



HS1 Limited
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Kings Place
90 York Way
London
N1 9AG

Jennifer Walsh
London Borough of Camden
5 Pancras Square
c/o Town Hall, Judd Street
London
WC1H 9JE



3rd May 2022

Dear Jennifer,

Demolition of the British Library Centre for Conservation, alterations of the British Library and erection of a new building of 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 including new crossovers; provision of Crossrail 2 infrastructure; means of access; and associated works.

Land to the North of the British Library 96 Euston Road London NW1 2DB

Ref 2022/1041/P

Introduction to HS1

HS1 Ltd holds the concession from the Government to operate, manage and maintain the High Speed railway infrastructure (until December 2040) between St Pancras International Station in London and the Channel Tunnel. The railway forms the United Kingdom part of the international high speed passenger railway route between London and Paris, Brussels and other destinations operated by Eurostar. The 109 km railway is also used by freight traffic and high speed domestic trains, operated by Southeastern (serving Kent) and East Midlands Railway (serving the Midlands).

The railway infrastructure and its stations are held by HS1 on a lease from the Secretary of State for Transport. As part of this undertaking, HS1 operates St Pancras International Station, (the international UK terminus for HS1) and Grade 1 listed building which has the potential to be significantly affected by the British Library /Crossrail 2 proposals included within this application.

Finally St Pancras International is also home to Thameslink services, which pass in tunnel under the station, the tunnel infrastructure is also owned by SoSfT but is leased to Network Rail Infrastructure Ltd.

HS1 Response

HS1 is supportive of the principle of the British Library extension and welcomes the ambition for the site and the increased activity that this will bring to the surrounding area. However we continue to have considerable concerns regarding the safeguarded Crossrail 2 connection and the fact that these proposals "set in stone" any future station entrance proposals without a proper consideration of the impacts. We would like to draw the following concerns to your attention;



1. Impact on St Pancras International Station/Midland Road – Infrastructure/commercial interests

Whilst HS1 welcomes the ambition of TfL to create an Eastern Crossrail 2 station entrance at St Pancras International Station, we have concerns about whether this can be achieved in the location identified by the current proposal. We have engaged with both TfL and the British Library over a number of years to express our concerns regarding the eastern entrance, however we do not believe that the current application adequately addresses the issue.

The submitted proposals safeguard a route under the proposed library extension, but do not show how the station entrance will actually be accommodated if it were ever to be built. We know from our own previous discussions with TfL, that the Thameslink Tunnel running under Midland Road and St Pancras Station, together with the foundations for the St Pancras Hotel would prevent an underground connection directly into St Pancras station. The proposed future solution therefore relies on the construction of a new surface level box structure within the width of Midland Road at ground level with a station ticket hall under the road surface, however none of this detail is included within the current application.

The Local Planning Authority has therefore no way of assessing whether or not this structure will be acceptable in terms of its impact on Highway capacity, pedestrian legibility, cycle way provision and heritage impact on the surrounding Grade 1 listed buildings. Should any one of the above issues be an obstacle to the delivery of the station entrance then the safeguarded tunnels under the British Library will have been in vain and it would be too late to consider alternative proposals.

HS1 strongly believes that Camden Council must assure itself, that an acceptable Crossrail 2 station entrance can be accommodated in Midland Road without impacting on pedestrian, cyclist or highway safety and without compromising the setting of a Grade 1 listed building. This assurance must happen now before this application is determined to ensure that an acceptable solution is safeguarded, it will be too late in 10 years time to conclude that the solution that today's safeguarding suggests is not considered acceptable by the Council or other Stakeholders.

2. An Alternative Approach

HS1 has long advocated that an alternative approach should be adopted by TfL and the applicant, which would negate the need for a future structure in Midland Road adjacent to St Pancras Station and would have no impact on the pedestrian, cyclist and highway capacity of Midland Road.

HS1 has proposed on several occasions that the new eastern Crossrail 2 station entrance should be incorporated into the ground floor of the new British Library extension. Passengers would be able to exit the Crossrail 2 station onto the public plaza in front of the British Library extension and simply cross Midland Road using the existing wide pedestrian crossing. Passengers would then enter St Pancras International Station through the existing entrance by the Thameslink gatelines.

This approach would bring footfall and activity to the Midland Road area, support ground floor functions of the new development whilst at the same time have no impact on the capacity of Midland Road. TfL have said that there would be safety concerns regarding people having to cross the road, however we cannot see that this is a barrier to delivery especially when there is such a large pedestrian crossing over Midland Road. The proposed approach could have the opposite impact in that it could endanger pedestrians and cyclists through the reduction of Midland Road width and capacity.

