploration and implementation of ways to promote and incentivise the use of the community garden to ensure the space is used by the local community;
- iii. Implementation of the publicly accessible nature of the Site's ground floor plane and ensuring consideration of the local community's use of the space in detailed design of the space; and
- iv. Opportunities to work with young people should be implemented.



15.62 Therefore the Proposed Development is considered to comply with planning policy at all levels in respect of health outcomes.



16 Planning Obligations and Community Infrastructure Levy

- 16.1 On 6 April 2010 the Community Infrastructure Levy Regulations 2010 came into force. The regulations require all planning obligations to be:
 - i. necessary to make the development acceptable in planning terms;
 - ii. directly related to the development; and
 - iii. fairly and reasonably related in scale and kind to the development.
- The NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition (paragraph 54). In addition, paragraph 56 states that planning conditions must only be sought where they are:
 - i. necessary to make the development acceptable in planning terms;
 - ii. directly related to the development; and
 - iii. fairly and reasonably related in scale and kind to the development.
- 16.3 Strategic Policy CS4 requires contributions through the Community Infrastructure Levy (CIL) to assist in the delivery of the infrastructure necessary to support the implementation of the Local Plan. It also requires S106 planning obligations, having regard to the impact of the obligation on the viability of development, for: site specific mitigation; affordable housing; local training, skills and job brokerage; and local procurement in the City and City Fringe
- 16.4 The proposed development would give rise to a CIL payment, to help fund the provision of infrastructure in LB Camden and transport infrastructure. These contributions would be in accordance with Supplementary Planning Guidance (SPG) and Documents (SPDs) adopted by the Mayor of London and the Council, respectively.
- 16.5 Pre-application discussions have been held with LB Camden's CIL officer. The following principles in the approach to the calculation have been agreed:



- i. The proposed CR2 floorspace including: void to enable a pedestrian tunnel, ventilation and escape shaft and a fan chamber. As per paragraph 6(1)(b) of the CIL Regulations (2010) this area has been excluded from the calculations as it is area where (a) '...people do not normally go' and (b) '...people go only intermittently for the purpose of inspecting or maintaining fixed plant or machinery' and is therefore not to be treated as 'development' for the purposes of CIL. This point has been discussed and agreed previously with LB Camden, 9 April 2019 (See Appendix C);
- The Library floorspace would have a £0 value, as per the LB Camden CIL Charging Schedule (October 2020); and
- iii. The development Site falls outside the Central London Area for the purposes of MCIL2 and therefore all new floorspace (except for the CR2 floorspace) is subject to a MCIL2 charge rate of £80/sqm.
- 16.6 LB Camden's Developer Contributions CPG (March 2019) provides further guidance on developer contributions covering both CIL requirements and S106 planning obligations.
- 16.7 The following planning obligations may also be required or where possible, appropriate and in accordance with guidance, may be secured by condition:
 - i. The provision of on-site affordable workspace;
 - ii. Agreement and implementation of an Employment and Training Strategy;
 - iii. Package of end-use employment and training obligations;
 - iv. Employment and training contribution;
 - v. Potential payment in lieu of the provision of on-site and off-site market and affordable housing:
 - vi. Construction Management Plan (CMP);
 - vii. CMP monitoring fee;
 - viii. Travel Plan;
 - ix. Travel Plan monitoring fee;
 - x. Pedestrian, Cycle and Environment improvements;
 - xi. Highways improvements;
 - xii. Delivery and Servicing Management Plan;
 - xiii. Agreement and implementation of a Sustainability Plan;
 - xiv. Carbon offset contribution;



- xv. Agreement and implementation of an Energy Plan;
- xvi. Agreement and implementation of a Basement Construction Plan;
- xvii. Somers Town Compact Management Plan;
- xviii. Car Parking Management Plan;
- xix. Short-stay cycle parking provision; and
- xx. Community Learning Garden.



17 Summary and Conclusions

- 17.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Planning Statement has assessed the proposed development against the development plan and other relevant planning policy and guidance at national, regional, and local policy level.
- 17.2 The Proposed Development has been subject to thorough pre-application discussions with local residents, businesses, LB Camden, the GLA, TFL, Historic England and other interested parties. The applicant has always sought to consider and where possible incorporate the responses received.
- 17.3 The Proposed Development has been designed by RSHP, Arup and DSDHA and comprises the demolition of the existing BLCC building to deliver an extension to the northern aspect of the existing British Library to provide library accommodation; commercial space designed to cater for Knowledge Quarter uses (including life sciences, cultural, scientific and heritage collections and data sciences); retail space; and Crossrail 2 works at basement level and new public realm.
- The Proposed Development is unique in its bringing together of three strategic priorities for LB Camden, London and the UK: (i) an extension of national institution (the British Library); (ii) the delivery of a major commercial, including lab-enabled, development within the Knowledge Quarter Innovation District (KQID); and (iii) the provision of Crossrail 2 (CR2) infrastructure to a safeguarded site.
- 17.5 The Proposed Development brings forward a package of transformative benefits through the British Library's 'Living Knowledge For Everyone' initiative, which forms part of the Government's wider ambition to reinforce the UK and London as a global centre for research and technological advances. The Proposed Development presents the opportunity to deliver a once-in-a-generation transformation to extend the British Library, making it the most open, creative and innovative institution of its kind anywhere in the world.
- 17.6 The proposed development would deliver the following substantial public benefits:



Environmental

- Aspiring to BREEAM Outstanding with a minimum target of BREEAM Excellent;
- Improved permeability across the British Library Site and new connections to neighbourhoods in the British Library's immediately surrounding area;
- Provision of cycle and runner-commuter facilities to encourage sustainable transport options such as cycling and walking to reduce pollution from transport;
- Diversion of 95% of construction waste from landfill and would seek to retain waste at its highest level of utility, favouring re-use over recycling wherever feasible;
- Biodiverse roofs and planting at ground level to incorporate habitat and species that can thrive in the local environment and use the Site as a stepping stone to larger sites nearby;
- Deliveries and servicing to occur via Midland Road;
- Creation of three distinct externals zones an arrival zone for the library and commercial
 uses off Midland Road, an enhanced public realm between the building and existing
 Dangoor Walk and a community garden and pedestrian entranceway to the library off
 Ossulston Street;
- The public realm at ground level would incorporate permeable landscaping, contributing to the Site-wide surface water drainage strategy, in line with the SUDS hierarchy;
- Delivery of CR2 infrastructure, mainly below ground optimising public realm on the west of the Site, to deliver significant improvements to LB Camden and London's public transport network in the longer term;
- Preserving the character and appearance of the Grade I listed British Library and enhancing its role in the lives of local people through increasing its size and reach;
- Preserving the character and appearance of the Kings Cross conservation area and providing beneficial effects on local views by delivering a building of townscape merit to a Central London location; and



39% reduction in carbon emissions against Part L.

