

Date: 28 June 2021

Anna Gargan
Senior Planning Consultant
Gerald Eve LLP
72 Welbeck Street
London W1G 0AY

Via email: AGargan@geraldev.com

**Development Management
Planning Services**

London Borough of Camden
Town Hall
Argyle Street
London WC1H 8ND

Tel 020 7974 4444

Fax 020 7974 1975

planning@camden.gov.uk

www.camden.gov.uk/planning

Our ref: 2021/2164/P
Please ask for:
Jennifer Walsh
Telephone: 0207 974
3500

Dear Anna Gargan,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017:**

RE: British Library Extension – request for EIA Scoping Opinion

The applicant made a request for an EIA Scoping Opinion, prepared by Arup and received by the Council on 29th April 2021. Further to this request, please accept this letter as the Council's formal Scoping Opinion in accordance with Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), herein referred to as the 'EIA Regulations 2017'.

In adopting this Scoping Opinion, the Council has carried out consultation with relevant bodies (Regulation 15(4)) and had regard to:

- a) any information provided by the applicant about the proposed development;
- b) the specific characteristics of the particular development;
- c) the specific characteristics of development of the type concerned; and
- d) the environmental features likely to be significantly affected by the development (Regulation 15(6)).

The following consultees have been consulted in preparing this scoping opinion:

- LBC (London Borough of Camden) – Building Control;
- LBC – Conservation;
- LBC – Economic Development;
- LBC – Environmental Health (Contaminated Land);
- LBC – Green Space;
- LBC – Nature Conservation;
- LBC – Sustainability;
- LBC – Environmental Health (noise and air quality);
- LBC – Transport;
- LBC – Tree Management;
- LBC – Urban Design;

- LBC – Lead Local Flood Authority
- Environment Agency;
- Historic England
- Greater London Archaeological Advisory Service (GLAAS);
- Council for British Archaeology;
- Greater London Authority (GLA);
- HS2 Ltd;
- Network Rail;
- Francis Crick Institute;
- Transport for London;
- London Underground Infrastructure Protection;
- Crossrail 2;
- Natural England;
- Thames Water;
- Metropolitan Police Service;
- NHS North Central London Clinical Commissioning Group (CCG);
- Sport England.

The consultation responses on the EIA Scoping Report are enclosed within Appendix 1 of this letter.

The Council's comments on the proposed scope of the Environmental Impact Assessment (EIA) and resultant Environmental Statement (ES), as detailed within the Scoping Report, are provided in the sections below. For clarity, comments have been provided on each relevant section of the scoping report.

Introduction

Background

The information included in this section is considered acceptable.

Scoping context

The information included in this section is considered acceptable.

Overview of the proposed scope of the EIA

Reference should be made to the detailed comments made on each of the technical areas to either be scoped into or out of the EIA in the subsequent sections of this EIA Scoping Opinion.

As is referenced elsewhere in the EIA Scoping Report, the construction assessment in each technical assessment should additionally include for demolition.

The EIA Scoping Report, at the bottom of page 2, defines construction effects as “temporary effects that arise as a result of the construction process”. However, it should be noted that construction effects could be permanent. For example, demolition/excavation works could have a permanent effect on archaeology or heritage assets for example.

EIA Regulations and approach to EIA

The need for an EIA

The information included in this section is considered acceptable.

EIA scoping

The information included in this section is considered acceptable.

General approach to EIA

The EIA Scoping Report states *“The EIA will be undertaken in accordance with the EIA Regulations and relevant guidance, and by competent experts in all areas”*. The ES should detail the relevant qualifications, professional registrations and experience of the lead EIA practitioners and all contributing technical experts for the ES.

In addition to describing whether the environmental effects are direct, indirect, secondary and significant or not significant, the ES should specify the temporal nature of any effects predicted. This should include reference to whether the effects are predicted to be short, medium, long-term and whether they are permanent or temporary. A clear definition should be given, in the ES methodology chapter, for the terminology used throughout the ES to describe the temporal nature of the effects in terms of the timescales represented.

With regard to the COVID-19 pandemic, and potential survey work limitations, it is recommended that the collection of baseline data and the use of existing baseline data should be discussed and agreed with the relevant technical officers within LBC (and other statutory consultees, where relevant) where possible ahead of the ES being submitted.

In regard to baseline analysis, commentary should be provided in each of the technical assessments on how the baseline conditions could change from the current baseline in the future without the development going ahead) by the year of full completion. It is acknowledged that material changes could occur for some disciplines, but not necessary all. Commentary should be made on whether such changes could affect the receptor sensitivity that has been identified during the existing baseline review.

In each assessment, commentary should be provided on whether the technical consultant recommends the need for any monitoring of significant residual effects, if there is the potential for these to remain as significant post-mitigation.

Cumulative effects

As is proposed in the EIA Scoping Report, the cumulative impacts and effects of the proposed development with other relevant nearby proposed developments should be assessed in the ES.

It is noted that the criteria included Appendix A of the EIA Scoping Report proposes the assessment of development projects that have been submitted for planning but that have not yet been determined. LBC agree with this position, so that the cumulative effects assessment is as up to date as possible at the time of submission of the planning application / at planning committee.

Beyond the list of proposed cumulative development schemes included here, the list of proposed developments to be assessed should be re-reviewed (against the specified criteria) ahead of commencing the assessment work. Ideally, this list is further discussed with LBC at that time. This will ensure that the list of cumulative development schemes is as up to date as possible at the time of the assessment work commencing. There may also be a need to coordinate assessments between this site and other sites, if they are due to be submitted and considered at a similar time.

The schedule of cumulative developments included in Appendix A of the EIA Scoping Report includes variations to original consents. The EIA should ensure that any variations to the original consents, that may be material to the cumulative assessment, are considered: for example, consents approved via Section 73 of the Town and Country Planning Act 1990.

There are a number of reserved matters planning applications listed in the schedule of cumulative developments in Appendix A. For completeness, the ES should clearly set out all relevant planning applications for each scheme, including the original outline planning application. Outline planning applications should be assessed for the phases that have yet to be submitted for reserved matters.

The ES should include a location map of all sites being assessed in the cumulative assessment.

Whilst not part of the cumulative assessment, the technical assessments should have regard to impacts and effects to any future receptors in the vicinity of the site that may be affected. Specifically, this may include nearby planning applications / permissions that are lower than the thresholds defined in the EIA Scoping Report.

The ES should outline where any of the earlier phases of the identified cumulative schemes are constructed and occupied, and therefore considered to form baseline for the assessment. The assumed construction phasing of nearby cumulative developments should be outlined in the ES and where this is not clear from the associated planning documentation for those schemes, details should be provided on any assumptions made i.e. the potential for overlap of construction phasing if this represents a worst case for assessment purposes.

EIA consideration of climate change

The information included in this section is considered acceptable.

Structure and content of the Environmental Statement

The information included in this section is considered acceptable.

Accompanying documents

The list of specified planning documents in this section of the EIA Scoping Report appears to be missing a number of reports referred to elsewhere in the report. For example, the EIA Scoping Report additionally makes reference to the submission of a Circular Economy Statement and Delivery and Servicing Management Plan with the planning application. The other documents specified as being submitted with the planning application elsewhere in the EIA Scoping Report will also need to be submitted.

Non-Technical Summary

The information included in this section is considered acceptable.

Next steps

The information included in this section is considered acceptable.

The Site and surrounding area

The information included in this section is considered acceptable. Note LBC would require the plans submitted with the planning application to show the element of change to the existing building with a red line and the whole of the existing building with a blue line.

Environmental context

The information included in this section is considered acceptable.

The Proposed Development

The planning application

It is assumed that the quantum of development described in this section and red line plan provided on page 9 of the EIA scoping report, captures the maximum quantum and maximum red line extent that could be included with the planning application for the purposes of EIA scoping. Note LBC would require the plans submitted with the planning application to show the element of change to the existing building with a red line and the whole of the existing building with a blue line.