3. Protecting our asset

The proposed development is located close to several sensitive HS1 receptors most importantly the Thameslink Tunnel box under Midland Road which will be around 10.5m from proposed excavations and the Grade 1 listed station structure. Should approval be granted for this development then we request that the attached conditions (please see appendix A) are applied to any consent. These are in order to protect our assets from the construction process and to ensure that there is limited impact. The HS1 Safeguarding Directions 2018 require that the Local Planning Authority apply any conditions requested by HS1 to the consent unless you have consulted with the Secretary of State for Transport. We would be happy to discuss the precise wording of these with yourself and the applicant.



We would also expect the applicant to enter into a Protective Provisions Agreement (PPA) with HS1 to ensure that necessary safeguards are in place to control the impact of the development.

4. Heritage Impact

St Pancras International Station is a Grade 1 listed building of the highest importance to the nation. The Local Planning Authority needs to assure itself that the scale and massing of the proposed development will not be detrimental to the setting of St Pancras International Station. We are concerned that the building could overshadow the Grade 1 listed building and therefore diminish its setting and historical context.

If you require further information or clarification, [REDACTED]

Yours sincerely

[REDACTED]

Ben Olney
Planning and Consents Manager, HS1 Limited

Appendix A



Network Rail (High Speed) Asset Protection

Response to planning consultation

Address:	Land to the North of the British Library 96 Euston Road London NW1 2DB		
LPA:	Camden		
Planning ref:	2022/1041/P	Our ref:	OP-5000#5304
Date of this response:			

IMPORTANT — Please note that under the HS1 Safeguarding Directions 2018, the LPA, should it not wish to apply any objections or conditions requested by HS1, must

Further information including the Directions, plans and Guidance Notes for LPA's can be found [here](#).

REMINDER: HS1 only comments on our own railway assets. Therefore, any applications near to Network Rail assets should be forwarded to [\[redacted\]](#) and your AsPro contact.

Required Conditions

1. Foundation design

Condition: Prior to the commencement of development, details of the design of the foundations and other works proposed below existing ground level shall be submitted in writing and approved by the Local Planning Authority in consultation with HS1. Construction activity shall then be carried out in compliance with the approved details unless previously agreed in writing by the Local Planning Authority in consultation with HS1.

Reason: To ensure that loads on, and settlement of, HS1 tunnels, structures, track and other infrastructure do not prejudice the safety or operation of HS1.

2. Construction activity safety

Condition: Prior to the commencement of development a construction phase/management plan shall be submitted in writing and approved by the Local Planning Authority in consultation with HS1. The plan shall include but not be limited to:

- Control of windblown debris, dust and materials
- On-site vehicle movements and parking, including any temporary errant vehicle protection
- Site layout arrangements
- Site security and fencing arrangements.
- Safeguarding of ALL buried services
- Storage of combustible/hazardous materials
- Position and operation of cranes and other plant
- Details of any excavations and stockpiles.

Construction activity shall then be carried out only in compliance with the approved method statement unless previously agreed in writing by the Local Planning Authority in consultation with HS1.

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Reason: No such information has been provided and is required in order to manage the risk that the construction activity presents to the safety, security and operation of HS1.

3. Site investigations near to HS1 (either above tunnels or adjacent to railway assets)

Condition: Prior to the commencement of site investigations involving a borehole or trial pit deeper than one metre, details of the location and depth of site investigations including a method statement shall be submitted in writing and approved by the Local Planning Authority in consultation with HS1. This activity shall then be carried out only in compliance with the approved details unless previously agreed in writing by the Local Planning Authority in consultation with HS1.

Reason: No such information has been provided and is required in order to ensure that the borehole or trial pit is at an acceptable vertical and horizontal distance from tunnels, the operational railway or other assets as advised by HS1 so that it does not compromise the integrity, safety or operation of HS1.

4. Demolition

Condition: No demolition activity shall take place until the proposed methodology has been submitted in writing to and approved by the Local Planning Authority in consultation with HS1. Demolition activity shall then be carried out in accordance with the approved details unless the Local Planning Authority in consultation with HS1 has previously agreed in writing to any change.

Reason: No such information has been provided and demolition activity could pose a risk to the safety, security and operation of HS1.

5. Excavations

Condition: Prior to the commencement of any construction activity engineering details of the size, depth and proximity to HS1 of any excavations shall be submitted in writing to and approved by the Local Planning Authority in consultation with HS1. Excavations shall then be carried out in accordance with the approved details unless the Local Planning Authority in consultation with HS1 has previously agreed in writing to any change.

Reason: No such details have been provided. To ensure that the stability HS1 tunnels, structures, track and other infrastructure is not prejudiced.

Informative: If the excavation is within the zone of influence of HS1 infrastructure an engineering design will be required from the developer for approval in advance of excavation.