<u>Social</u>

- Major extension to a nationally and internationally significant public institution (the British Library) (delivery funded by SMBL Developments Limited);
- Provision of approx. 10,000sq.m of new British Library Space to increase the Library's learning, exhibition, events and business facilities These would be flexible and versatile spaces suitable for use by the community and able to host: exhibitions, art shows and events etc;
- Increased permeability and accessibility of the British Library and associated facilities, including a new entrance from Ossulston Street and a publicly accessible ground floor to reinforce the knowledge ecosystem and create a democratic space accessible to all;
- Establishment of Community Advisory Groups (run by the British Library) whereby the community can be involved in the creation of collaborative projects and the long-term delivery of community-based services;
- The Somers Town (ST) Compact (an SMBL initiative) would enable occupiers to access a
 readymade programme of initiatives based on the needs and requirements of the local
 communities, including education, employment as well as environmental and healthrelated projects. This would bring occupiers, the British Library, and other KQ
 organisations together to explore opportunities and local projects;
- Continuation of the British Library's Community Engagement Team and engagement programme with the local community and local schools;
- Delivery of the British Library's 'Living Knowledge For Everyone' initiative;
- A Community Learning Garden would be delivered on the Ossulston Street side of the Site and would be co-curated, designed and managed by members of the local community;
- Commencement (September 2020) and continuation of Community Gardener,
 coordinated by Global Generation (GG) and funded by SMBL. The scheme employs a local



person whose role it is to help people create their own gardens and amenity and identifies other greening projects the community might like to pursue; and

- SMBL would fund¹¹ DSDHA and GG to map existing greening projects and work with residents to identify potential further greening projects in Somers Town. These projects could be delivered during the construction period. If stakeholders agree that local CIL funding generated by the Proposed Development can be used to realise these projects, this could deliver long term positive benefits for the surrounding communities, complementing the proposed on-site Community Learning Garden. SMBL sent a letter to stakeholders on 20 September 2021 requesting a discussion on this matter and would continue to engage on this point.
- SMBL are also continuing to work with LB Camden officers to identify opportunities to facilitate the delivery of affordable housing in Somers Town.

Economic

- The development of CR2 infrastructure at the Site in an innovative way, to optimise the public amenity of the Site, delivering benefits to LB Camden and local residents;
- Approximately 170 jobs during the construction period first targeted at LB Camden residents via the Kings Cross Construction Skills Centre and others working alongside LB Camden's Economic Development team;
- An approximate increase in local net GVA by £2.4b over a ten-year period after completion of the extension (as evidenced in the Knowledge Quarter Uses and Economic Value Statement, prepared by Arup, dated November 2021);
- An approximate increase in local spending in LB Camden by £53m over a ten-years period
 after completion of the extension (as evidenced in the Economic Value and Knowledge
 Quarter Uses Statement, prepared by Arup);

¹¹ Proposed funding to include/cover: preliminary work to identify and prepare one or two concept schemes and progress schemes designs up to Stage 2 / to a position where they could be implemented.



- Provision of work placements and apprenticeships during the construction period and development of Employment and Skills Plan (construction and end user) with targets for apprenticeships, work experience placements, training opportunities. Final numbers would be determined in line with Camden Planning Guidance;
- Creation and access to a diverse range, and significant number of jobs within the completed development;
- Apprenticeships made available each year in the completed development within a range of roles;
- The British Library would continue its work with, and the Applicants would sign up to,
 STEAM pledges;
- Promotion of the Camden STEAM Commission objectives and other LB Camden initiatives such as Good Work Camden, amongst end users and occupiers;
- Requiring London Living Wage as a minimum salary for all employees;
- Provision of free wifi and study desks within the British Library Extension;
- Help start-ups and micro businesses to grow and achieve success through the expansion of the Library Business and Intellectual Property Centre in the British Library Extension by:
 - 'targeting support for Camden's businesses and start-ups through the offer of (i)
 affordable workspace to SMEs and (ii) a robust business support network with
 support facilities, equipment and mentoring; and
 - maximising the opportunities for local businesses to supply goods and services at the construction and end user phases;
- Target local recruitment through Kings Cross Construction Support Centre (KXCSC), the Somers Town Job Hub and Good Work Camden;
- Maximising the opportunities for local businesses to supply goods and services at the construction and end user phases;



- Provision of affordable workspace within the commercial space at a discounted market rate; and
- Encouraging occupiers of the building to enter into the ST Compact for a community outreach programme to provide education, services and support to the community and local schools. SMBL would support a programme of events to bring the local community, businesses, library and KQ occupiers together to explore opportunities and local projects.
- 17.7 The Proposed Development demonstrates that it satisfies statute and exceeds planning policies at national, regional and local levels and in addition meets the aims of emerging policy aspirations in respect of the KQ; and
- 17.8 The proposals accord with applicable planning policy, guidance and objectives to deliver sustainable, mixed-use development and full planning permission and listed building consent should be approved accordingly.



Appendix A – Full Site Planning History



British Library, 96 Euston Road, London, NW1 2DB

Date Registered	Reference No.	Type of Application	Description	Decision
26-01-2022	2021/5617/L	Listed Building Consent	Provision and installation of new platform lift adjacent to main reception to improve inclusive access to the entrance hall of the building. Enlargement of existing lift at rear of entrance hall to improve inclusive access to the building	Pending
14-10-2021	2021/4303/P	Full Planning Permission	Installation of laterally mounted photovoltaic and thermal (PVT) collector arrays at the fourth floor and the installation of internal pipework and associated plant at basement level of existing library building.	Granted
14-10-2021	2021/5028/L	Listed Building Consent	Installation of laterally mounted photovoltaic and thermal (PVT) collector arrays at the fourth floor and the installation of internal pipework and associated plant at basement level of existing library building.	Granted
26-07-2019	2019/3572/P	Full Planning Permission	Improved inclusive access works from the Piazza to Main Entrance of the British Library; including new ramp, steps, handrails, balustrades and terraces.	Granted
26-07-2019	2019/3835/L	Listed Building Consent	Improved inclusive access works from the Piazza to Main Entrance of the British Library; including new ramp, steps, handrails, balustrades and terraces.	Granted
05-07-2019	2019/3432/P	Full Planning Permission	Erection of temporary structures in connection with the temporary use as educational community garden (Class D1) for a period of 3 years (amendment to approved planning permission reference 2018/5663/P, dated 09/01/2019, namely to include additional / altered facilities)	Granted