Environmental design and management measures

The information included in this section is considered acceptable.

Construction phase

The information included in this section is considered acceptable.

Topics in scope

Air quality

LBC Response

The London Plan and associated guidance requires an air quality positive assessment / statement to now be submitted for major developments in London subject to EIA. This should therefore be prepared and accompany the Air Quality ES Chapter.

There are no further comments on the scope of the Air Quality ES chapter, beyond those provided by the Francis Crick Institute and Network Rail (below) – which should be addressed in the ES. No comments have been received from the LBC Environmental Health officer.

- **Francis Crick Institute Response**

The development proposals include uses such as life sciences. Dependant on the type of life science activities that occupy the proposed building there maybe potential for relevant emissions from the building associated with these uses. Consideration should be given to whether the life science uses will include containment facilities, which is likely, and if so to what level and how will extraction requirements be incorporated into the building. Extraction, flue location and heights of flues to ensure relevant dispersion are an important consideration under Air Quality.

During the evolution of the Crick's proposals it was necessary to raise the height of the flues on our building to ensure adequate dispersion of materials (and possible odours) so as not to impact residential development to the north and this was a factor in the design of the upper floors of Brill Tower. The assessment of potential effects arising from this particular use must have regard to the existence of the Crick, to the north, and to climate conditions, so that the cumulative impacts of both developments are considered against sensitive receptors adjacent to the combined sites; specifically Brill Tower (currently under construction) that sits in the prevailing wind direction from the development site.

- **Network Rail response**

Environmental issues

The design and siting of buildings should take into account the possible effects of noise and vibration and the generation of airborne dust resulting from the operation of the railway.

Archaeology

LBC Response

The archaeology assessment proposes an assessment of “existence effects”, whilst scoping out “construction effects” and “operational effects”. It is considered that the scoping out of operational effects is reasonable. However, the construction process itself could lead to impacts and effects to archaeological assets. For example, excavation works and their associated impact and effect to below ground archaeology. This would be an impact and effect as a result of the construction process, as opposed to an effect that is limited to the “existence” of below ground basements and infrastructure. LBC will therefore require an assessment of construction effects relating to archaeology in the Archaeology ES Chapter. This approach would also be consistent with the built heritage topic, which scopes in an assessment of both construction and existence effects.

There are no further specific comments on the scope of the Archaeology ES chapter from LBC.

No comments have been received from GLAAS.

Built heritage on-site

LBC Response

There are no specific comments from LBC on the scope of the Built Heritage ES chapter.

Historic England have confirmed that they have no comment to make as per their response below.

No comments have been received from the LBC Conservation officer.

▪ **Historic England response**

On the basis of the information available to date, we do not wish to offer any comments. This response relates to designated heritage assets only.

Climate change

LBC Response

It is agreed that significant effects relating to climate change are likely to arise from the proposed development, therefore, this topic should be scoped into the ES.

The scope of the greenhouse gas (GHG) emissions assessment element of the climate change ES chapter is appropriate for assessing the likely effects associated with the proposed development. It is acknowledged that the IEMA EIA Guide to Assessment Greenhouse Gas Emissions and Evaluating their Significance recognises that all projects will contribute to climate change; the largest inter-related cumulative environmental effect/ Furthermore, that in the absence of any defined threshold, any carbon emissions are considered to be potentially significant. However, it is not clear what criteria shall be used to determine receptor sensitivity and magnitude of impact, and therefore level of effect significance. This should be made clear within the ES chapter.

All sources of GHG emissions benchmarks and conversion factors should be made clear within the ES and a summary of any calculations should be included with/appended to the ES.

It is agreed that ‘in combination climate impacts’ are best assessed within each ES chapter scoped into the EIA, as per the IEMA EIA Guide to Climate Change Resilience and Adaptation.

It is noted that the ES will also describe how the design of the proposed development has responded to a changing climate and embedded resilience. However, it is not clear on the methodology that shall be used for assessing this, or where it shall be placed within the ES. The IEMA EIA Guide to Climate Change Resilience and Adaptation provides some further guidance on this and states that “*project resilience to climate change impacts needs to be assessed as a part of the design (and is generally*

best reported in the analysis of alternatives). It is also better suited to a Risk Assessment type process than traditional EIA 'determination of significance'".

Daylight, sunlight, overshadowing and solar glare

LBC Response

The solar glare assessment methodology described in Section 5.5.3 is limited to a qualitative assessment based on the relative locations of sun position, building surfaces and sensitive viewpoints, without quantifying the magnitude of effect of any potential glare source identified. This is an acceptable approach provided any glare sources identified can be demonstrated to be obstructed by embedded mitigation measures. If proposed mitigation measures do not completely obstruct identified glare sources, a quantitative assessment of the intensity of glare against a recognised threshold above which visual impairment is likely should be carried out.

Specific locations and viewpoints subject to assessment should be agreed, where possible, with Network Rail and with the London Borough of Camden ahead of the assessment being undertaken.

The BRE Report, BR209: Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, 2011 also includes windows of nearby existing and future planned buildings as key locations for the assessment of solar glare. There is currently no discussion on this in the EIA scoping report and therefore it is assumed that effects associated with such receptors are unlikely to be significant. However, if this is the case it should be acknowledged in the methodology section of the daylight, sunlight, overshadowing and solar glare ES Chapter for completeness.

Electronic interference

LBC Response

There are no specific comments on the scope of the Electronic Interference ES chapter, beyond those provided by the Francis Crick Institute (below) – which should be addressed in the ES.

▪ Francis Crick Institute Response

The scoping makes reference to the potential impacts on the Airwave network, the emergency services communications system, but it should be noted that this is being replaced by the Emergency Services Network (ESN). Although delayed ESN is now scheduled to be operational in 2025/26, whilst the proposed construction will be taking place. Whilst ESN hopes to use the existing mast network, additional masts are having to be provided in urban areas and the assessment should factor in both Airwave and ESN or require a future addendum if data is not currently available, when ESN is commissioned.

With respect to terrestrial TV and radio, although it was not expected that the Crick would cause any disruption, some did occur to a number of residential uses to the north/north-east and we believe the Brill Tower proposals considered impacts to terrestrial TV and radio. We agree that it is unlikely that there would be any interference arising from the Library building but this should not be ruled out in its entirety.

There are no specific references to EMI impacts on the Crick during construction or in operation, nor are there any comments on the building and equipment sensitivity to impacts of this nature. Activities within the Crick have the potential to be susceptible to EMI. This should be factored into the scoping although in all likelihood mitigation may be a localised issue arising when an issue arises.

Environmental wind

LBC Response

The proposed methodology includes for a qualitative desk based assessment, progressing to a quantitative (wind tunnel) assessment should the assessment author deem effects may occur that cannot be robustly mitigated. As per our previous discussion, LBC will require a quantitative assessment of wind microclimate conditions (for the baseline, with the proposed development and alongside any cumulative schemes in the radius of the wind model). This could be in the form of a wind tunnel or computational fluid dynamics study. This is because of the height of the proposed development (it is over ten storeys) and to adequately demonstrate, quantitatively, that all effects have been assessed and mitigated, especially those within the proposed public foyer.

Note the EIA Scoping Report states that the wind assessment will consider “existence” effects. The EIA Scoping Report further states that:

“Operational effects are scoped out of the assessment as operational activities would not give rise to additional effects to those occurring in the existence phase”.

Existence effects are defined in the EIA scoping report as follows:

Existence effects - effects that arise due to the physical existence or presence of a Proposed Development; for example, the effects of land take on archaeology, and the visual effects from the presence of new structures. Although these effects initially arise during construction, they do not generally vary overtime. Existence effects therefore arise from works that enable the Proposed Development to exist.

Operational effects are defined as follows:

Operational effects - effects arise from how a development will be used; for example, effects from road traffic travelling to and from the Site.

