



Email: Jennifer.Walsh@Camden.gov.uk

04 May 2022

Dear Jennifer Walsh

RE: 2022/1320/L & 2022/1041/P

The British Library (Land to the North of the British Library), 96 Euston Road, London

Thank you for consulting the Twentieth Century Society on the above applications for Listed Building Consent and Planning Permission for the “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.” The Society objects to the application due to the harm caused to the fabric of the Grade I listed British Library and due to the total loss of the British Library Centre for Conservation (BLCC) which has been identified as a Non-Designated Heritage Asset (NDHA).

Background

The British Library (BL) was built between 1982 and 1999 by Sir Colin St John (‘Sandy’) Wilson and M.J. Long, amongst others. The BL was Grade I listed in 2015 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”, its The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

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historic interest as “a landmark public building”, and as “a major work by the eminent architect and academic Sir Colin St John Wilson and his architectural partner, M.J. Long”.

Around 6 years after opening, M.J. Long returned with the architect Rolfe Kentish to extend the library, working with Sir Colin St John Wilson, who was acting as consultant. The British Library had always envisaged such expansion and the BLCC was the first extension to the library since its completion. The BLCC was designed in 2003-5 and constructed in 2005-7 and was built to provide a world class facility for all aspects of book conservation including education and training and to house state-of-the art technical facilities for the National Sound Archive. It brought together for the very first time all of the library’s conservation staff and facilities which, until then, had been spread across London sites. The BLCC was carefully planned and equipped to accommodate these specialist functions. While it was important that the BLCC had its own architectural identity, it also needed to be subservient to the BL. It is L-shaped, steel-framed building faced with red brick—matching that on the BL but subtly different in its flush rather than recessed pointing—with oak cladding and trellises, metal-framed windows and a glazed ‘saw-tooth’ roof. The Architects’ Journal described the BLCC as “humble, almost primitive” in comparison with the “big, bold and rhetorical” forms of the library (2007). The BLCC is connected to the BL via a specially-built public terrace (playfully called “the acropolis”) at first floor level and by way of a covered corridor at the lower level.

Comments

The British Library is designated Grade I. Just 2.5% of listed buildings are Grade I and very few date from the post-war period. As a building of exceptional interest, great weight should be given to its conservation. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority [...] 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 National Planning Policy Framework

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(NPPF, 2021) includes paragraph 199 which states that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” Paragraph 200 states that “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of [...] b) assets of the highest significance, notably [...] grade I and II* listed buildings [...] should be wholly exceptional”.

The Society does not object to the principle of extending the library. However, we have serious heritage concerns about the approach proposed. We are particularly concerned about the way the extension would impact on the library’s north elevation and would involve the demolition of the circular stair drum and connecting glazed bridge. The Society feels that the significance of this elevation and design feature has been understated. We object to its loss and maintain that it would be possible to revise the scheme to better conserve this façade.

The Society considers the BLCC to be an integral part of the BL and called for its listing in 2021. While the BLCC was turned down from listing and a Certificate of Immunity (COI) from listing issued, Historic England concluding that the building fell short of “the very high standard required for listing” buildings under 30 years old, the notification report acknowledged that the BLCC was an intelligent response to a challenging brief and has design merit as “a finely detailed, contextual addition to one of the most significant post-war public buildings in Britain”, designed by key members of the British Library’s original design team.

The BLCC should be treated as a Non-Designated Heritage Asset (NDHA) and should, in our view, be included on Camden’s local list. The NPPF states that local authorities should take into account desirability of conserving heritage assets and putting them to viable uses consistent with their conservation for the benefit of communities (paragraphs 189 and 197).

Paragraph 203 states that “In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

The current application would result in the total loss of this Non-Designated Heritage Asset. We appreciate that the position the BLCC occupies on the site makes it difficult to accommodate while expanding further northwards. However, we maintain that this would be possible and believe that every effort should be made to conserve this important addition to the British Library. We urge the applicant to rethink the scheme to retain the BLCC.

For the reasons outlined here, the Society objects to the applications, maintaining that the scheme contravenes key national policies concerning the conservation of heritage assets. We urge the local authority to refuse Listed Building Consent and Planning Permission.

We hope that these comments are of use to you. Please do not hesitate to get in touch if the scheme is amended or if you require further advice. We would be grateful if you could please inform us of your decision on these applications.

Yours sincerely,



Coco Whittaker

Caseworker

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

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