	Т			Т
29-03-2019	2019/1556/P	Full Planning Permission	Temporary erection of a marquee structure to provide temporary event space within the British Library's piazza for a period of 7 weeks (Use Class D1)	Granted
02-01-2019	2018/6137/L	Listed Building Consent	Internal works to the Paccar Gallery, comprising the formation of a new opening into the exhibition workshops, installation of new partitions, alteration of ceiling grid and installation of new lighting track system.	Granted
02-01-2019	2018/5813/L	Listed Building Consent	Internal works consisting of the removal of a wall and associated works, to enhance access to the shop, on the ground floor of the Library.	Granted
26-11-2018	2018/5663/P	Full Planning Permission	Erection of temporary structures in connection with the temporary use as educational community garden (Class D1) for a period of 3 years	Granted
23-07-2018	2018/2879/L	Listed Building Consent	Internal works comprising the installation of a wheelchair lift, and associated adaptations to enable level access to the auditorium stage in the Knowledge Centre.	Granted
03-04-2018	2018/1316/P	Full Planning Permission	Temporary erection of a marquee structure to provide temporary event space within the British Library's piazza for a period of 8 weeks (Use Class D1)	Granted
10-05-2016	2016/2325/L	Listed Building Consent	Installation of new DDA compliant fully glazed access lift within staircase 62, serving Levels 1, 2 & 3.	Granted
10-05-2016	2016/2294/L	Listed Building Consent	Works of refurbishment and alteration for the St. Pancras Transformed project comprising the creation of a new British Library Members' and Friends' Rooms, upgrade of bar and foyer space in the Conference Centre, and associated works.	Granted
20-04-2016	2016/1234/L	Listed Building Consent	Internal refurbishment of the 1st floor office space and associated	Granted



			works to house the Alan Turing Institute.	
01-05-2015	2015/1632/P	Full Planning Permission	Installation of 9 free standing luminaire lights to illuminate the clock tower and 5 free standing lights and associated works to new bronze plinth to illuminate the Newton statue.	Granted
11-08-2010	2010/4153/P	Full Planning Permission	Relocation of the British Library vehicular access to replace existing temporary access point on Midland Road	Granted Subject to a Section 106 Legal Agreement
18-11-2009	2009/5267/P	Full Planning Permission	External alterations including addition of handrails at Gate 3 and a ramp and associated handrails at Gate 4 of the British Library	Granted
26-05-2006	2006/1288/P	Full Planning Permission	Amendments to planning permission 2004/4593/P (for erection of a single storey kiosk within the forecourt piazza of the British Library for use as a cafe with associated disabled access) involving relocation of the cafe building and erection of a group of 6 umbrellas with associated tables and seating to upper piazza area.	Granted
08-03-2005	2004/4593/P	Full Planning Permission	Erection of a single storey kiosk within the forecourt piazza of the British Library for use as a cafe with associated disabled access.	Granted
14-02-2005	2005/0214/P	Full Planning Permission	Erection of a three storey library conservation centre; the formation of a first floor terrace over existing loading bay yard; and associated works, including alterations to external works and car park layout.	Granted Subject to a Section 106 Legal Agreement
07-05-1998	PS9804410	Full Planning Permission	Extension of use of existing temporary office block for duration of further building works. (Erected originally for use by the British Library project team by the Department of National Heritage), as shown on drawing numbers 001, 002, 003 and 004.	Granted



30-03-1998	PS9804261	Full Planning Permission	Change of use to retail (A1) for use as a sandwich bar. (as shown on drawing nos. 100.01, 100.03 and site plan)	Granted
04-05-1994	9470131	Listed Building Consent	Minor internal alterations to advance reservations office. as shown as drawings numbered 91/166/94.3 94.4 and 94.5	Granted
07-02-1994	9470033	Full Planning Permission and Listed Building Consent	Erection of 2 external fire escape stairs and enclosure of an existing internal stair. as shown on drawing no(s) 93/210 01 10A 20A 21A 22 30A 31A 32.	Granted
04-03-1980	30106	Historic Planning Application	Use of an area fronting Phoenix Road for temporary vehicle storage.	Refused

Land to the Rear of The British Library at 96 Euston Road London, NW1 2DB

Date Registered	Reference No.	Type of Application	Description	Decision
10-05-2021	2021/2164/P	EIA Scoping Opinion	Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the creation of commercial space and the extension of the existing British Library and Crossrail 2 works at basement level within approximately 73,000sqm of commercial space; 10,000sqm of new library accommodation and the Alan Turing Institute; 1,700sqm of the replace BLCC and British Library Sound Archive and 5,000sqm of infrastructure located at basement level for Crossrail 2, along with associated basements; landscaping; highways works; parking bays; public realm; cycle spaces; plant; large vehicle access and servicing.	EIA Required
14-09-2010	2010/4721/P	Full Planning Permission	Development to provide a biomedical research centre	Granted Subject to



			including laboratory and research space, lecturing and teaching space, exhibition space and a community facility; landscaped public open spaces; a new pedestrian route between Midland Road and Ossulston Street; a service entrance off Brill Place and a relocated vehicular access from Midland Road to serve the British Library.	a Section 106 Legal Agreement
19-06-2007	2007/0894/P	Full Planning Permission	Creation of new vehicular and pedestrian access to the rear of the British Library to the eastern side of Ossulston St; formation of new private access road to existing British Library parking and servicing areas, including related excavation of land and installation of retaining walls and elongated mound / bund.	Withdrawn
07-06-1990	9000278	GG - Data Take on	Amendments to design of British Library development including the completion of the final stage as shown on drawing numbers CP/142D 143D 145D 146D 147D 319 & 321 CP/20/03F 04F 05F 06G 07F 08F 09F 10F 11F & 12E and CP/302/02 & 03A.	Observatio ns – no objections
04-03-1980	30105	Historic Planning Application	Use of an area of land fronting Euston Road as a car park for up to 120 cars in connection with St. Pancras and Kings Cross stations and of a block of land between Midland Road and Ossulston Street for coach parking and up to two acres of commercial vehicle parking.	Refused



Appendix B – Historic England Citation for the British Library



Location

The British Library, piazza, boundary wall and railings to Ossulston Street, Euston Road and Midland Road

Overview

Heritage Category: Listed Building

Grade: I

List Entry Number: 1426345 Date first listed: 31-Jul-2015

Location Description: The British Library, 96 Euston Rd, London NW1 2DB

Summary

Public Library, the present design based on that of 1975-8, built 1982-99, though opened in 1997; architect Sir Colin St John Wilson, with M.J. Long, Douglas Lanham, John Collier, John Honer and many more.

Reasons for Designation

The British Library designed by Sir Colin St John Wilson with M.J. Long, built 1982-99, is listed at Grade I for the following principal reasons: * 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; * Materials: for its level of craftsmanship and skilful handling of a range of materials externally and internally, including Travertine, Portland and Purbeck stone, granite, Leicestershire brick, bronze and American white oak throughout, carefully and meticulously detailed; * Interior: for the well-planned interior spaces comprising the generously lit reading rooms and multi-level atrium, successfully fulfilling the brief to create the nation's Library; * Historic Interest: in the tradition of the Royal Festival Hall, it is a landmark public building incorporating at its heart the King's Library, given to the nation by George III; * Architect: a major work by the eminent architect and academic Sir Colin St John Wilson and his architectural partner, M.J. Long. Wilson has a number of listed buildings to his name notably the St Cross libraries at the University of Oxford (Grade II*); * Artistic interest: for the fusion of art with architecture as a component of the design ethos, exemplified by Paolozzi's Newton in the piazza; * Group Value: with the Grade I St Pancras Hotel, Grade II Camden Town Hall and Grade II housing on Ossulston Street.