Given that the proposed development will amend outdoor circulation and seating areas, the operation of the proposed development itself should also be considered in the ES. The wind assessment should ensure that the proposed uses on the site are suitable for their intended use from a wind microclimate perspective. It might be appropriate to consider off-site effects as existence effects, and effects to site users as operational effects for example. Regardless of how the chapter is structured, effects to on-site users should be considered and assessed.

Comments from the Francis Crick Institute are provided below. The wind assessment, and any required mitigation, should address any significant adverse effects on and off-site, as a result of the proposed development.

▪ **Francis Crick Institute Response**

The Crick would have concern should the pedestrianised Dangoor Walk become a wind tunnel as a result of the proposed development, and initial modelling should be undertaken. The Crick would be extremely concerned if the proposed mitigation impacted the use of Dangoor Walk particularly in respect to the comment made that ‘regulating the use of the space’ may be one solution.

Dangoor Walk is already established and the impact of wind would affect Dangoor Walk as well. How would the suggested mitigation measures be applied to land outside the application site and how does this rationalise the Council’s requirement to ensure a permeability route across the site?

Noise and vibration

LBC Response

There are no specific comments on the scope of the Noise and Vibration ES chapter, beyond those provided by the Francis Crick Institute and Network Rail (below) – which should be addressed in the ES. No comments have been received from the LBC Environmental Health officer.

▪ **Francis Crick Institute Response**

As with the Brill Tower proposals, this is the greatest area of concern for the Crick and has the potential to directly impact the future operations of the Institute. Reference to the sensitivity of the Francis Crick Institute is referred to in Section 5.8.2. The Crick's most sensitive activities are located to the south side of its building and these will need to be carefully considered (like they have been for Brill Place Tower (BPT) proposals).

As outlined in the Scoping Report, there could be 'temporary significant adverse vibration effects' on the Crick arising from construction and we would like to draw attention to issues that have arisen in respect Brill Place Tower. Arrangements were introduced with the developers of BPT to minimise and manage these issues. We would expect that the British Library would look to a mitigation solution that involves close cooperation with the Crick, as has been undertaken with BPT, throughout the construction and that this is incorporated into the Environmental Statement.

The key to setting the relevant mitigation strategy will be the baseline noise and vibration studies and we suggest that the baseline studies include monitoring points in the Crick where these will likely be maintained through the construction phase for monitoring purposes. In any planning application submission, the Crick will seek to work closely and collaboratively with the developers (as it did with BPT) to set noise/vibration thresholds and how exceedances will be managed and responded too, if and when they occur.

With respect to noise, if the proposed development is to have standby generators associated with the ongoing uses, which is likely given that the Alan Turing Institute is to be located within the development, and life sciences are a specific land use, then consideration must be given to the impact that these might have in the event of a significant electrical outage requiring black start and this needs to also consider the cumulative impact of standby generators at both the British Library and the Crick may have in noise terms. As such the base study needs to extend beyond the site to factor in the wider physical environment.

It would be worth noting that this area has previously (2019) had a full outage over a number of days as a result of the failure of the local UKPN sub-station; which exists as a single point of failure. During this period the Crick's emergency generators operated as they were expected to do, but this was continuously until power was restored.

▪ **Network Rail response**

Piling

The developer must ensure that any piling work near or adjacent to the railway does not cause an operational hazard to Network Rail's infrastructure. Impact/Driven piling scheme for a development near or adjacent to Network Rail's operational infrastructure needs to be avoided, due to the risk of a major track fault occurring. No vibrocompaction/ displacement piling plant shall be used in development. Where piling equipment / plant is to be used in the development, foundation design and details of the use of such machinery and a method statement should be submitted for the approval of Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

Environmental issues

The design and siting of buildings should take into account the possible effects of noise and vibration and the generation of airborne dust resulting from the operation of the railway.

Townscape, visual and built heritage off-site assessment

LBC Response

There are no specific comments on the scope of the Townscape, Visual and Built Heritage Off-site Assessment, beyond those provided by the Francis Crick Institute (below) – which should be addressed in the ES. LBC Conservation and Urban Design Officers have requested a number of other recommendations to date within the pre application process in regard to relevant policy, guidance and scheme design considerations. It is recommended that the Applicant continues to engage in the pre application process.

▪ **Francis Crick Institute Response**

We understand that the proposals may extend landscaping features on to land owned by the Crick. Whilst the Crick will review these when formally consulted on by the developers, and are not necessarily adverse to this, consideration will need to be given to how these impact on the Crick's S.106 obligations. As the Council is aware, the Crick is in the process of planning for the re-commence of its local community engagement activities, having been suspended due to Covid, and areas such as the forecourt has always been identified as a primary location for exhibition/community related activity.

As such, whilst we have no specific comment at this time on the scoping of the townscape component of the EIA, we will be particularly interested in the townscape at the eastern end of the site (Midland Road) and views north/south.

Subject to the comments above, the scope of this assessment, as described in this section of the Scoping Report, is considered acceptable.

Topics to be scoped out

Contaminated land

LBC Response

It is agreed, that subject to the measures outlined and committed to in the Scoping Report being developed and agreed with LBC's Environmental Health / Contaminated Land officer, that significant effects relating to ground contamination are unlikely to arise and that therefore that this topic can be scoped out of the ES.

The LBC Environmental Health Officer response is included below. They have raised no objection to the scoping out of this technical area. As is indicated by the EIA Scoping Report, the LBC Environmental Health Officer / Contaminated Land officer should review and sign off any required remediation strategy and verification report, which can be secured via appropriately worded planning conditions.

The Francis Crick Institute have provided comments related to Unexploded Ordnance, and this should be addressed outside of the EIA process within the Phase 1 Ground Desk Study and as required in the future ground investigation.

▪ **LBC Environmental Health officer response**

Within the EIA Scoping Report provided as part of the above planning application, it has been specified that contaminated land has been scoped out of the EIA Scoping Report as a

separate Geotechnical Desk Study and Contamination Risk Assessment has been prepared and will be submitted with the planning application in accordance with Environment Agency (Land Contamination: Risk Management) and Camden Council guidance. The applicant is not asking for contaminated land to be considered as part of this EIA Scoping Application.

▪ **Francis Crick Institute Response**

.. although not a matter for the EIA, we would like to flag that from our own application we are aware that this area specifically, and it's surroundings, was bombed on several occasions during WW2 and would request that any application is supported by the provision of a UXO study given that history. We believe that the developers may already have indicated that they are intending to prepare a suitable report already.

Ecology

LBC Response

It is agreed, that subject to the measures outlined in the Scoping Report being put in place, that significant effects relating to ecology and biodiversity are unlikely to arise and that therefore this topic can be scoped out of the ES.

Beyond the EIA process, the LBC Nature and Conservation officer has welcomed a commitment to explore opportunities to incorporate biodiversity enhancements across the site.

▪ **LBC Nature Conservation officer response**

I have no comment to make on the scoping report, beyond welcoming the commitment to explore opportunities to incorporate biodiversity enhancements.

Human health

LBC Response

It is agreed that a dedicated human health ES chapter can be scoped out of the ES, with this topic being dealt with in a standalone health impact assessment (which will need to confirm, when accompanying the planning application, that effects are indeed not likely to be significant) and where relevant in other ES chapters. Therefore, this topic can be scoped out of the ES.

Major accidents and disasters

LBC Response

It is agreed that significant effects relating to major accidents and disasters are unlikely to arise and that therefore this topic can be scoped out of the ES.

Socio-economics

LBC Response

The EIA Scoping Report suggest that significant environmental effects are not predicted. However, given the nature of the proposed development, including the offer of new social infrastructure/public institutional space with the proposed development itself, and the number of new jobs created – further analysis should be undertaken and presented to confirm that significant effects are not predicted.

The EIA Scoping Report alludes to some uncertainty on the end user as follows “the future tenants and therefore the specific sectors occupying the new floorspace cannot be guaranteed at this stage or through the buildings lifespan and therefore the effects are not likely to be significant, based on information currently known”. This is somewhat inconclusive and should be analysed further, and if required, scenario testing should be undertaken which accounts for the potential range in effects depending on the end user.

