

Land to the North of the British Library

20 June 2022

Local Planning Authority: Camden

Local Planning Authority reference: 2022/1041/P and 2022/1320/L

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

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.

Listed Building Consent for both internal and external works

The applicant

The applicant is **SMBL Developments Limited' (SMBL) in partnership with The British Library Board** and the architect is **Rogers Stirk Harbour + Partners**.

Strategic issues summary

Land use principles: The site is within the CAZ. It is also allocated within Camden's Site Allocation Plan 2013 as Site Allocation 5 Midland Road Site and in draft Site Allocation Plan (2019) 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. The principle of use as library, galleries, learning, business and events spaces (Class F1) and retail and commercial spaces (Class E) is supported. Paragraphs 15 – 19.

Affordable workspace: Further details on the quantum and type of affordable workspace is required. Paragraph 20

Delivering of Affordable Housing: Viability discussions are ongoing determine the maximum viable level of affordable housing contribution. Paragraph 21 – 24.

Urban Design: The approach to scale, massing, layout and architecture are generally supported. Further details are required in relation to fire statement and public realm. Paragraphs 25 – 47.

Heritage: No harm has been identified in relation to Strategic Views or designated heritage assets in the wider area. Less than substantial harm has been identified to the British Library (Grade I) and British Library Centre for Conservation (Non-designated Asset). GLA officers will consider the agreed public benefits package in order to reach an overall conclusion at Stage 2. Paragraphs 48 – 57.

Transport: Works should be in line with Development Agreement for Crossrail 2 safeguarding, proposed disabled drop off on Midland Road not supported, S278 agreement required, further information on ATZ, safety and trip generation. Paragraphs 58 – 82.

Sustainable infrastructure: Further information is required in relation to energy, whole life carbon and circular economy. Paragraphs 83 – 87.

Environmental Issues: The approach to trees and water efficiency is supported. Further information is required in relation to urban greening, biodiversity, flood risk, drainage and air quality. Paragraphs 88 -103.

Recommendation

That Camden Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 107. Possible remedies set out in this report could address these deficiencies.

Context

1. On 10 May 2022 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
 - 1Bb Non residential developments in Central London excluding City of London and floorspace more than 20000 square metres
 - 1Cc The building is more than 30 metres high and is outside the City of London
3. Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

6. The site is within the Somers Town neighbourhood immediately north of the existing library bounded by the library to the south, Ossulston Street to the west, Dangoor Walk to the north, and Midland Road to the west. The site is within the London Borough of Camden's Knowledge Quarter, a regeneration area, and the Central Activities Zone. Part of the site is also safeguarded for Crossrail infrastructure. The site is allocated as the Midland Road Site – Land to the read of the British Library in Camden's Site Allocations DPD.
7. While the site itself is not within a conservation area, there is a rich heritage context around the site. The existing British Library is Grade I listed as is St Pancras Station and former Midland Grand Hotel and King's Cross Station to the west. Several Grade II buildings also surround the Site, including Great Northern Hotel, Camden Town Hall, Levita House and Chamberlain House. The site is also immediately west of the King's Cross St Pancras Conservation Area and in close proximity to the Bloomsbury Conservation Area.

8. The site has a Public Transport Accessibility Level of 6b on a scale of 0-6b where 6b is the highest. The site is adjacent St Pancras International Station, within 400 metres of King's Cross Station (Rail, Circle, Hammersmith & City, Metropolitan, Northern, Victoria, and Piccadilly Lines), and 500 metres of Euston Station (Rail, Overground, Northern and Victoria Lines). The nearest part of the Transport for London Road Network (TLRN) is the A501 Euston Road (Inner Ring Road) and with the Strategic Road Network (SRN) at Eversholt Street 300 metres to the west. The nearest cycle hire docking station is located at Belgrove Street, providing access to 48 docking points. Midland Road also includes a two-way segregated cycle route, part of Cycleway 6 (C6). The wider area is well served by the bus network with the immediate section of Midland Road providing southbound access only to routes 46, 63 and 214 with parallel northbound services on Pancras Road.

Details of this proposal

9. This application seeks full planning permission and listed building consent for the following:

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 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.”