History

The British Library has a long and complex history before it was even imagined on its current site. In 1757 George II presented the Royal Library of 10,500 volumes collected by British monarchs from Henry VIII to Charles II, a gift which brought with it the privilege of receiving a copy of every book registered at Stationers' Hall. Further donations of manuscripts and state papers followed including the gift of George III's books by George IV, and the building of the King's Library was the first phase of the British Museum built in Great Russell Street in 1823-6. In 1852-7 the courtyard of Sir Robert Smirke's building was infilled by a new Reading Room, designed by his brother Sydney. In 1911 the Copyright Act granted the Library a copy of every book, periodical or newspaper published in Britain. The Newspaper Library had been built at Colindale in 1904-5; in 1914 the Edward VII galleries were opened and in 1937 the North Library was constructed within them. The congestion was intense and delays in waiting for books notorious.

The 1943 'County of London Plan' suggested the opening up of land south of the British Museum in Bloomsbury to form an open space and provision for new library facilities, although ideas of opening up a vista from the British Museum go back much further, for example to W. R. Lethaby's idea of the 'Sacred Way' linking it to Waterloo Bridge made in 1891. In 1962 Sir Leslie Martin and Colin St John Wilson were among a number of architects invited to compete by interview for the project, just as they were completing the St Cross group of libraries for Oxford University. These were three libraries, reached at different levels off an external staircase that forms the centrepiece of the design. The small library for the Institute of Statistics has gone, but the English



and Law libraries are both square and top lit, with galleries and peripheral carrels. For Leslie Martin evolution was more important than innovation, something he noted that Alvar Aalto had identified in his own library work, and he suggested in his 'Buildings and Ideas', 1933-83, from the Studio of Leslie Martin and his Associates, Cambridge University Press, 1983, that having determined an ideal plan at St Cross, which was repeated for each of the three libraries there, it only needed refinement elsewhere. This idea was developed further by Wilson.

Wilson felt that the success of the St Cross libraries recommended him and Martin to the Ministry of Public Buildings and Works. Nevertheless their first proposals combined the stepped internal courtyard plan of St Cross (and their other university work) within a larger context. The first scheme, approved early in 1964, was an ambitious project that created a piazza south of the British Museum down to Nicholas Hawksmoor's St George's, Bloomsbury. To the east would be a new library for books, maps, music and manuscripts, while to the west would be a gallery, archives for prints and drawings, and a conference centre. There would also be a residential development, with shops, publishers' offices and a public house.

Elements of Martin and Wilson's St Cross scheme can be seen in the eastern block of the proposal, and of the practice's Harvey Court, Cambridge, in the western, but on a scale and grandeur that was unprecedented, and with a basement archive going down some seven storeys under the piazza. Then a new Labour Government asked for a scheme that would also include the Science and Patents departments as well as the Library's humanities collections. The desire for a doubling of the library accommodation coincided with growing conservation pressure, always sensitive in Bloomsbury, which demanded the retention of properties on Bloomsbury Square and a consequent reduction in the size of the development site. Martin withdrew in 1970. In 1972 Wilson produced a dense scheme for a large new British Library - a square, stepped block for the main collections and a long wing for the Science Collections, together with a residential precinct of stepped terraces running eastwards from St George's Bloomsbury. Recognising the scale of what was required, in 1973 the Government instead purchased nine acres of the St Pancras Goods Yard then being vacated by British Rail, and Wilson set to work on a new scheme in 1975. The brief was now to serve an independent British Library, formed by the British Library Act of 1972 that brought together the British Museum Library, the National Central Library and the National Lending Library for Science and Technology. In 1980 a small extension by Wilson to the British Museum on Museum Street was opened.

The BL site is a wedge-shaped piece of land bounded by Euston Road to the south, by Midland Road to the east and by Ossulston Street to the west. Wilson's designs, which rapidly gained approval in 1978, retained the idea of placing the Science and Patent collections in a long wing, which with conference facilities and staff offices lines Midland Road. A series of square, top-lit libraries with galleries, serve the remaining collections, with a large general reading room, and specialised libraries for studying rare books, music and maps. Between the two areas was planned a vast Reference Reading Room an entrance hall, and a new piazza on to the Euston Road. Wilson's aim was to create an environment that was 'vivid, pleasurable and memorable, while fitting with responsibility and sensitivity into its context'. The RIBA Journal for April 1978 (from which that quotation is taken) estimated that it would take twenty years to build. The Bloomsbury scheme was described as 'monumental' and 'classical', that at St Pancras 'a contemporary, stripped vernacular look' (Building Design, 10 March 1978) yet within the context of Wilson's whole body of work the similarities are greater than the differences, and show the evolution of his designs in the manner Martin and Aalto considered so important.

In 1978 the decision was made to build the design in three phases. Work began in 1982, when Princes Charles laid the foundation stone, but following extensive tests to the foundations the main building campaign began in 1984. The engineers, Ove Arup and Partners, faced a monumental task in constructing such a deep basement area out of the London clay so near major London Underground tunnels and next to the Grade I-listed St Pancras Station and Hotel. Phase 1, representing c 60% of the whole project, was sub-divided into three for the purposes of measuring annual expenditure targets. Phase 1a provided an equivalent space to that existing in Bloomsbury,



with Phases 1b and 1c allowing for moderate expansion. The existing building is essentially a reduced version of phase 1 - following a decision made in December 1987 to complete the building to this reduced scale, leaving the scheme with scarcely more seats than had the old Reading room in Bloomsbury. Wilson commented that 'it was like constantly pulling a plant up by the roots to see if it was still alive and then cutting a bit off before shoving it back in the ground' (Stonehouse, 2007, 111). The design as built was more sophisticated than the original. The Humanities and specialist reading rooms were already grouped in two square, top-lit areas (making for a larger entrance courtyard than in the 1978 design) and the Science collections given their separate wing. In 1986-7 Wilson replaced the original Reference Reading Room with a central glazed casket or shrine, the King's Library likened by him to the Kaaba at Mecca but also with similarities to the Beinecke Rare Book Library at Yale University in New Haven by Gordon Bunshaft of SOM, and placed comprehensive café facilities behind it. A library for the India Office collection and exhibition areas were designed at this stage. To the rear, the north elevation was designed to allow for future extension. The principal works of art, including Eduardo Paolozzi's Newton (1995) after William Blake and a tapestry based on R. B. Kitaj's If Not, Not, were commissioned at this time. The leather reader chairs were specially designed by Ron Carter.

It was also in 1990 that the National Audit Office complained that it was the very decision to phase the work that had cost so much time and money, made worse by the subsequent sub-division of that phasing, and the stop-go funding of the project throughout the 1980s. The project was split between the Office of Arts and Libraries and the Property Services Agency - in fact the only people not to be criticised by the National Audit Commission were Wilson and his design team, who provided the only continuity through the project.

Sir Colin St John Wilson (1922-2007), Professor of Architecture at Cambridge University between 1975 and 1989, began his career at London County Council where he collaborated with (Sir) Leslie Martin, among many others, before becoming a lecturer in Architecture at Cambridge in 1956 where Martin was Professor. Wilson and Martin worked together on a number of projects, but Wilson is undoubtedly best known for his design of the British Library, a project of some 30 years duration. A highly influential architect of the post-war period, his renown is attested by 10 of his buildings being designated, including the Oxford University St Cross Library building (1961-5) and Harvey Court halls of residence at Gonville and Caius College, Cambridge (1961-2) both listed at Grade II*. Wilson's principal architect partner was M.J Long (b.1939). M.J. Long studied at Smith College in Massachusetts, and received her MArch from Yale in 1939. She worked for Sir Colin St John Wilson from 1965 to 1996, as a partner from 1974, and latterly a director. She also ran a separate practice (MJ Long architect) from 1974 to 1996.