LBC would therefore require a dedicated Socio-economics ES Chapter to be included in the ES.

The response from LBC Economic team is included below.

▪ **LBC Economic Department response**

- *The Council will use our planning policies to secure our standard employment obligations, including construction apprenticeships, construction work experience opportunities, procurement opportunities;*
- *There is a strong package of end use opportunities to ensure that Camden residents benefit from any scheme – e.g. end use apprenticeships, supported employment opportunities, work experience placements;*
- *The Council will explore and expect links and partnership working with Camden's STEAM Commission*

Transport

LBC Response

It is agreed that, subject to the measures outlined in the Scoping Report being put in place, significant effects relating to transport are unlikely to arise and that therefore this topic can be scoped out of the ES.

As is proposed, Transport Assessment supported by a Travel Plan for both the library and the commercial accommodation, Healthy Streets Transport Assessment, parking arrangement plan and delivery and servicing management plan should be provided with the planning application which detail how traffic and transportation matters will be managed appropriately. It is recommended that the Applicant reviews and follows the Camden Planning Guidance on Transport.

In accordance with LBC Building Control's requirements, a full access statement should be provided alongside the planning application. The Applicant may decide whether this is best provided as a stand-alone document or within the scope of the Design and Access Statement or TA.

Comments from TfL and Crossrail 2 are provided below. The points raised by TfL should be considered when bringing forward the separate standalone planning reports referred to in the EIA Scoping Report and as the development progresses.

▪ **Transport for London response**

TfL is satisfied for transport to be scoped out of the EIA. The application should be supported by a Healthy Streets Transport Assessment, produced in line with TfL guidance. TfL's Healthy Streets TA guidance is available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments?intcmp=10094>

TfL would welcome pre-application engagement with the applicant team for this site.

Overall, the scope in relation to TfL's TA requirements is acceptable but TfL would strongly encourage the applicant to engage in discussions with TfL in the lead up to submission.

▪ **Crossrail 2 response**

Transport for London (TfL) administers the Crossrail 2 Safeguarding Direction made by the Secretary of State for Transport on 24 March 2015.

With reference to your letter to TfL dated 10 May 2021, requesting the views of the Crossrail 2 Project Team on the above application, I confirm that the location of the proposed development as set out in the Scoping Report falls within the Limits of Safeguarding for Crossrail 2.

In the event of a future application for planning permission being submitted the borough is required by the Directions to notify TfL/Crossrail 2. Notification of any future application for planning permission should be forwarded to Crossrail2@tfl.gov.uk

The Scoping Report accompanying the submission refers to Crossrail 2 and provides an outline of the extent of the Crossrail 2 works that are proposed to form part of a future

application for planning permission. Other than acknowledging the inclusion of the Crossrail 2 works in the Scoping Report, TfL/Crossrail 2 has not reviewed the document further. This view is given without prejudice to any response from other parts of TfL or the Mayor's decision on this submission.

The latest project developments can be found on the Crossrail 2 website

www.crossrail2.co.uk

Waste and materials

It is agreed that, subject to the measures outlined in the Scoping Report being put in place, significant effects relating waste are unlikely to arise and that therefore this topic can be scoped out of the ES.

As is proposed, a Circular Economy Statement and Delivery and Servicing Management Plan should be provided with the planning application which detail how waste and materials will be managed appropriately.

Water resources, flood risk and drainage

LBC Response

It is agreed that, subject to the measures outlined in the Scoping Report being put in place, significant effects relating to water resources, flood risk and drainage are unlikely to arise and therefore this topic can be scoped out of the ES.

As is proposed, a Flood Risk Assessment and Drainage Strategy (detailing the SuDS to be utilised where appropriate) should be provided with the planning application which details how flood risk and surface water drainage will be managed appropriately. As is also proposed, the draft CMP to be submitted with the planning application should detail measures for managing demolition and construction related water pollution to ensure that significant adverse effects do not occur.

Comments from LBC as Local Lead Flood Authority, Thames Water and the Environment Agency are provided below. These points should be considered when bringing forward the separate standalone planning reports referred to in the EIA Scoping Report and as the development progresses. It is acknowledged that the matters raised by Thames Water can be dealt with outside of the EIA process, within other standalone planning documents.

▪ **Local Lead Flood Authority response**

Site and flood risk

As with the rest of Camden the national designation is confirmed as Flood Risk Level 1 including national Low Risk for surface water.



The maps above show that the very eastern part of the site overlaps with the King's Cross Local Flood Risk Zone. This is designated locally by the Strategic Flood Risk Assessment (Updated Maps 2015) for reasons of surface water flood risk. The scheme is therefore defined

as an 'area at risk of flooding' which attracts particular planning requirements as stated in the Local Plan under Policy CC3, and guidance in CPG Water and Flooding. These include a Flood Risk Assessment.

There are no historically flooded streets nearby.

The EA's long-term flood risk mapping indicates non-trivial results on the site under the Low, Medium and High Risk scenarios:



Extent of surface water flooding at site



Water velocities under Low (left), Medium (centre) and High Risk scenarios



EIA Scoping Report

This states that:

The Proposed Development is not a source of hazard that could result in a major accident, nor would it interact with an external source of hazard (such as being located in proximity to a hazardous site) and potentially increase the risk of that hazard occurring at its external source. Additionally, if an external disaster was to occur (e.g. flood, storm, fire), the presence of the Proposed Development is not expected to increase the risk of serious damage to an

environmental receptor occurring when compared to the baseline of the same hazard occurring without the Proposed Development. The Construction (Design and Management) Regulations 201581 process will serve to identify and manage any such risks. A Flood Risk Assessment (FRA) will be submitted within the Sustainability Statement along with the planning application and is expected to demonstrate that there is no increase in flood risk as a result of the Proposed Development.

And also (p. 64):

Any potential adverse effects from the Proposed Development on flood risk and increased vulnerability due to climate change would be prevented through good design, including by achieving acceptable surface water run-off rates. The new drainage network would be designed to the following standards:

- No flooding on site from a 1:30 year storm event
- No flooding which may pose a significant risk to people and property from a 1:100 year storm (including a 40% allowance for climate change).
- The area of the Site is greater than 1 hectare and so a FRA will be required to be submitted as part of the Sustainability Statement with the planning application. The FRA and accompanying drainage strategy are expected to demonstrate that there is no increase in flood risk as a result of the Proposed Development. The FRA and drainage strategy would adhere to all relevant policy and guidance, including the Flood Risk Regulations (2009), Section 14, paragraphs 155-165; Meeting the challenge of climate change, flooding and coastal change of the NPPF and the National Planning Practice Guidance (First published 2014) issued to ensure the effective implementation of the NPPF and containing a section covering Flood Risk and Coastal Change. The national, regional and local policy that inform the FRA and drainage strategy would be described in the FRA.
- A draft CMP will be submitted with the planning application. This document would ensure that appropriate controls (including any necessary monitoring measures) are applied during construction to prevent or reduce adverse effects on the environment.
- Potential effects of the Proposed Development on potable water supply and foul water drainage would be managed through engagement with Thames Water Utilities Limited.
- Potential effects of the Proposed Development on aquifers are described in the Contaminated land section above; this includes reference to the production of a separate FWRA which would ensure measures are implemented to prevent creation of contamination migration pathways to deep aquifers.

Comments from Local Lead Flood Authority (continued)

We note the items above in the EIA.

In addition, due to the scale and location, at planning stage the applicant will be expected to submit:

- Flood Risk Assessment and Surface Water Drainage Statement
- Camden Flood Risk Pro-forma as well as the GLA SuDS Pro-forma
- Basement Impact Assessment if appropriate

Supporting documents including drawings detailing the proposed drainage, extent and position of SuDS, and flood risk mitigation measures, Microdrainage or equivalent runoff and volume calculations, lifetime maintenance plan for SuDS including management of related health and safety issues, drawing of overland flow routes showing no increased risk to the

public and surrounding properties, evidence of site surveys and investigations relating to drainage, capacity confirmation from Thames Water or evidence of correspondence.