Case history

10. The following planning permissions are relevant to the site.
11. There have been 5 pre-application GLA officers, 47 pre application meetings with the Council, including 6 meetings jointly between the Council and Historic England, between June 2020 and December 2021. In addition, the proposals were presented to the Camden’s Design Review Panel in October 2020 and May 2021.

Strategic planning issues and relevant policies and guidance

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Camden Local Plan (2017), Site Allocations Plan (2013) and, the London Plan 2021.
13. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - National Design Codes
 - Draft Site Allocations Plan (2019)
 - Draft Somers Town Neighbourhood Plan 2016
14. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

Good Growth	London Plan
World City Role	London Plan
Central Activity Zone	London Plan
Regeneration Area	London Plan, the Mayor’s Economic Development Strategy
Economic Development	London Plan, the Mayor’s Economic Development Strategy
Retail, Office	London Plan

Affordable Housing	London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy
Urban design	London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG; Optimising Site Capacity: A Design-led Approach draft LPG;
Heritage	London Plan;
Strategic Views	London Plan, London Plan Management Framework SPG
Inclusive access	London Plan; Accessible London: achieving an inclusive environment SPG;
Sustainable development	London Plan; Circular Economy Statements LPG; Whole Life-cycle Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Urban Greening Factor draft LPG; London Environment Strategy;
Air quality	London Plan; Air Quality Neutral draft LPG; Air Quality Positive draft LPG; London Environment Strategy; Control of dust and emissions during construction and demolition SPG;
Transport and parking	London Plan; London Environment Strategy; Mayor's Transport Strategy; Sustainable Transport and Walking draft LPG;
Crossrail	London Plan; Mayoral Community Infrastructure Levy; Crossrail Funding SPG; Use of planning obligations in the funding of Crossrail and the Mayoral

Community infrastructure levy
SPG;

Biodiversity

London Plan; London
Environment Strategy; Urban
Greening Factor draft LPG.

Land use principles

15. The site is within the Central Activities Zone (CAZ). 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. SD4 Part E and G specifically referencing the importance of promoting and enhancing the unique concentration and diversity of cultural, arts, entertainment, nighttime economy and tourism functions with the CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities. Policy SD5 Part C states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development in all other areas of the CAZ except some specific area, of which this site is not part of.
16. The site is also allocated within Camden's Site Allocation Plan 2013 as Site Allocation 5 Midland Road Site - Land to rear of The British Library which is identified 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.
17. It is also identified in Camden's draft site allocation plan 2019 as Policy IDS19 which is allocated for Land to the rear of the British Library 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.
18. The following land uses are proposed.

Land Use	Existing sqm	Proposed sqm	Uplift
Library (F1 Class)	8,105	15,015	+6,910
Commercial, formerly B1a/B1b (E Class)	0	77,046	+77,046

Commercial Retail (E Class)	0	558	+558
CR2 infrastructure (Sui Generis)	0	7,739	+7,739
Total	8,105	100,358	+92,253

19. The principle of cultural, learning, retail, commercial and community uses are set out in the site allocations and are therefore supported in line with London Plan Policies HC5 (Cultural and creative industries), S3 (Education and childcare facilities), E1 (Offices), E2 (Providing suitable business space), SD6 (Town centres and high street), E9 (Retail, markets and hot food takeaway) and E8 (Sector growth opportunities and clusters). The safeguarding of land and delivery of Crossrail 2 infrastructure is also supported in line with London Plan Policy T3 (Transport capacity, connectivity and safeguarding).

Affordable Workspace

20. Affordable workspace would be provided within the Business and Intellectual Property Centre. Further clarification is needed in relation to the quantum floorspace, rental levels and type of offer. It is noted that discussions are ongoing with the Council as to how affordable workspace will be delivered and operated.

Delivering Affordable Housing

21. London Plan Policy H4 states that affordable housing should be provided on site; and that affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.
22. Camden Local Plan Policy H2 promotes the provision of residential development in mixed use schemes where non-residential land uses are proposed. In the Central London Area, where development involves additional floorspace (GIA of 200 sq m+), the Council seeks 50% of all additional floorspace to be self-contained housing. Where the Council is satisfied that providing on-site housing is not practical, the Council will in exceptional circumstances seek a payment in lieu.
23. The applicant has submitted a financial viability assessment which is being robustly interrogated by GLA officers in conjunction with colleagues at Camden Council to ensure the scheme delivers the maximum amount of affordable

housing contribution. Discussions are currently on-going and an update will be provided at the Mayor's decision making stage.