ALTERATIONS: there have been a number of minor alterations to the Library's fabric, primarily to adapt the facilities to changing needs of the public and to comply with the Disability Discrimination Act (DDA) provisions. These include: - External installation of DDA-compliant ramps and handrails, bollards to external entrances and lighting to the Newton statue and clock tower; - Reading Rooms: altering reading room counters; installing electronic resource desks in the Rare Books Reading Room; converting a shelved storage area on the Lower Ground floor and installing a glass partition in Science 1 Reading Room; - Public realm: installation of automated door openers in public areas to improve access; - Conference Centre: refurbished in 2010, including the recovering of the auditorium seating.

In addition, the British Library have carried out ongoing maintenance and upgrading of office spaces, lifts, lighting, CCTV, fire alarms and access controls.

Details

Public Library, the present design based on that of 1975-8, built 1982-99, though opened in 1997; architect (Sir) Colin St John Wilson, with M.J.Long, Douglas Lanham, John Collier, John Honer and many more. The structural



engineers were Ove Arup and Partners, with mechanical engineering services from Steensen Varming and Mulcahy and quantity surveyors Davis Langdon and Everest. William Lam advised on lighting.

The Conservation Centre: although attached to the rear north elevation (Long and Kentish, 2006), the centre is a separate building and very recent in date. It is not part of the special interest of the Library.

Works of art: some significant internal and external works of art associated with the design of the library, contemporary with its completion and opening, and supported by outside sponsorship are of special interest and included in the listing. Where this is the case, these are specifically mentioned in the List entry. Other free-standing or 'curated' works are not included.

STRUCTURE AND MATERIALS

The building has a concrete frame, based on 7.8m x 7.8m column centres, clad inside and out in red brick (handmade, sand-faced dark Victorian Reds from Leicestershire) laid in stretcher bond, chosen because they were made of the same clay as those used for the adjoining St Pancras Station and Hotel immediately to the east. In a contrasting red to the brick there are metal sills and cornice bands, and cladding to the columns, the latter with stylized classical motifs, and dark green metal fascias to the science rooms, colours inspired by the adjacent St Pancras Station and Hotel. Special stainless steel wall ties allow vertical movement between the series of subframes and the brick skin. There is a granite plinth to the Midland Road elevation, with plaster and panelling contrasted with brick and tile within; external columns are clad in steel. The stepped roofs are slate-covered, again akin to St Pancras Hotel, contrasting with the steel screens shielding the clerestory glazing. The brick and stone paviours to the forecourt are continued within the building.

Interior joinery throughout is in American White Oak, with maple used only in the Conference Centre. The floor and wall finishes are of Travertine, Portland Whitbed, and Purbeck limestone, with contrasting Travertine and brick paviours on the ground floor of the atrium. In general the door furniture and stair handrails are in brass, the latter over bound with leather, with a bronze structure to the King's Library.

PLAN

The building comprises two main blocks of libraries above ground, linked by a central entrance range, with a large piazza over four tiers of basement stacks on piled foundations, and small additions to the rear. The basement is divided by the tunnels of the Northern and Victoria Lines, with resilient bearings separating the conference centre structure from the Hammersmith and City/Circle Lines. The frontage parallel to Euston Road contains the main entrance and atrium, with the King's Library and restaurants behind; to the west (left) are the humanities, rare books and music libraries; to the east (right) the science and patent libraries adjoin the conference centre (with its own entrance) parallel to Midland Road, making an acute angle, with a vertical clock tower containing service shafts between the west block and entrance range. Additional public and staff entrances are along Midland Road.

EXTERIOR

The south elevation facing the piazza includes the main ENTRANCE. Steps lead to the sliding entrance doors, set at grade under a canopy with a display window to the gift shop to the left; the ramp to the right of the steps was constructed in 2014. To the left (west) of the entrance, each panel of the five-bay, four-storey frontage (housing internally the exhibition rooms and shop), has two metal roundels, above which is an additional step and clerestory to the roof. The western block is itself divided into two six-bay blocks, each of six bays, to the west with double-stepped pitched roofs, and a flat roof to the raised set-back block in between.



A ten-bay block to the east (right) rises to six main storeys with staff facilities behind, its height determined in relation to the hotel and station across the road to the east; panels of brushed metal sun shields are repeated on the east and west elevations. The CLOCK TOWER rises above the junction between the east block and the stepped roofscape of the entrance. The clock near to the apex faces south with stepped brick and red metal detailing above. Feature spotlighting added to the base of the clock tower in 2014 is not of special interest.

The CONFERENCE CENTRE adjoins seamlessly to the south, its entrance at the forecourt elevation, with a large porthole opening above to light the stairs within, and its raked pent roof-line presenting a bold face to Euston Road, broken by two bands of projecting triple-glazed fenestration with sun screens at the south-east corner. To Euston Road, a modest kiosk café and an undercover ramp (added in 2010) that leads through to the piazza are not of special interest. On the Midland Road elevation a colonnade, with metal railings in between, rises from a Royken granite plinth and supports the projecting and stepped east wing above with long strip windows defined by louvred metal sun screens and interrupted by a projecting 'V'-shaped staircase 'oriel' window; the soffit is coffered. The north elevation has landscaped roof terraces incorporating a circular pergola and a projecting stair tower.

The rear (north) elevation was intended by Wilson to allow for further phases of building (see history above). It has a series of stepped terraces repeating the same idiom of brick panels and paviours, with planters and a square-patterned trellis and balustrade somewhat reminiscent of Frank Lloyd Wright. There is a broad public terrace with planting boxes leading out from the large staff restaurant, which has a fully-glazed facade shielded by metal screens; above it is an enclosed terrace, including a circular pergola surrounding fixed wooden seating.

The west elevation (to Ossulston Street) and rear elevation of the western block is supported on red columns with deep bracketed eaves and has a stepped roof; an external circular escape stair for the humanities reading room, constructed with radial bricks, is attached to the rear.

Despite the contrast of square and diagonal, the structure of the two blocks is on a strong square grid, reminiscent of that which governs Wilson's nos. 2 and 2a Granchester Road, Cambridge (a pair of houses of 1961-64, one of which with a studio for himself, listed at Grade II, NHLE ref 1392069), and which appears in details such as coffering, doors and screens, the supports of the uplighters, glazing, grilles and trellises. Common ingredients are set out in Stonehouse (2007).