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6. Imposed loads

- Condition:** Prior to the commencement of any construction activity, details of the size, loading and proximity to HS1 of additional ground loads such as stockpiles shall be submitted in writing and approved by the Local Planning Authority in consultation with HS1. Works shall be carried out in conformity with the approved details unless the Local Planning Authority in consultation with HS1 has previously agreed in writing to any change
- Reason:** To ensure that the stability of HS1 tunnels, structures, track and other infrastructure is not prejudiced.
- Informative:** If the stockpile is within the zone of influence of HS1 infrastructure an engineering design will be required from the developer for approval in advance of excavation.

7. Vibration

- Condition:** Prior to the commencement of any construction activity details of the plant and equipment proposed which are likely to give rise to vibration (such as pile driving, demolition and vibro-compaction of the ground) together with predicted vibration levels, shall be submitted in writing and approved by the Local Planning Authority in consultation with HS1. Activities likely to cause vibration in the vicinity of HS1 infrastructure such that a peak particle velocity (PPV) of 5mm/s may be exceeded at the railway boundary will be subject to agreement in advance.
- Where activities could give rise to PPV of 5mm/s or greater, a vibration and settlement monitoring regime shall be submitted in writing to for approval by the Local Planning Authority in consultation with HS1. It shall be put in place prior to the start of works. HS1 shall be provided reasonable access to the results of monitoring
- Reason:** No details of vibration have been provided. To ensure that vibration does not prejudice safety, operation and structural integrity of HS1.

8. Dazzle, glare and distraction from solar reflection

- Condition:** The development shall be so designed to avoid dazzle and glare from solar reflection which could cause hazard or distraction to operators of HS1. Prior to the commencement of development the reflectivity and the orientation of specular (i.e. polished) reflective surfaces such as glazing or non-matt metal shall be submitted in writing and approved by the Local Planning Authority in consultation with HS1. Unless otherwise agreed in writing with the Local Planning Authority in consultation with HS1, the approved scheme shall be implemented.
- Reason:** Depending upon the orientation of the façade or component and the position of the sun, specular reflection can interfere with sighting of signals

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and compromise the safe operation of HS1. No detail of the potential for this has been provided.

9. St Pancras Station and Thameslink Box HS1 assets

Condition: As Shown in attached drawing 014-HS1-1D000-00201-00, the applicant is reminded that St Pancras Station (opposite on Midland Rd) and the Thameslink Station box (beneath Midland Rd) forming part of the railway is located adjoining the site. Prior to the commencement of development, a risk assessment should be carried out to identify the risks of the malfunction or failure of any part of the construction or permanent development to this asset, with particular attention to loading. Appropriate mitigation to manage these risks should be incorporated into the development and the details submitted in writing and approved by the Local Planning Authority in consultation with HS1.

Reason: No assessment has been undertaken to identify the risks, if any, and no mitigation has been provided. The development should take into account residual risks arising from HS1.

Informatives

10. Further consultation and agreement

Informative: The Developer shall enter into discussions with HS1 and their Engineer, Network Rail (High Speed), as soon as practicable to assist in identifying the likely effect of the development on HS1 or HS1 Property.

Contact: HS1 Ltd
5th Floor, Kings Place, 90 York Way, London, N1 9AG

Reason: The nature of the proposed development is such that detailed discussion is required concerning the design, construction, future maintenance and demolition of the development to ensure that it does not compromise the integrity, safety, security, operation, maintenance and liabilities of HS1.

11. Protective Provisions Agreement (PPA)

Informative: The developer is expected to enter into a PPA with HS1. This is a legal agreement between HS1 and the developer covering safeguards, processes, responsibilities, and cost recovery.

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Reason: The nature and scale of the proposed development is such that detailed discussions, agreements and indemnities are required in respect of the design, construction, and future maintenance of the development in order to protect HS1.

12. Costs incurred

Informative: The developer shall agree to pay the costs incurred by HS1 and Network Rail (High Speed) in reviewing and approving the development.

Reason: Costs to be incurred from a development reside with the developer.

13. Noise

Informative: The developer is reminded of his obligation to ensure appropriate mitigations are adopted to protect the development from noise from HS1.

Reason: The developer is responsible for ensuring that the development meets statutory requirements.

14. Covenants

Informative: The applicant is reminded that covenant(s) may apply to the site covering the following issues:

- land/property use
- discharge of drainage
- electromagnetic radiation
- use of plant and other equipment
- landscaping
- construction
- demolition
- changes to, location of, and management of, vegetation
- changes or additions to all structures
- fencing
- storage of goods, refuse or other materials
- activities within the maintenance strip.

Reason: The covenant has been entered into with the owner or previous owner of the land in order to protect HS1.