



Ms Jennifer Walsh  
London Borough of Camden  
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Direct Dial: 0207 973 3777

Our ref: L01477193

5 May 2022

Dear Ms Walsh

**Arrangements for Handling Heritage Applications Direction 2021  
& T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**THE BRITISH LIBRARY (LAND TO THE NORTH OF THE BRITISH LIBRARY) 96  
EUSTON ROAD LONDON NW1 2DB  
Application Nos 2022/1320/L & 2022/1041/P**

Thank you for your letters of 29 March 2022 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

**Historic England Advice**

This response relates to both the planning and listed building consent applications. Please note that our proposed letter of direction (attached) sets out a number of conditions that should be placed on any grant of listed building consent. Those conditions have been directed in recognition of the high heritage significance of the site and the need to ensure that the works are of appropriately high quality.

**Summary**

Historic England has been involved in pre-application discussions for some time regarding these proposals and we are pleased to see that many of our comments have been taken on board in the submitted scheme. As set out below, we nonetheless consider the proposed extension and associated works to the library would cause some harm to the significance of the Grade I listed library and the setting of other heritage assets in the local area. We acknowledge the efforts that the applicants have made to mitigate that harm, particularly in relation to wider townscape views and the setting of the Grade I listed St. Pancras and King's Cross Stations, and we are satisfied that through this process the harm has, wherever possible, been avoided. We recommend that in making its decision on these applications the Council



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should weigh the remaining harm against any public benefits arising from the proposals, in accordance with policy 202 of the National Planning Policy Framework.

## Historic England Advice

### Significance

The library is of outstanding architectural significance and is an iconic example of modernist design. The lead architect was Sir Colin St John Wilson, who worked alongside his partner MJ Long to deliver the library from start to finish over its 30- year construction. Wilson was an eminent and well-respected architect of his time and designed a number of buildings that are widely celebrated, some of which receiving listed status. He took influences from other leading modernist architects, including the Finnish architect, Alvar Aalto, who designed many renowned civic buildings, such as the Vyborg Library. Aalto sought to make the internal spaces of his buildings friendly, bright and inspiring for learning and his influence is clear at the British Library.

The library is located adjacent to the King's Cross Conservation Area and is in close proximity to the Grade I listed iconic 19th Century railway stations of St. Pancras and King's Cross, and the Grade II listed 20th Century Levita House to the west.

The library was designed by Wilson in recognition of this significant historic setting. Its massing is clearly contextualised, rising in height from west to east and taking clear design cues from the architecture of St. Pancras with a responding form that wraps around a forecourt piazza area, use of complementary red brickwork to the elevations, and crowning clock tower feature. In many local views, the modelling of the library ensures that it is a relatively discreet building, as it is generally screened from view by other neighbouring buildings. The most significant views of the library are therefore gained at close proximity from Euston Road and the library piazza.

Internally, the library has several key public spaces that are designed using high quality materials and incorporate many interesting sculptural forms. For example, the generous main entrance lobby space, which provides the key circulation space within the library and is characterised by the use of travertine, white stone, bronze and American White Oak. The back-of-house office and storage spaces are generally more utilitarian in design and are specifically excluded from the listing.

On the north side of the library is an area of land that was originally cleared in order to accommodate later phases of the original library building project that were never implemented. In response to the curtailing of the project, the north elevation was redesigned to allow the library to appear as a standalone building with the potential to be extended in the future. Additional design features were added, such as a cylindrical 'pepper-pot' emergency escape staircase (adjacent to Ossulton Street) and



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the metal trellis screen which addresses the edge of the cafe terrace and limits views into the service yard and cleared site beyond. These features were clearly designed by Wilson's team and reflect the architecture and materials of the library. To the north of the library, the Conservation Studios were added in 2006 to designs by Long and Kentish Architects. Whilst the studios have clear associations with the use of the library and were designed by part of the original design team, they are specifically excluded from the listing and were granted a Certificate of Immunity from listing in 2021.

The library is also considered to be of high heritage and communal significance in association with its historic function of accommodating the national literary collection.

### Impact

The proposals have been designed by Rogers Stirk Harbour + Partners Architects and include the provision of a new contemporary extension to the north of the library that would contain new commercial space, library accommodation, and Crossrail 2 infrastructure. The extension would be arranged over 13 floors and would link to the existing library building at ground and first floor levels, including the remodelling of the existing cafe terrace. The proposals would also involve alterations to the library itself in order to create new links through to the extension and removal of fabric on the footprint of the extension, namely the metal trellis screen, the cylindrical escape staircase and the Conservation Studios.