24. The scheme will also be subject to both early and late stage viability reviews. GLA officers request early engagement on the wording of the S106 agreement to ensure that the review mechanisms and other London Plan policy requirements are appropriately secured prior to Stage 2.

Urban design

25. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
26. In line with London Plan Policy D4 this scheme has been subject to a process of independent design review by Camden's Design Review Panel in October 2020 and May 2021. The design review panel (DRP) expressed broad support for the overall design approach but sought refinements in various areas, making key recommendations with respect to public realm, landscape design, public access, social value and security arrangements. The scheme has also undergone a pre application assessment by GLA officers. The scheme has since been revised by the applicant team following this process.
27. Overall, the proposals are supported in strategic design terms, with the challenges of this complex and demanding brief resolved to a high standard.

Layout/context

28. The proposal is located outside of a conservation area, and its relationship with the curtilage of the Grade I listed British Library building is well handled and supported overall. The intention to develop this site in the original British Library masterplan suggests height/massing can be added here without fundamentally compromising the statutorily listed British Library.
29. The site layout has evolved from an analysis of the opportunities and constraints of the surrounding street network, as well as local heritage assets. The new buildings within the proposal are successful in maintaining local views and sightlines, including at the northern and western boundaries of the site.
30. The creation of a continuous north/south route through the site is supported and is a genuine public benefit of the proposal in an area with a deficit in public realm and local connections (legacy of the railways). This new route begins at the entrance of the existing British Library entry forecourt, winds through the existing building and proposal, and terminates in a new public space in the north of the site. Onward connections to the east and west beyond the site are also possible.

Scale and massing

31. The scheme proposes 12 storeys plus basement. The supporting text to Camden's Local Plan (2017) Policy D1 states 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. The proposed building is not considered substantially taller than the surrounding buildings.
32. The proposed height will be slightly taller than the listed British Library. Whilst the proposal appears to sit comfortably behind the listed British Library in the local views provided, the proposal has been designed to a standard where it can become a prominent part of the cluster of British Library/St Pancras. The ground floor/public realm experience is of greater importance on this constrained site. It is good that the roofline and its contribution to the skyline in longer views have been considered.
33. GLA officers agree with the conclusions of the Townscape, Heritage and Visual Impact Assessment (THVIA) that in the majority of 18 views assessed, the impact of the proposed development is negligible /or is beneficial.
34. The mass of the proposal has overall been successfully mitigated by the simple but considered and high-quality façade design. The inset ground and first floors create a visually and physically permeable base for the two elements of the proposed building, with upper floors grouped in pairs to create a middle. This grouping of floors is successful in referencing the distinctive horizontality of the listed British Library and reduces the visual impact of the differences in floor-to-floor height between the proposal and the listed British Library.
35. The upper storeys of the elements/buildings are also inset and use a lighter material palette to create a distinctive but subtle top to the proposal. These upper floors contrast successfully with the more solid red floorplates and black fins of the middle section, which evoke the listed British Library.
36. Circulation cores on the east and west gable ends of each building add verticality and appear to refer to aspects of the listed British Library. The southern 'block' closest to the library is large, and the inclusion of the circulation core to divide the western façade into two is important. This is probably on the margins of acceptability, and the support of Historic England/Council is key on this block in particular.

Architecture

37. The proposed architectural approach, which appears as an evolution of the listed British Library, is supported. The proposal appears capable of working well as an extension to the library as an addition to the local network of streets and spaces, and as a new feature in the local townscape.
38. The consistency in materials/colours with the listed British Library is supported. There appears to be sufficient distinction between new and existing buildings.

39. The decision to position active uses at ground floor is supported, and the local street network would benefit from more of this. Whilst this does create large areas of glazing that contrast with the listed British Library, this is mitigated by the mullions and columns that successfully bring the more solid upper storeys to ground level. This appears to be an evolution of the scheme since pre-application stage and is supported/commended.
40. Architectural details – including soffits, security screens, external beams, columns, and staircases – are well considered and appear as integral parts of the overall building architecture. This is a clear reference to the listed British Library, whilst also appearing as a contemporary building.