The proposals will be expected to meet the NPPF standards, national non-technical standards, London Plan policy and Camden policy and guidance for development in a surface water flood risk area. For example the designs should (include but not limited to):

- be designed to resist flooding and to cope with being flooded*
- achieve greenfield run-off rates*
- constrain run-off volumes to greenfield run off volumes for the 1 in 100 year 6 hour event*
- include SuDS unless demonstrated to be inappropriate*
- follow the drainage hierarchy in policy SI 13 of the London Plan*

Summary

We have no major objection in regard to the EIA scoping report.

However the observations would be incomplete with respect to local flood risk policy, and the informatives above should taken on board for the pre-application advice process and in the full planning application.

▪ Environment Agency response

The Environment Agency is a statutory consultee on all development projects subject to Environmental Impact Assessment. There are however, no environmental constraints within our remit on this site and we therefore have no comments at this time.

▪ Thames Water Response

Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission:

- 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met.*
- 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met.*
- 3. The developments demand for water supply and network infrastructure both on and off site and can it be met.*
- 4. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation.*
- 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>*

Other matters

The EIA Scoping Report makes reference to the London Plan (2016) and the draft/intend to publish London Plan. It should be noted that the London Plan (2021) has now been adopted by the GLA and therefore this should be taken into consideration in bringing forward the planning application.

Beyond the scope of the EIA, and comments highlighted, Network Rail have raised a number of further points that should be addressed as the development comes forward outside of the EIA

process. Their response is appended to this EIA Scoping Opinion for your information and onward consideration.

London Underground Infrastructure Protection have highlighted that they have no comments to make on the EIA scoping. However, they have highlighted that the developer should consult with TfL Infrastructure Protection team for review of Ground Movement Assessment and detailed design outside of the EIA process.

No response has been received on the EIA Scoping Opinion consultation from the following parties:

- LBC (London Borough of Camden) – Building Control;
- LBC – Conservation;
- LBC – Green Space;
- LBC – Sustainability;
- LBC – Environmental Health (noise and air quality);
- LBC – Transport;
- LBC – Tree Management;
- LBC – Urban Design;
- Greater London Archaeological Advisory Service;
- Council for British Archaeology;
- Greater London Authority (GLA);
- HS2 Ltd;
- Natural England;
- Metropolitan Police Service; and
- NHS North Central London Clinical Commissioning Group (CCG)

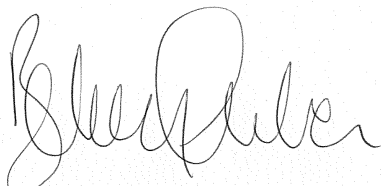
I trust that this provides a comprehensive response to the request for a Scoping Opinion submitted by the Applicant. Should responses be received after the issue of this response they will be forwarded to you for consideration and inclusion within the ES.

Please note that this Scoping Opinion is offered with the caveat that should the form of development deviate to a significant degree from that described within the Scoping submission, a further request for a Scoping Opinion may prove necessary. In addition, this Scoping Opinion is offered without prejudice to the right, if necessary, to raise further issues for consideration as part of the future assessment of the proposals.

Scoping should be an iterative process. Recommendations for additional consultations with key consultees have been made in this Scoping Opinion to further agree the scope of certain assessments. We recommend that all consultation responses, including those going forward, are included within the ES to provide clarity on all discussions regarding assessment scopes.

Should you have any questions or queries, please do not hesitate to contact Jennifer Walsh on 020 7974 3500 (Jennifer.Walsh@camden.gov.uk).

Kind regards



Bethany Cullen
Head of Development Management

Appendix 1: Consultation Responses

From: contaminatedland <contaminatedland@camden.gov.uk>

Sent: 27 May 2021 18:05

To: Jennifer Walsh <Jennifer.Walsh@Camden.gov.uk>

Cc: Julian Diaz <Julian.Diaz@camden.gov.uk>

Subject: RE: Consultee letter for PlanningApplication Application: 2021/2164/P

Dear Jennifer

Thank you for your email below.

Within the EIA Scoping Report provided as part of the above planning application, it has been specified that contaminated land has been scoped out of the EIA Scoping Report as a separate Geotechnical Desk Study and Contamination Risk Assessment has been prepared and will be submitted with the planning application in accordance with Environment Agency (Land Contamination: Risk Management⁷⁸) and Camden Council guidance. The applicant is not asking for contaminated land to be considered as part of this EIA Scoping Application.

This application suggests that contaminated land will be considered at the full planning application stage.

If you have any further queries, please do not hesitate to contact me.

Kind regards

Tracey Martin

Pollution EHO

Telephone: 020 7974 2737

From: Nature Conservation <NatureConservation@camden.gov.uk>

Sent: 26 May 2021 14:50

To: Jennifer Walsh <Jennifer.Walsh@Camden.gov.uk>; Nature Conservation <NatureConservation@camden.gov.uk>

Subject: RE: Consultee letter for PlanningApplication Application: 2021/2164/P

Hi Jennifer,

I have no comment to make on the scoping report, beyond welcoming the commitment to explore opportunities to incorporate biodiversity enhancements.

Kind regards

Greg

Greg Hitchcock

Nature Conservation Officer

Telephone: 020 7974 4937

From: Gabriel Berry-Khan <Gabriel.Berry-Khan@camden.gov.uk>
Sent: 27 May 2021 19:11
To: Jennifer Walsh <Jennifer.Walsh@Camden.gov.uk>
Subject: 2021/2164/P British Library - EIA scoping - LLFA

Hi Jen

Thank you for the consultation. My comments on behalf of the LLFA are below.

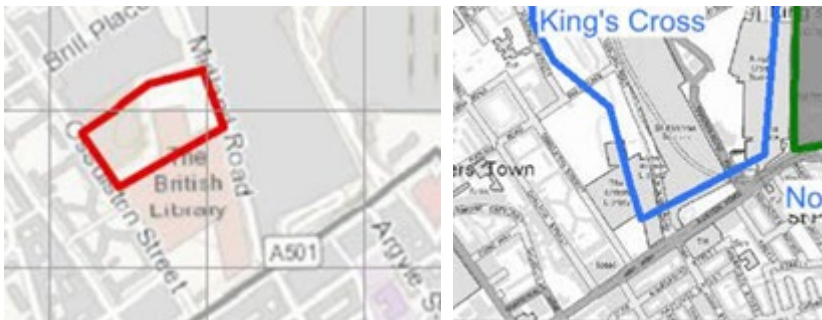
Scheme

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 73,000 sqm of commercial space; 10,000 sqm of new library accommodation and the Alan Turing Institute; 1,700 sqm 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.

Classification: Major non-residential new-build, referable to the Mayor of London.

Site and flood risk

As with the rest of Camden the national designation is confirmed as Flood Risk Level 1 including national Low Risk for surface water.



The maps above show that the very eastern part of the site overlaps with the King's Cross Local Flood Risk Zone. This is designated locally by the Strategic Flood Risk Assessment (Updated Maps 2015) for reasons of surface water flood risk. The scheme is therefore defined as an 'area at risk of flooding' which attracts particular planning requirements as stated in the Local Plan under Policy CC3, and guidance in CPG Water and Flooding. These include a Flood Risk Assessment.