PIAZZA, PORTICO AND EXTERNAL ARTWORKS

To the south (front) of the main entrance is a forecourt known as the piazza with brick paviours set within a grid of limestone slabs that includes steps, raised levels and a rotunda defined by walls topped with granite boulders at the entrances; Sir Antony Gormley's 'Planets' installation of 2002, noted but at the time of the inspection (2015) but is not part of the special interest of the building. There are flag poles and a temporary, free-standing café on the piazza; neither the café here* nor other cafes* within the building's envelope, or the flagpoles* are included in the listing. DDA compliant handrails have been added in a number of places and are not of special interest. A raised plinth at the point of intersection between the main south and angled, ramped south-eastern entrance incorporates Eduardo Paolozzi's Newton (after Blake), installed in 1995, an integral part of Wilson's composition and made by the Morris Singer Foundry with raised planting behind. Feature lighting for Newton, with an associated plinth made by East Coast Casting, was added in 2014 and is not part of the special interest of the building. To the south on the Euston Road entrance, the square brick entrance gateway, known as the Portico, forms a rectangular frame to an angled entrance, with a stone panel incised with the name 'The British Library' repeated in the pattern of the iron gates and their high overthrow, by David Kindersley and Lida Cardozo.



The bronze chair, Witness, by Sir Antony Gormley, installed in 2011, is noted but is not part of the special interest of the building.

INTERIOR

The interior of the Library combines quiet, top-lit reading rooms in the west and east blocks joined centrally by a complex space of multiple entrance concourses arranged in terraces organised with the King's Library at the core.

Freestanding furniture throughout is noted because it was designed by the architects (with Reading Room chairs by Ron Carter) but cannot be included in the listing. Fixed furniture is included in the listing unless stated otherwise.

Interior artworks: the British Library retains numerous works of art as part of their collections, some of which are displayed within the building. However, for ease of their curation, and in recognition that they may be donated items, these works of art* are not included in the listing, although purpose-built architectural elements for housing them may be included and will be specified.

PUBLIC REALM

Entrance and catering areas: bronze sliding and double entrance doors lead to a low vestibule with shop and exhibition halls to the west (left), from which stairs rise to an atrium on four main levels with galleries reached off dog-leg stairs to left, a ramp and a more dramatic spiral stair to right, set behind stairs to the lower ground and a low fountain. Travertine columns contrast with Portland limestone floors in two colours; internal porthole openings light the spaces to the right. The cyma curve roof incorporates clerestory glazing with top lighting to the rear and inset spots; the hanging lights are by Juha Leviska. The central control desk divides access to this main space into two. The main foyer at ground level is defined by built-in seating and balustrading of travertine, with plant troughs. A bronze chair* by Gormley, was installed on the ground floor c.2012 but is not part of the special interest of the building.

The lower ground floor has travertine columns, beams, dado and lift surrounds (as repeated in the rest of the building), limestone and brick paviour floors. The cloakroom has a sinuous counter * and banks of oak lockers* are attached to the walls; these are not included in the listing. Access to offices lie through double doors to the left. Fixed sculptures integral with the building are Anne Frank by Doreen Kern was installed in this location in 2003 and is not of special interest. Paradoxymoron is a painting of 1996 by Patrick Hughes. The reconfigured education space* on this floor is not included in the listing.

To the centre of the ground floor are sets of escalators next to the stairs of limestone with Travertine balustrades leading to the Upper Ground Level and Level 1; handrails – like the door handles – here and through the building are wrapped in leather with brass curves, inspired by those of Gunnar Asplund and Alvar Aalto. In the lift lobby at Upper Ground Level is a model * of the Library set on a plinth*, cut to reveal the basement stacks below the piazza, which is not included in the listing.

There is much art on display in the entrance atrium. A wall tapestry, conceived as part of Wilson's original design, based on R. B. Kitaj's If Not, Not, made by Edinburgh Weavers was moved to the side of the front entrance in 2013. A statue of Shakespeare* (a replica based on that by Roubiliac 1758) stands to the left of the stairs to the west wing above a stepped, inscribed plinth marking the opening of the Library by Queen Elizabeth II on 25 June 1998. On the west wall of the atrium, four busts* in red steel roundels of the donors to the collections (Sir Thomas Grenville, Joesph Banks, Sir Robert Cotton and Sir Hans Sloane) are also replicas. The statue of Shakespeare* and



busts of the donors* are noted because of their prominence in the atrium but are replicas and are not included in the listing although their architectural plinths are included.

Banks of lifts serve the two sets of reading rooms either side of the atrium, the lobbies of which have travertine detailing and limestone borders to the carpeted floors. All carpet* is of standard contract range and not included in the listing. All lifts* in the library are utilitarian and are not included in the listing. Other balustrading is formed of simple steel uprights with a brass top rail. There is built-in bench seating within travertine walls, and black fossil limestone paving to the rear gallery serving the cafe at Upper Ground Level, with kitchen and staff restaurants behind on Level 1, separated by oak doors and louvres. The fixtures* and fittings* of all catering areas, restaurants and lounges for both public and staff use, including seating*, counters*, vending equipment and kitchen equipment*, are not included in the listing.

A belvedere at Level 1 gives views across the foyer. Two more floors above this level have walkways and balconies at the rear over the entrance to the servery. A corridor, with a built-in travertine seat, leads to the staff restaurant and outside terraces for staff and public, including the pergola garden. Limestone floors also serve the lower restaurant area, the stair to which has a built-in travertine handrail and inset lights; there are travertine stall risers to the servery.

Exhibitions: at the Upper Ground floor of the western range, beneath the Rare Books Library, is the Sir John Ritblat Gallery, a permanent display of the 'Treasures of the British Library', with a central service core and concrete columns with afromosia veneer coating. Here there is a combination of free standing temporary cases which not of special interest and, attached to the enclosing walls, permanent cases contemporary with the building. Stairs lead down to the Paccar Gallery for temporary exhibitions, which partly underlies the 'Treasures' exhibition, with access points from both the Ground and Lower Ground floors; the wall partitions in the Paccar exhibition and the stairs between the Paccar and Treasures exhibition spaces* are functional and do not form part of the listing. The adjacent exhibition workshops* are classed as office areas and are not included in the listing. Stairs with travertine risers and steel and brass handrails lead down from the ground floor to the Paccar Exhibition space but beyond this point the exhibition partition walls*, fixtures* and fittings* are temporary, not fixed and not included in the listing. At the Upper Ground floor, to the rear of the foyer, is a temporary exhibition area, again with free standing fittings, masking the view of the King's Library at this point; the exhibition panels* and structure* are not included in the listing because of their temporary nature.

Shop and Box office: flanking each side of the atrium's ground floor, both the shop* and box office* have C21 shop fronts* and fittings* and are not included in the listing.

Reader Registration* is a remodelled office area at Upper Ground level which is not included in the listing. Toilets* for staff and public throughout the building are utilitarian and are not included in the listing.

READING ROOMS AND THE KING'S LIBRARY

There are 11 reading rooms in total, divided broadly into humanities on Levels 1 to 3 in the west block, fronting Ossulston Road, and science in the east block on Levels 1 to 3, fronting Midland Road.