Landscape

41. The new external routes and spaces in and around the site are well positioned and proportioned, and do not appear to create pinch points. The new routes and spaces are important and a significant potential public benefit of the proposal. The site currently represents something of a barrier, and new/improved east/west routes could have a transformative impact on local connectivity, as well as creating new public realm and urban greening/planting/SuDS.
42. The public ‘cultural foyer’ at street level is in the right location and appears to be of the right proportions. Any negative impacts from the commercial tenancies on the ground plane have been reduced to the greatest extent possible. It is important that this space, and others across the site, conform to Public London Charter principles.
43. The considered approach to lighting design, which appears to integrate with the overall architectural/landscape design, is supported. It is good that the proposed lighting does not focus on ‘max lighting’ to exclusion of all else.
44. The new upper floor terrace and the new BL Learning Spaces is supported and is a successful series of spaces to enter the proposal from the existing British Library. The organic, circular forms are a good contrast with the angular forms of the proposal and the listed British Library. Similarly, the new northern elevation of the proposal onto the existing BL Courtyard is supported, and represents a good solution to the ‘join’ between the existing and new buildings.
45. Whilst programming public realm is helpful in landscape design, there should be some flexibility and informal space.
46. Some of the new external public routes at the top of the site look relatively narrow. It is not clear how the anticipated pedestrian movement will work, but it is likely to be significant. Officers query whether there is there enough space. CGIs of Dangoor Walk do not show much of an increase in area, whilst accommodating significantly more footfall. The footprint of the proposed extension may be too large; for example, the colonnade is not very large.

Fire safety

47. The application is supported by a Fire Statement which mostly addresses requirements of London Plan Policy D12. However, the statement should include the named authors of the report and their qualifications to ensure that it is drafted by suitably qualified third parties.

Heritage

48. The Planning (Listed Buildings and Conservation Areas) Act 1990 states that all planning decisions should “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”. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duty.
49. In addition, the NPPF states that when considering the impact of a development proposal 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In line with case law, any harm identified must be given considerable importance and weight.
50. The NPPF also states the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. 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.
51. London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance and should avoid harm. Policy HC1 also applies to non-designated heritage assets.
52. The following heritage assets have the potential to be impacted by the proposed development.

Conservation Areas

- Bloomsbury Conservation Area
- Kings Cross Conservation Area

Listed Buildings

- British Library (Grade I)
- St Pancras Station and the former Midland Grand Hotel (Grade I)
- Kings Cross Station (Grade I)
- Great Northern Hotel and attached railings (Grade II)
- Camden Town Hall (Grade II)
- Chamberlain House (Grade II)
- Walker House Southern Block Including the Cock Tavern Public House (Grade II)
- Levita House including attached shops and Somers Town Coffee House (Grade II)
- Stanley Buildings, Flats 21-30 (Grade II)
- No.26 Pancras Road (the German Gymnasium) (Grade II)
- Pancras Road Arches (Grade II)

Non-designated Asset

- British Library Centre for Conservation
53. In regard to heritage assets in the wider area, officers agree with the TVBHA that there 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 the heritage significance of those assets. The proposed development therefore complies with London Plan Policy HC1 in relation to these assets.
54. The HIA identified less than substantial harm with regards to BLCC, due to it being demolished, however concluded that there are significant public benefits arising from these works which could be considered to outweigh the harm. As there are ongoing viability discussions, GLA officers will consider the agreed public benefits package in order to reach an overall conclusion as to the public benefit offer at Stage 2.
55. Listed Building Consent
56. Listed Building Consent is required in relation to the works to the British Library itself. As above, the HIA identified less than substantial harm and concluded that there are significant public benefits arising from these works which could be considered to outweigh the harm. Again, as there are ongoing viability

discussions, GLA officers will consider the agreed public benefits package in order to reach an overall conclusion as to the public benefit offer at Stage 2.

Strategic Views

57. The site is located within four strategic views - View 2A.1 Parliament Hill to St Paul's, View 3A.1 Kenwood to St Paul's, View 4A.1 View 6A.1 Blackheath to St Paul's. Officers agree with the conclusions of the TVHIA and the Heritage Impact Assessment that the impact would be negligible or neutral and the proposed development would have no impact on the viewer's ability to recognise and appreciate St Paul's Cathedral.