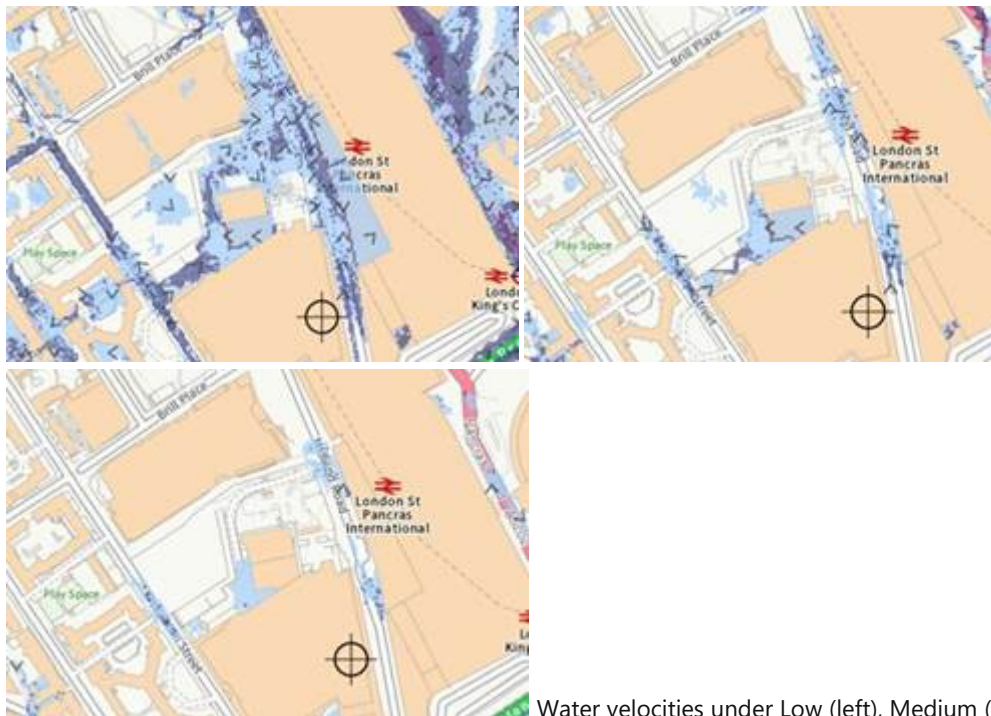
There are no historically flooded streets nearby.

The EA's long-term flood risk mapping indicates non-trivial results on the site under the Low, Medium and High Risk scenarios:



Extent of surface water flooding at site

High
 Medium
 Low
 Very low



Water velocities under Low (left), Medium (centre) and High Risk

scenarios

Over 0.25 m/s
 Less than 0.25 m/s
 Direction of water flow

EIA Scoping Report

This states that:

The Proposed Development is not a source of hazard that could result in a major accident, nor would it interact with an external source of hazard (such as being located in proximity to a hazardous site) and potentially increase the risk of that hazard occurring at its external source. Additionally, if an external disaster was to occur (e.g. flood, storm, fire), the presence of the Proposed Development is not expected to increase the risk of serious damage to an environmental receptor occurring when compared to the baseline of the same hazard occurring without the Proposed Development. The Construction (Design and Management) Regulations 2015⁸¹ process will serve to identify and manage any such risks. A Flood Risk Assessment (FRA) will be submitted within the Sustainability Statement along with the planning application and is expected to demonstrate that there is no increase in flood risk as a result of the Proposed Development.

And also (p. 64):

Any potential adverse effects from the Proposed Development on flood risk and increased vulnerability due to climate change would be prevented through good design, including by achieving acceptable surface water run-off rates. The new drainage network would be designed to the following standards:

- No flooding on site from a 1:30 year storm event
- No flooding which may pose a significant risk to people and property from a 1:100 year storm (including a 40% allowance for climate change).
- The area of the Site is greater than 1 hectare and so a FRA will be required to be submitted as part of the Sustainability Statement with the planning application. The FRA and accompanying drainage strategy are expected to demonstrate that there is no increase in flood risk as a result of the Proposed Development. The FRA and drainage strategy would adhere to all relevant policy and guidance, including the Flood Risk

Regulations (2009), Section 14, paragraphs 155-165; Meeting the challenge of climate change, flooding and coastal change of the NPPF and the National Planning Practice Guidance (First published 2014) issued to ensure the effective implementation of the NPPF and containing a section covering Flood Risk and Coastal Change. The national, regional and local policy that inform the FRA and drainage strategy would be described in the FRA.

- A draft CMP will be submitted with the planning application. This document would ensure that appropriate controls (including any

necessary monitoring measures) are applied during construction to prevent or reduce adverse effects on the environment.

- Potential effects of the Proposed Development on potable water supply and foul water drainage would be managed through engagement with Thames Water Utilities Limited.

- Potential effects of the Proposed Development on aquifers are described in the Contaminated land section above; this includes reference to the production of a separate FWRA which would ensure measures are implemented to prevent creation of contamination migration pathways to deep aquifers.

Comments

We note the items above in the EIA.

In addition, due to the scale and location, at planning stage the applicant will be expected to submit:

- Flood Risk Assessment and Surface Water Drainage Statement
- Camden Flood Risk Pro-forma as well as the GLA SuDS Pro-forma
- Basement Impact Assessment if appropriate
- Supporting documents including drawings detailing the proposed drainage, extent and position of SuDS, and flood risk mitigation measures, Microdrainage or equivalent runoff and volume calculations, lifetime maintenance plan for SuDS including management of related health and safety issues, drawing of overland flow routes showing no increased risk to the public and surrounding properties, evidence of site surveys and investigations relating to drainage, capacity confirmation from Thames Water or evidence of correspondence.

The proposals will be expected to meet the NPPF standards, national non-technical standards, London Plan policy and Camden policy and guidance for development in a surface water flood risk area. For example the designs should (include but not limited to):

- [be designed to resist flooding and to cope with being flooded](#)
- [achieve greenfield run-off rates](#)
- [constrain run-off volumes to greenfield run off volumes for the 1 in 100 year 6 hour event](#)
- [include SuDS unless demonstrated to be inappropriate](#)
- [follow the drainage hierarchy in policy SI 13 of the London Plan](#)

Summary

We have no major objection in regard to the EIA scoping report.

However the observations would be incomplete with respect to local flood risk policy, and the informatives above should be taken on board for the pre-application advice process and in the full planning application.

Thanks,

Gabriel Berry-Khan

From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Sent: 24 May 2021 12:09

To: Jennifer Walsh <Jennifer.Walsh@Camden.gov.uk>; Planning <Planning@camden.gov.uk>

Subject: RE: Consultee letter for PlanningApplication Application: 2021/2164/P

Jennifer

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

The Proposed Work:

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.

I can confirm that the planning applicant is in communication with London Underground engineers with regard to the development above. Therefore, we have no comment to make on the application except that the developer should consult with TfL Infrastructure Protection team for review of Ground Movement Assessment and detailed design.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards

Shahina Inayathusein MAPM MIAM
Safeguarding Engineer (LU+DLR)
Infrastructure Protection - TfL Engineering
Email: locationenquiries@tube.tfl.gov.uk
Find out more about Infrastructure Protection - <https://youtu.be/0hGoJMTBOEg>

TfL Spatial Planning Reference: CMDN/21/22

Borough Reference: 2021/2164/P

Location: Land to the North of the British Library, 96 Euston Road

Proposal: 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.

Many thanks for consulting TfL on the above application. TfL offer the following comments:

TfL is satisfied for transport to be scoped out of the EIA. The application should be supported by a Healthy Streets Transport Assessment, produced in line with TfL guidance. TfL's Healthy Streets TA guidance is available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments?intcmp=10094>

TfL would welcome pre-application engagement with the applicant team for this site.

Overall, the scope in relation to TfL's TA requirements is acceptable but TfL would strongly encourage the applicant to engage in discussions with TfL in the lead up to submission.

If you have any queries please do not hesitate to contact me.

Many thanks

Max

Max Faulkner

North Team Area Planner | Spatial Planning | City Planning

07891497435

9th Floor, 5 Endeavour Square, Stratford, London E20 1JN

Email: maxfaulkner@tfl.gov.uk

From: Paul Willmott <Paul.Willmott@rpsgroup.com>

Sent: 03 June 2021 08:45

To: Jennifer Walsh <Jennifer.Walsh@Camden.gov.uk>

Cc: Alex Bushell <Alex.Bushell@camden.gov.uk>; Nick Carter <nick.carter@crick.ac.uk>; Darren Warrington <darren.warrington@crick.ac.uk>; Mervyn Dunwoody <Mervyn.Dunwoody@Crick.ac.uk>; Anna Murray <Anna.Murray@rpsgroup.com>

Subject: British Library - EIA Scoping

Dear Jennifer,

Thank you for giving the Francis Crick Institute the opportunity to comment on the above Environment Impact Assessment Scoping Report (EIA) which we are submitting as agreed with Alex last week.