King's Library: rising in the centre of the building behind the foyer, the King's Library is accessed from a bridge over a narrow 'moat' at the Upper Ground floor through heavy bronze double doors. It is a six-storey glazed casket, served by an internal lift and escape stairs, with an independent structure comprising a bronze framed curtain wall set within a trough or moat, travertine walled with a glass balustrade and black marble base. Wilson described it (1998, references below) as 'an object in its own right ... simultaneously a celebration of beautifully bound books, a towering gesture that announces the invisible presence of treasures housed below and a hard-



working sources of material studied in presence of treasures houses below and a hard-working source of material studied the Rare Book Reading Room opposite: the symbolic is at one with the use'. The books are placed on outward-facing shelving as close to the glass as is feasible, on stacks which move inwards while allowing air movement for the preservation of the books, so that the bindings can be enjoyed. Subtle lighting within alternate mullions inside the cases highlights the bindings. At the centre are fixed stacks. There is a bust of George III* by Peter Turnerelli,1812 on a black marble plinth, of note, but not included in the listing.

Humanities Reading Room: access to the Humanities Reading Room is at level 1 in the west block. This lofty, triple-height and essentially square space, receives generous daylight through rooflights and clerestories with a coved ceiling sweeping up to the top-floor clerestory. Inserted on two sides are the two projecting and stepped upper floors, enclosed by giant square piers accessed by internal timber-lined stairs; the third being the map room. The piers are panelled to shoulder height in American White Oak incised with delicate lines, imitating fluting; all timber detailing used for the balustrades, desks and wall shelving and joinery is American White Oak. The pierced oak balustrading to the upper floors has elongated stanchions, repeated as a vertical motif in the cornice that makes a feature of the air ducts and lighting troughs below, and countered by the multiple vertical shafts of the up-lighters; the built-in oak desks have square patterns incorporating lights and sockets, and brushed black steel built-in lights. Other finishes are in impact-resistant, glass reinforced gypsum (GRG) rather than plaster, for ease of maintenance, plain or sparely detailed with stylized classical motifs with Japanese overtones. All these square and vertical patterns have sources in Frank Lloyd Wright, whose Robie House Wilson particularly admired. This plan form derives from that of Leslie Martin's Law Library at St Cross, Oxford, designed in association with Wilson and built in 1959-63. The Control and issue desks match the American White Oak panelling and shelving of the walls, and like the desks and chairs are by the architects. The chairs are not fixed, thus are ineligible for listing, but the reading desks, with leather tops, mostly are; some are modified for DDA compliance, others altered to take computer processor units with additional electrical supply for lap-tops.

Adjacent to Humanities is the Rare Books and Music Reading Room, with the Manuscript Reading Room on the single balcony above. The details here are repeated on a more modest scale, with conoid-topped columns and flatter slopes to the ceiling. Carrels or sound booths against the perimeter wall are built in to the music library, originally, it is said to accommodate those wishing to use portable type writers; the film reader room is alongside. Doors throughout the reading rooms are of American White Oak with brass and bound leather handles, glazed to the booths and film-reader room.

Science Reading Rooms: the eastern block housing the science and social science collections is on three floors, topped by a coffered ceiling that is upswept to the top of the main windows, with a balustrade protecting the ducting below. On the other side are two stepped back galleries with broad timber ledges topped by brass handrails. To the street (Midland Road) it has large, continuous side windows, with in between carrels, desks and a connecting stair with glass balustrades. There are more bookcases for material on open shelves than is found in the humanities libraries; those in freestanding, moveable units* are not included in the listing. There are broad timber ledges to the balconies. Control and issue desks match the oak panelling and shelving of the walls, and like the tables and chairs (not fixed, and the same as those in the humanities reading rooms and not included in the listing) are designed by the architects. Some additional internal glass partitioning was added in 2012 and is not of special interest.

Business and IP Centre: on Level 1 of the east block, formerly a science reading room, the Business and IP Centre has a modernised entrance foyer and inserted glass meeting rooms; the foyer and meeting room partitions* are not included in the listing. The high windows are over-built in shelving and a single gallery whose balustrade is lined in timber (former Science North reading room), linked by a spiral stair (also with a timber balustrade) and with shelving on both levels. Ducts form a cornice, the square columns are timber lined to dado height, and there are built-in desks, not all with reading lamps; the wall shelving is lit with downlights.



Newsroom: on Level 2 in the east block, the newsroom created from a former science reading room in 2014, has a reconfigured foyer* and renewed fixtures* and fittings* and a digital screen* installed. It is not included in the listing.

Asian and African Studies Reading Room: on Level 3 in the east block, formerly the Indian Office Library, is a double-height space so that the historic picture collection can be hung. The fittings are similar to those in the other Reading Rooms.

OFFICES AND BASEMENT

The staff offices are located to the rear of the east and central blocks, the principal entrance being the staff entrance gate (gate 8) from Midland Road. The offices* are adaptable spaces with standard furniture*, fixtures* and fittings* and are not included in the listing with the exception of the 4th Floor Executive office which is included in the listing as a representative example.

Access to the reading rooms and public realm is via stairs to the rear and lifts; there are no notable fixtures and fittings here except for the carved, timber war memorial to all Library Association librarians from the Commonwealth lost in the First and Second World Wars which is fixed to the wall opposite the main lifts to the science reading rooms and is included in the listing. At the rear also is the staff restaurant with timber dado repeated in the maple battens fixed to the bases of circular columns and hanging lights by Louis Poulsen. On Level 4 of the east block is the Board room and its adjacent Executive Office suite, a 'staff' area with meticulous travertine and American White Oak finishes; the Board room furniture is by Ron Carter and where fixed is included in the listing.

Beneath the piazza are four vast basement floors* with overpainted brick walls, mechanical and motorised stacking and secure pens for rare and valuable items. On Basement level two is the control room for the Mechanical Book Handling System (MBHS), a bespoke conveyor belt system transporting items in trays to and from the basement to the reading rooms' service desks via lifts. As part of the integral design of the Library the basements and MBHS are noted here, but none of the basement levels*, their fixtures and fittings* are included in the listing. Collection item storage areas* on other floors, including large areas of the Lower Ground Floor, Manuscripts and Philatelic Storage Rooms are not included in the listing.

Loading bays*, plantrooms*, cores*, lift-shafts*, and other utility and service areas* are not of special interest and are not included in the listing.

CONFERENCE CENTRE

Refurbished in 2010, the centre serves the Library and external functions and is entered from the forecourt through bronze doors, with lower and upper foyers, served by a travertine lined stair well, the treads in Purbeck marble and Portland stone. The lift wall and dado are in travertine with limestone floors and maple joinery. There is a 250-seat auditorium accessed on two levels (seating recovered in 2010) and four seminar rooms seating 20-65 people, of these only the double-height Elliott Room is of special interest; the others have standard fixtures* and fittings*. A large foyer with a bar is reached by a broad travertine-lined stair incorporating built-in seating, and leather-bound brass handrails, dubbed the 'Spanish Steps' by Wilson to denote his intention that they be a meeting and conversation place. The toilets* and cloakroom* are not included in the listing.



SUBSIDIARY FEATURES

The entrance adjoins walls to Euston Road and Ossulston Street; the latter has two pairs of set-back gates, the first into the forecourt, the second to the rear of the western wing, and railings set on a low, stone-capped wall with brick piers. The semi-circular planters* to the Euston Road frontage and railings between and including Gate 10 and Gate 9* fronting Midland Road (installed in 2008) are not included in the listing.