Transport

Crossrail 2 (CR2)

58. The site is within the 2015 limits of safeguarding for Crossrail 2 and accordingly the proposals indicate the construction of a Crossrail shaft and infrastructure. TfL/Crossrail 2 has a stand-alone Development Agreement (DA) with the applicant to provide the civil infrastructure within their development to accommodate a Crossrail 2 station shaft for the Crossrail 2 station at Euston St Pancras.
59. Whilst the DA is a stand-alone agreement, the proposals should be consistent with the DA scheme. Crossrail 2 has issued separate comments on this matter advising the applicant that safeguarding conditions be attached to any permission.

Healthy Streets, Vision Zero and ATZ assessment

60. The proposed development must reflect the Healthy Streets and Vision Zero approaches to comply with London Plan Policy T1 (Strategic approach to transport). Officers expect all streets and public realm within and around the site to be designed to support Healthy Streets and Vision Zero.
61. The application includes an Active Travel Zone (ATZ) assessment. To comply with London Plan Policies T2 (Healthy Streets) T3 (Transport capacity, connectivity and safeguarding) T4 (Assessing and mitigating transport impacts) and D8 (Public realm) the design of the public realm should reduce vehicle dominance and improve walking and cycling desire lines and safety for pedestrians and cyclists.
62. A Section 278 (S278) agreement will be required with TfL for improvements to A501 Euston Road and this must be secured within the S106 agreement. Further detailed negotiation to clarify an appropriate scope for all TLRN highway works that will support the proposed development is therefore requested prior to determination.

63. The ATZ assessment has identified measures within the local area which encourage active travel. The applicant should discuss further with Camden Council to see how these measures identified can be taken forward.
64. TfL is proposing to deliver a safety improvements scheme at the junction of A501 Euston Road and A5202 Pancras Road. The scheme includes crossing improvements on the walking route between the site and well-used entrances of King's Cross interchange which will give future users of the proposed development access to many key LU and National Rail services, as well as bus stops on Euston Road and York Way. Given the increased pedestrian demand from this development, this should be discussed further with TfL.
65. TfL are also proposing to deliver a cycling safety improvement scheme at the junction of Ossulston Road and Euston Road. Due to the increased demand in cycling because of the development, TfL recommend further discussion of this too.
66. One or both of these strategic highway improvement schemes should be part-funded by the S106 agreement for the proposed development or safeguarded and enabled via S278 works. Further discussion between the Council, TfL and the applicant must take place on this matter prior to determination.

Trip generation

Bus Impacts

67. The predicted trips from the proposed development may have an impact on the surrounding bus network. The applicant should provide bus trip figures assigned appropriately by route based on the existing network to determine whether any mitigation will be necessary. It is also expected that the proposed bus trip figures be higher for routes closer to the site, and that the number of bus route frequencies are incorrect and should be corrected.

London Underground

68. The development is predicted to add trips to the network. This increase is a concern for the Northern Line from Euston, or Metropolitan Line from King's Cross St Pancras, which were running at high loading in 2019.
69. To assess impact on the network, officers recommend the applicant undertake station capacity and line loading assessment for the development.

Cycling

70. 1,112 long stay cycle parking spaces are proposed for staff. This is above London Plan Policy T5 (Cycle Parking) minimum and is strongly supported due to the predicted increase in mode share of cycling and the investment in the local network.
71. 172 short-stay cycle parking spaces are also proposed. 122 spaces within the site and 50 within the local area which has been agreed with a financial contribution between the Council and the applicant.

72. All cycle parking, in line with London Cycle Design Standards (LCDS), should be located in an easily accessible and safe spaces, equipped with end of user facilities. 5% of the Sheffield stand type spaces should be at ground level with sufficient access space to accommodate adapted bikes for inclusive cycles, cargo cycles, and tricycles.

Cycle Hire

73. 5 additional docking points at Ossulston cycle hire docking station are required to mitigate the increase in demand from the proposals. This should be secured by S106 agreement; officers welcomes further discussion about this matter.