As I am sure you are aware, the potential impact of the British Library's proposals are relevant to the Crick and the work the Institute undertakes day to day. The EIA scoping is a comprehensive and robust document and we have little that we would wish to comment on, but we have outlined some elements below that we ask are taken into consideration moving forward, by the Council and/or the developers within the EIA and/or future planning application submission. We should add however that the Crick has been working with the Library and it's team and we continue to do so, and we very much hope that these elements will be addressed before the submission of the application.

Air Quality

The development proposals include uses such as life sciences. Dependant on the type of life science activities that occupy the proposed building there maybe potential for relevant emissions from the building associated with these uses. Consideration should be given to whether the life science uses will include containment facilities, which is likely, and if so to what level and how will extraction requirements be incorporated into the building. Extraction, flue location and heights of flues to ensure relevant dispersion are an important consideration under Air Quality.

During the evolution of the Crick's proposals it was necessary to raise the height of the flues on our building to ensure adequate dispersion of materials (and possible odours) so as not to impact residential development to the north and this was a factor in the design of the upper floors of Brill Tower. The assessment of potential effects arising from this particular use must have regard to the existence of the Crick, to the north, and to climate conditions, so that the cumulative impacts of both developments are considered against sensitive receptors adjacent to the combined sites; specifically Brill Tower (currently under construction) that sits in the prevailing wind direction from the development site.

Electronic Interference

The scoping makes reference to the potential impacts on the Airwave network, the emergency services communications system, but it should be noted that this is being replaced by the Emergency Services Network (ESN). Although delayed ESN is now scheduled to be operational in 2025/26, whilst the proposed construction will be taking place. Whilst ESN hopes to use the existing mast network, additional masts are having to be provided in urban areas and the assessment should factor in both Airwave and ESN or require a future addendum if data is not currently available, when ESN is commissioned.

With respect to terrestrial TV and radio, although it was not expected that the Crick would cause any disruption, some did occur to a number of residential uses to the north/north-east and we believe the Brill Tower proposals considered impacts to terrestrial TV and radio. We agree that it is unlikely that there would be any interference arising from the Library building but this should not be ruled out in its entirety.

There are no specific references to EMI impacts on the Crick during construction or in operation, nor are there any comments on the building and equipment sensitivity to impacts of this nature. Activities within the Crick have the

potential to be susceptible to EMI. This should be factored into the scoping although in all likelihood mitigation may be a localised issue arising when an issue arises.

Environmental Wind

The Crick would have concern should the pedestrianised Dangoor Walk become a wind tunnel as a result of the proposed development, and initial modelling should be undertaken. The Crick would be extremely concerned if the proposed mitigation impacted the use of Dangoor Walk particularly in respect to the comment made that 'regulating the use of the space' may be one solution.

Dangoor Walk is already established and the impact of wind would affect Dangoor Walk as well. How would the suggested mitigation measures be applied to land outside the application site and how does this rationalise the Council's requirement to ensure a permeability route across the site?

Noise & Vibration

As with the Brill Tower proposals, this is the greatest area of concern for the Crick and has the potential to directly impact the future operations of the Institute. Reference to the sensitivity of the Francis Crick Institute is referred to in Section 5.8.2. The Crick's most sensitive activities are located to the south side of its building and these will need to be carefully considered (like they have been for Brill Place Tower (BPT) proposals).

As outlined in the Scoping Report, there could be 'temporary significant adverse vibration effects' on the Crick arising from construction and we would like to draw attention to issues that have arisen in respect Brill Place Tower. Arrangements were introduced with the developers of BPT to minimise and manage these issues. We would expect that the British Library would look to a mitigation solution that involves close cooperation with the Crick, as has been undertaken with BPT, throughout the construction and that this is incorporated into the Environmental Statement.

The key to setting the relevant mitigation strategy will be the baseline noise and vibration studies and we suggest that the baseline studies include monitoring points in the Crick where these will likely be maintained through the construction phase for monitoring purposes. In any planning application submission, the Crick will seek to work closely and collaboratively with the developers (as it did with BPT) to set noise/vibration thresholds and how exceedances will be managed and responded too, if and when they occur.

With respect to noise, if the proposed development is to have standby generators associated with the ongoing uses, which is likely given that the Alan Turing Institute is to be located within the development, and life sciences are a specific land use, then consideration must be given to the impact that these might have in the event of a significant electrical outage requiring black start and this needs to also consider the cumulative impact of standby generators at both the British Library and the Crick may have in noise terms. As such the base study needs to extend beyond the site to factor in the wider physical environment.

It would be worth noting that this area has previously (2019) had a full outage over a number of days as a result of the failure of the local UKPN sub-station; which exists as a single point of failure. During this period the Crick's emergency generators operated as they were expected to do, but this was continuously until power was restored.

Townscape

We understand that the proposals may extend landscaping features on to land owned by the Crick. Whilst the Crick will review these when formally consulted on by the developers, and are not necessarily adverse to this, consideration will need to be given to how these impact on the Crick's S.106 obligations. As the Council is aware, the Crick is in the process of planning for the re-commence of its local community engagement activities, having been suspended due to Covid, and areas such as the forecourt has always been identified as a primary location for exhibition/community related activity.

As such, whilst we have no specific comment at this time on the scoping of the townscape component of the EIA, we will be particularly interested in the townscape at the eastern end of the site (Midland Road) and views north/south.

Finally, and although not a matter for the EIA, we would like to flag that from our own application we are aware that this area specifically, and it's surroundings, was bombed on several occasions during WW2 and would request that any application is supported by the provision of a UXO study given that history. We believe that the developers may already have indicated that they are intending to prepare a suitable report already,

Please do not hesitate to contact us should you have require any clarification or have any queries on the above comments.

Kind regards,

Paul

Paul Willmott OBE

Managing Director Planning

RPS | Consulting UK & Ireland

20 Farringdon Street

London, EC4A 4AB, United Kingdom

T +44 20 3691 0500

D +44 20 7280 3389 M +44 7999 131 346

E paul.willmott@rpsgroup.com

[Click for my digital business card](#)

Follow us on: [rpsgroup.com](https://www.rpsgroup.com) | [LinkedIn](#) | [Facebook](#) | [Instagram](#) | [YouTube](#)

Alberto Aponte

From: BCTAdmin@thameswater.co.uk
Sent: 12 May 2021 12:58
To: Planning
Subject: 3rd Party Planning Application - 2021/2164/P

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

London Borough of Camden Our DTS Ref: 65161
Camden Town Hall Your Ref: 2021/2164/P
Argyle Street
Euston Road
London
WC1H 8EQ

12 May 2021

Dear Sir/Madam

Re: LAND TO NORTH OF THE BRITISH LIBRARY, 96 EUSTON ROAD, LONDON, NW1 2DB

Waste Comments

.

Water Comments

Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,

Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to devcon.team@thameswater.co.uk

Visit us online www.thameswater.co.uk , follow us on twitter www.twitter.com/thameswater or find us on www.facebook.com/thameswater. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.



planning@camden.gov.uk

London Borough of Camden
5 Pancras Square
Town Hall,
Judd Street
London
WC1H 9JE

21 May 2021
Crossrail 2 Ref: CR2-3673-2021

Transport for London
Crossrail 2

Safeguarding Manager
4th Floor, North Wing
55 Broadway
London
SW1H 0BD

Phone: 020 3054 7018
www.TfL.gov.uk

Dear Jennifer Walsh,

2021/2164/P :

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

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.

Transport for London (TfL) administers the Crossrail 2 Safeguarding Direction made by the Secretary of State for Transport on 24 March 2015.