The proposals would have varying degrees of impact on the significance of the library.

The proposed corridor links through the original library building have been carefully designed to reflect the character and materials palate of the surrounding listed spaces and should produce a seamless flow between the highly significant main entrance lobby space, through the non-listed spaces through to the new building. This would not result in harm to significance.

However, there would be some harm arising from the removal of the trellis screen and the cylindrical staircase on the north side of the library, as these features clearly add to the significance of the building. The proposed remodelling of the cafe terrace and the presence of the new extension in close proximity to the library would also have an impact upon the character of the terrace and on the immediate setting of the north elevation of the library and any rooms looking out from that elevation.

It should be noted that as the existing Conservation Studios are not listed or located in a conservation area and we do not wish to comment on the proposed demolition of this building.

We consider that the proposed extension has a relatively low impact on local



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townscape views that form part of the setting of the British Library. In the most significant views originating from Euston Road and the library piazza, the extension appears above the lower section of the library as a simple horizontal plane that is unlikely to compete with, or distract from, the existing form or outline of the library. In oblique views from Euston Road looking along Ossulton Street and Midland Road, the stair towers are partially visible and appear as subservient elements. Where the new extension would be more visible in closer views from Ossulton Road and Midland Road, it has been designed to follow the general geometry and colour palate of the library and, as such, would sit comfortably alongside the library.

In wider townscape views, the proposed extension is unlikely to impact on the most significant views of St. Pancras or King's Cross Stations. The most iconic and best recognised views of the stations originate from Euston Road, King's Cross Southern Square, and from the west end of Pentonville Road. In these views, the stations are seen to dominate the surrounding townscape that makes up the core of the King's Cross Conservation Area. The distinctive rooftop silhouettes of the stations are also unimpacted by backdrop development. In some less significant views of the stations originating from Gray's Inn Road and further east on Pentonville Road, it is evident that the upper levels of the proposed extension would be seen in the backdrop setting to the rooftops of St. Pancras Station and King's Cross Station, thereby potentially making it more difficult to discern the silhouettes of those buildings. We therefore consider the proposals would cause some harm to the setting of the stations in these views.

## Policy

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes a statutory duty for Local Planning Authorities to pay special regard to the desirability of preserving the special architectural and historic interest of listed buildings and their settings (Sections 16 and 66). Section 72 also requires LPAs to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.

Guidance on the exercise of this duty is given in the National Planning Policy Framework 2021, which recognises the conservation of the historic environment as part of the overarching environmental objective necessary for the achievement of sustainable development. At the heart of the framework is a presumption in favour of sustainable development (Para 10).

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. Where any proposed development proposal will lead to less than substantial harm to the significance of a designated heritage asset, paragraph 202 states that the harm should be weighed against the public benefits of the proposal



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including, where appropriate, securing its optimum viable use.

### Position

Historic England considers that the proposals would cause some harm to the significance of various heritage assets, as set out in the impact section above. For the purposes of the NPPF, we consider that the harm should be treated as less than substantial, and at the low end of the spectrum of such harm. We are satisfied that through detailed discussion on the emerging proposals at the pre-application stage this harm has wherever possible been avoided. We therefore recommend that the Council weighs the remaining harm in the balance against any public benefits arising from the scheme, in accordance with policy 202 of the National Planning Policy Framework.

We also recommend that conditions are applied on any grant of listed building consent, in recognition of the high heritage significance of the Grade I listed library. These conditions are set out in the accompanying letter of direction. They require recording of elements that are to be altered or removed, details of new works to the fabric of the library relating the provision of the link corridor, and alterations to the main entrance lobby and rear elevation.

### **Recommendation**

Historic England supports the applications on heritage grounds.

We consider that the applications meet the requirements of the NPPF, in particular paragraph numbers 199 and 202

In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your Authority should take these representations into account in determining the applications. If you are minded to grant listed building consent, we direct you to attach the conditions set out in the enclosed letter of direction. We have referred this letter to the National Planning Casework Unit (NPCU). You will be able to issue a formal decision once NPCU have returned the letter of direction to you, unless the Secretary of State directs the application to be referred to them.



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Historic England

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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