Car parking

74. A total of 3 disabled car parking spaces are proposed for staff and guests.
75. Car free developments are promoted throughout the Central Activity Zone (CAZ) therefore no general car parking is acceptable. Only operational car parking which supports the Library operations is compliant with the London Plan however this must not lead to private vehicles dominating public space around the development. The applicant should clarify all 27 proposed car parking spaces usage.
76. All the proposed car parking will have active electric vehicle charging point (EVCP) provision in line with London Plan Policy T6 Part G (Car Parking). This should be secured via condition.
77. The proposed disabled drop off space on Midland Road is not supported and should be removed from the proposals. Step free accessible bus services are available nearby and new step free access to LU services at King's Cross station has recently been secured from the nearby Belgrove House development.
78. Furthermore, the location adjacent to Cycleway 6 is inappropriate and does not comply with London Plan Policy T4 (Assessing and mitigating transport impacts) or Vision Zero, as it is not contributing positively to reducing vehicle dominance.
79. A Parking Design and Management Plan should be secured by condition in accordance with London Plan Policy T6 Part J. Given the high number of operational and disabled car parking spaces initially proposed, it should be clarified how reductions will be achieved in future and how car parking removed in future can be converted to other uses such as cycle parking and new green infrastructure.

Construction

80. An outline Construction Logistics Plan (CLP) has been provided. A full CLP should be secured by condition in line with London Plan Policy T7 (Deliveries, servicing and construction) and discharged in consultation with TfL prior to commencement. The full CLP should detail all logistics and construction proposals to ensure that pedestrian and cyclist movement and safety and bus

operations are maintained throughout construction. This will support sustainable travel in line with London Plan policies and the Mayor's Vision Zero goal to eliminate deaths and serious injuries from London's transport networks by 2041 and ensure compliance with London Plan Policy T4 Part F, which states that development proposals should not increase road danger.

Deliveries and servicing

81. A Delivery and Servicing Plan (DSP) in line with London Plan Policy T7 has been provided. This includes a delivery and servicing strategy for this site which ensures that the proposed development does not impact on the surrounding transport network.
82. The provision of cargo bike parking bays to support last-mile deliveries by foot or cycle is welcomed in line with the Mayor's Freight and Servicing Action Plan.

Sustainable development

Energy strategy

83. An energy strategy has been provided which generally complies with London Plan Policy SI 2. Further information is required on the carbon emissions reporting, heat loads, communal heat network, PV and heat pumps.
84. Detailed comments have been provided to the applicant and Council in full under a separate cover. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.

Whole Life Carbon

85. The applicant has submitted a WLC report which appears to cover much of the assessment requirements, however an Excel version of the GLA WLC template must also be submitted to allow a full review to be completed against the guidance. It should also be noted that the guidance has been updated.

Circular Economy

86. An Circular Economy Statement has been provided. Further information is required in relation to key commitments, bill of materials, recycling and waste reporting, operational waste, plans for implementation, end of life strategy as well as some further supporting documentation.
87. The applicant has also produced a BLCC Demolition Justification Report which has considered the impact of the retaining versus demolition of the existing BLCC building which is only 14 years old. The main case for demolition appears to be daylighting concerns and declining quality of internal conditions given the surrounding development. The report concludes that this could not be addressed through refit/refurbishment as the issue arises from the massing.

Detailed comments have been provided to the applicant and Council in full under a separate cover. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.

Environmental issues

Urban Greening

88. The proposed development presents a well-considered approach to integrating urban greening. The diversity of green roofs proposed, including a 'wet meadow', is considered a very positive inclusion.
89. The UGF Report explains that areas of woodland have been incorporated into the design, achieving a score of 1. Whilst the inclusion of trees is positive, the proposed design does not appear to represent 'woodland' as defined in UGF guidance. The applicant should revise the UGF accordingly. The applicant should also provide a drawing showing the extent of each surface cover type.
90. Additionally, despite the inclusion of some high quality urban greening, the UGF was reported to be 0.25, and therefore below the 0.3 target. The applicant should therefore review the quality and quantity of urban greening, seeking to enhance the overall UGF. The UGF guidance should also be consulted in this review as it provides guidance for measurements – for example measuring proposed trees based on anticipated canopy cover at establishment – it is not clear if this approach has been taken in the absence of a supporting plan.
91. If the UGF target cannot be achieved, robust justification should be provided.