* Pursuant to s.1 (5A) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act') it is declared that these aforementioned features are not of special architectural or historic interest.



Appendix C – Pre-Application Meeting Schedule

British Library Pre-Application Meeting Schedule

Date	Statutory Body	Meeting Title/Topic
30 June 2020	Camden	Project Kick-Off meeting
		- Design overview
		 Timetable and pre-application process
10 July 2020	Camden	Second Kick-Off meeting
		- Engagement
		 Knowledge quarter uses
		 Climate emergency
		 Health and wellbeing
		- Transport
18 August 2020	GLA	Project update meeting
4 September 2020	Camden	Sustainability
		 Key sustainability principles and
		policies
		- Intensity of use
		 Renewables, air quality, SUDS,
		biodiversity
9 September 2020	Camden	Public Benefits and Inclusive Economy
10 September 2020	Camden	Public Realm #1
		 Spaces and phases
		- Context
		 Architectural arrangement
15 September 2020	GLA	Briefing/project update
23 September 2020	Camden	Public Realm #2
		- Levels
		 Parking facility requirements
		- Tree planting
23 September 2020	Historic England	Project Update
14 October 2020	Camden	Public Realm #3 part a
		 Public realm principles
		- Character areas
		 Design framework
23 October 2020	Camden	Design Review Panel 1
26 October 2020	Camden	Greening initiatives
9 November 2020	Camden	Strategic Review Panel
		- Presentation of proposals
		- Q&A session
		- Comments
12 November 2020	Camden	Public Realm #3 part b
		- Public realm principles
		- Character areas
		- Design framework
18 November 2020	Historic England	Work in Progress and views scoping
	and Camden	- Architectural update
		- Review of views
18 November 2020	Camden	STEAM and SMBL Developments Ltd
		introduction

Date	Statutory Body	Meeting Title/Topic
18 November 2020	Camden	ES introductory meeting - Scoping project overview - Review of topics to be scoped in and out
23 November 2020	Camden	Planning Update - Engagement strategy - Programme - Midland Road entrance
30 November 2020	Camden	Transport (#1)
7 December 2020	Camden	Climate Emergency - Partnership and collaboration - Inclusive, accessible and healthy cities - Path towards net zero carbon - Biodiverse habitats
11 December 2020	Camden	Viability
14 December 2020	Camden and Historic England	Building Design - Context - Materials under consideration - Façade development - Townscape views - Sustainability leading design
15 December 2020	Camden	Planning Update
13 January 2021	Camden and Historic England	Project update
18 January 2021	Camden	Project history update
20 January 2021	GLA	Viability briefing
29 January 2021	Camden	Social Value
2 February 2021	Camden	Development Management Framework 1
4 February 2021	Camden and Historic England	Views and Townscape
8 February 2021	Camden	Building Design (Ground Floor Meeting) - Library storage space - Level changes - Public realm - Parking - Routes

Date	Statutory Body	Meeting Title/Topic
23 February 2021	Camden	Phoenix Road projects
3 March 2021	Camden	Transport meeting - Parking / drop off - Rejection bay - Maintenance parking
10 March 2021	Historic England	Views workshop - Kinetic views discussion
11 March 2021	GLA	Design and Sustainability meeting
17 March 2021	Camden	Sustainability
6 April 2021	Camden	Building Design: lower levels - Low levels façade development - Landscape - Cycle parking - Lighting
8 April 2021	Camden	Building Design: Foyer Operation
22 April 2021	Historic England	Internal works
27 April 2021	Camden	Young citizen scientists
29 April 2021	Camden	STEAM and Inclusive Economy
12 May 2021	Camden and Historic England	Internal connections
20 May 2021	Camden	Design meeting
21 May 2021	Camden	Design Review Panel 2
25 May 2021	Camden	Development Management Framework 2
27 May 2021	Camden	Design meeting - Views - Elevations - Internal terrace
11 June 2021	Camden	Design workshop
16 June 2021	Camden	Design workshop
21 June 2021	Camden	CIL
5 July 2021	Camden	Daylight / Sunlight
5 July 2021	Camden and Historic England	Level 1 Terrace treatment
8 July 2021	Camden	Viability
20 July 2021	Camden	Developers' Briefing
27 July 2021	Camden	Transport

Date	Statutory Body	Meeting Title/Topic
30 July 2021	GLA	Transport and design update
24 August 2021	TfL	CR2 Overview
2 December 2021	Camden	Planning and initial s106 discussions
20 December 2021	Camden	Planning and initial s106 discussions



Appendix D – Letter, dated 16 March 2017, from the DfT to the British Library.



DCMS 4th Floor 100 Parliament Street London SW1A 2BQ

Baroness Tessa Blackstone (Chair) Roly Keating (Chief Executive) The British Library 96 Euston Rd Kings Cross London NW1 2DB

16 March 2017

Dear Tessa and Roly,

I would like to take this opportunity to thank you and your team for your patience and for providing the necessary information in order to meet HM Treasury's queries about the St Pancras Transformed business case. I am delighted that you are able to move forward with this very important project.

I am pleased to confirm that the Chief Secretary to the Treasury has approved the business case and is supportive of these proposals and its potential to improve the British Library's sustainability, while also supporting the life science sector in the UK and wider economic benefits that this brings. This allows the British Library to drawdown on your reserves in this SR period and then repay your reserves by 2024/25.

This approval is subject to the following conditions being met within the timescales specified to mitigate against fiscal and delivery risks.

- 1. The British Library to provide written agreement to Government (DCMS and HMT officials) before final contracts are signed that they or other parties agree to cover any increased financial cost with no further exchequer impact (the existing drawdown of reserves by the British Library will have a fiscal impact in this SR period). This includes any additional drawdown for their reserves by the British Library and in the event that they are required to cover additional costs associated with Crossrail 2 works or local housing contributions.
- 2. The British Library to implement the recommendations made in the IPA Gateway Review delivered on 9 February 2017, and agree to a further Gateway Review in early 2018 and Gateway 3 Review at the point at which granting of planning consent is imminent. One of these should include the provision of quantified costs for Crossrail 2 liabilities for review as soon as is possible. These reviews will also allow for IPA to review final contracts, which should provide confirmation that all liabilities regarding the financial risks associated with Crossrail 2 are to be transferred to the developer, Stanhope, and agreed by all parties involved.

3. The British Library to provide further evidence to Government (HMT, DCMS and IPA officials) confirming the financial viability of plans after final costs and terms of Crossrail 2 and social housing contributions have been agreed, and within 30 days of this agreement. If this subsequent analysis reveals that the project is no longer deemed financially viable for the British Library should any of these financial risks materialise, the project should no longer continue.

I would be grateful if you could acknowledge receipt of this letter and the outlined conditions by Thursday 22nd March, detailing any immediate actions you will now take to ensure these conditions are met. DCMS will then work with you to make an announcement about this very positive result and exciting project. It would be helpful if you could liaise with Dominic Lake and Imogen Block accordingly.

With best wishes.

Yours sincerely,

David Rossington

Acting Director General

DISABLE STA