Biodiversity

92. The applicant has provided a Biodiversity Net Gain (BNG) Assessment Report based on Metric 2.0. Metric 3.0 was published in July 2021 and therefore is considered the appropriate metric to use for calculations. The applicant should therefore justify the use of Metric 2.0 or update the BNG calculation in line with the latest methodology (now Metric 3.1).
93. Aside from the comment above, the BNG calculation provided concluded a 33% net gain, demonstrating compliance with Policy G6, assuming the gain is not diminished under the latest metric. This should be clarified prior to Stage 2.

Trees and Woodlands

94. There are five existing trees on site, comprising four category C trees and one category B tree. All five trees would be removed as part of the proposed development. 175 trees are proposed as part of the scheme, resulting in a net increase of 170 trees. Whilst the removal of trees is regrettable, the substantial

gain in overall number of trees satisfies London Plan Policy G7, subject to agreement of tree removal with the Council.

Flood Risk

95. The Flood Risk Assessment provided for the proposed development does not currently comply with London Plan Policy SI12.
96. There is an identified risk of groundwater flooding at the site. Groundwater monitoring (ideally over the winter months) should be undertaken to confirm the risk to the site and inform the exact mitigation measures required. This should be secured by condition.
97. The FRA acknowledges the identified risk of surface water flooding both within and adjacent to the site. The FRA states that the current masterplan removes the raised feature adjacent to Midland Road, which are currently preventing surface water from overtopping onto the site. Further commitment (and details) of the preferred mitigation strategy should be provided at this stage. Passive measures (such as appropriate levels design) should be included over measures such as temporary flood barriers.

Sustainable drainage

98. The surface water drainage strategy for the proposed development does not currently comply with London Plan Policy SI 13. The discharge rate should be further reduced towards the Qbar greenfield rate, all SuDS should be included on the drainage plan, and an assessment of the exceedance flood flow routes should also be provided.

Water efficiency

99. The proposed development meets the requirements of London Plan Policy SI 5.

Air quality

100. An Air Quality Neutral assessment and An Air Quality Positive Statement were submitted in support of this application. The Air Quality Positive Statement complies with London Plan Policy SI 1. However the Air Quality Neutral assessment was carried prior to the Air Quality Neutral LPG was published in 2021. The applicant should therefore update the Air Quality Neutral assessment based on the updated guidance.
101. Further details are also required in relation to road traffic impacts.
102. Detailed comments have also provided to the applicant and Council in full under a separate cover. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee.
103. Given the location of the proposed development in proximity to a number of human health receptors, construction works mitigation relevant to a high risk site, along with requirements for NRMM to comply with Low Emission Zone

standards for the Central Activities Zone should be secured by condition, in line with London Plan Policy SI1 (D).

Local planning authority's position

104. Camden Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

105. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

106. There are no financial considerations at this stage.

Conclusion

107. London Plan policies on land use principles, affordable workspace, affordable housing, urban design, heritage, transport, sustainable infrastructure and environmental issues are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land use principles:** The site is within the CAZ. It is also allocated within Camden's Site Allocation Plan 2013 as Site Allocation 5 Midland Road Site and in draft Site Allocation Plan (2019) 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. The principle of use as library, galleries, learning, business and events spaces (Class F1) and retail and commercial spaces (Class E) is supported.
- **Affordable workspace:** Further details on the quantum and type of affordable workspace is required.

- **Delivering of Affordable Housing:** Viability discussions are ongoing determine the maximum viable level of affordable housing contribution.
- **Urban Design:** Further details are required in relation to fire statement and public realm.
- **Heritage:** Less than substantial harm has been identified to the British Library (Grade I) and British Library Centre for Conservation (Non-designated Asset). GLA officers will consider the agreed public benefits package in order to reach an overall conclusion at Stage 2.
- **Transport:** Works should be inline with Development Agreement for Crossrail 2 safeguarding, proposed disabled drop off on Midland Road not supported, S278 agreement required, further information on ATZ, safety and trip generation.
- **Sustainable infrastructure:** Further information is required in relation to energy, whole life carbon and circular economy.
- **Environmental Issues:** Further information is required in relation to urban greening, biodiversity, flood risk, drainage and air quality.

For further information, contact GLA Planning Unit (Development Management Team):

Rachael Rooney, (case officer)

email: rachael.rooney@london.gov.uk

Graham Clements, Team Leader – Development Management

email: graham.clements@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

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