With reference to your letter to TfL dated 10 May 2021, requesting the views of the Crossrail 2 Project Team on the above application, I confirm that the location of the proposed development as set out in the Scoping Report falls within the Limits of Safeguarding for Crossrail 2.

In the event of a future application for planning permission being submitted the borough is required by the Directions to notify TfL/Crossrail 2. Notification of any future application for planning permission should be forwarded to Crossrail2@tfl.gov.uk

The Scoping Report accompanying the submission refers to Crossrail 2 and provides an outline of the extent of the Crossrail 2 works that are proposed to form part of a future application for planning permission. Other than acknowledging the inclusion of the Crossrail 2 works in the Scoping Report, TfL/Crossrail 2 has not reviewed the document further. This view is given without prejudice to any response from other parts of TfL or the Mayor's decision on this submission.

The latest project developments can be found on the Crossrail 2 website
www.crossrail2.co.uk

I hope this information is helpful, but if you require any further information or assistance then please email crossrail2@tfl.gov.uk

Yours sincerely,



MAYOR OF LONDON



VAT number 756 2770 08

Michael Johnson, Safeguarding Manager.

Thank you for consulting Sport England.

Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently we do not wish to comment on the Screening or Scoping Opinion consultation.

Any subsequent planning application should however consider the implications for sport in the context of NPPF Para's 96 and 97, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003).

General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

If you need any further advice please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team

E: Planning.south@sportengland.org



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Louise Hartley](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/>. If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org



Seana Heaney
Network Rail -
Planning,
1 Stratford Place,
London, E15 1AZ

Planning Department

By email only

27/05/2021

Network Rail Consultation Response

Application reference:	2021/2164/P
Location:	Land to the north of the British Library
Recommendation:	No objection - informatives

Thank you for consulting Network Rail regarding the above planning application. It is strongly recommended that the developer contacts Network Rail's Asset Protection and Optimisation team via AssetProtectionAnglia@networkrail.co.uk prior to works commencing on site.

Network Rail strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure.

Buried Services

Any works by the developer on the land adjacent to NR infrastructure will need to be undertaken following engagement with NR ASPRO to determine the interface with NR assets, buried or otherwise and by entering into a BAPA (Basic Asset Protection

Agreement), with a specified minimum notice period before commencement of physical works on the site.

The developer is responsible for a detailed services survey to locate the position, type of services, including buried services, in the vicinity of railway and development site. Any utility services identified shall be brought to the attention of Senior Asset Protection Engineer (SAPE) in Network Rail if they belong to railway assets. The SAPE will ascertain and specify what measures, including possible re-location and cost, along with any other asset protection measures shall be implemented by the developer.

Site Layout

It is recommended that all buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance work to be carried out without involving entry onto Network Rail's infrastructure. Where trees exist on Network Rail land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines.

Existing railway infrastructures should not be loaded with additional surcharge from the proposed development unless the agreement is reached with Network Rail. Stability of the ground / embankment adjacent to the railway should not be loaded with increased surcharge to mitigate the risk of instability of the ground which can cause the settlement on Network Rail infrastructure.

Piling

The developer must ensure that any piling work near or adjacent to the railway does not cause an operational hazard to Network Rail's infrastructure. Impact/Driven piling scheme for a development near or adjacent to Network Rail's operational infrastructure needs to be avoided, due to the risk of a major track fault occurring. No vibro-compaction/displacement piling plant shall be used in development. Where piling equipment / plant is to be used in the development, foundation design and details of the use of such machinery and a method statement should be submitted for the approval of Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

Excavations/ Earthworks

All excavations / earthworks carried out in the vicinity of Network Rail's property / structures must be designed and executed such that no interference with the integrity of that property / structure can occur. If temporary compounds are to be located adjacent to the operational railway, these should be included in a method statement for approval by Network Rail. Prior to commencement of works, full details of excavations and earthworks to be carried out near the railway undertaker's boundary fence should be submitted for approval of the Local Planning Authority acting in consultation with the railway undertaker and the works shall only be carried out in accordance with the approved details. Where development may affect the railway, consultation with the Asset Protection Engineer should be undertaken.

Environmental issues

The design and siting of buildings should take into account the possible effects of noise and vibration and the generation of airborne dust resulting from the operation of the railway.

Scaffolding, Plants & Cranes

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must always be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials can fall within 4.0m of the boundary with Network Rail. Operation of mobile cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail'. Operation of Tower Crane should also comply with CPA Good Practice Guide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Operation of Piling Rig should comply with Network Rail standard 'NR-L3-INI-CP0063 - Piling adjacent to the running line'. Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary. Any scaffold which is to be constructed adjacent to the railway boundary fence must be erected in such a manner that at no time will any poles fall within the platform and 3.00 metres from the live OHLE and protective netting around such scaffold must be installed.

Construction activities

The applicant shall provide all construction methodologies relating to works that may import risks onto the operational railway and potential disruption to railway services, the assets and the infrastructure for acceptance prior to commencing the works. All works must also be risk assessed to avoid disruptions to the operational railway

I trust the above clearly sets out Network Rail's position on the planning application. Should you require any more information from Network Rail, please do not hesitate to contact me.

Kind regards,

Seana Heaney

Town Planning Technician

Network Rail | Property | Anglia Region

1 Stratford Place | London | E15 1AZ

M 07395 390449

E Seana.Heaney@networkrail.co.uk

www.networkrail.co.uk/property

Jennifer Walsh
London Borough of Camden
Development Control
Town Hall Extension Argyle Street
London
WC1H 8EQ

Our ref: NE/2021/133274/01-L01
Your ref: 2021/2164/P
Date: 11 May 2021

Dear Jennifer,

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.

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

Thank you for consulting us on the above application which we received on 10 May 2021.

Environment Agency Position

The Environment Agency is a statutory consultee on all development projects subject to Environmental Impact Assessment. There are however, no environmental constraints within our remit on this site and we therefore have no comments at this time.

Final Comments

Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us. Please provide us with a decision notice for our records.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

George Lloyd
Planning Advisor

Direct dial: +44 20302 54843

Direct e-mail: HNL.SustainablePlaces@environment-agency.gov.uk

End



INVESTOR IN PEOPLE





Historic England

Ms Jennifer Walsh
London Borough of Camden
Development Management
Town Hall
Judd Street
London
WC1H 9JE

Direct Dial: 0207 973 3777

Our ref: PL00749102

13 May 2021

Dear Ms Walsh

Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017

LAND TO NORTH OF BRITISH LIBRARY, 96 EUSTON ROAD, LONDON, NW1 2DB

Thank you for your letter regarding the scoping opinion. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

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,

Claire Brady
Inspector of Historic Buildings and Areas
claire.brady@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

planning@camden.gov.uk

14 May 2021

Crossrail Ref: CRL-IP-1855

Dear Jennifer Walsh,

2021/2164/P : Land to the North of the British Library 96 Euston Road London NW1 2DB

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.

Transport for London administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 10 May 2021 requesting the views of the Crossrail on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

The implications of the Crossrail proposals for the application have been considered and I write to inform you that Crossrail Limited does not wish to make any comment on the application as submitted.

For further information please contact:

CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik

Safeguarding Officer (Crossrail)

TfL Infrastructure Protection Team

Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....

Please note: please send, by email, all planning application consultations that are captured by the SoS Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

.....

Crossrail (The Elizabeth Line) is a proposed new railway that will link Heathrow and Maidenhead in the west to Shenfield and Abbey Wood in the east using existing Network Rail tracks and new tunnels under Central London.

The Crossrail Bill which was introduced into Parliament by the Secretary of State for Transport in February 2005 was enacted as the Crossrail Act on the 22nd July 2008.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24th January 2008. The Direction was extended on 29th April 2009 (Maidenhead to Reading) and 14th October 2009 (Abbey Wood to Gravesend and Hoo Junction).

You may inspect copies of Plans, Sections, Environmental Statements, Explanatory Notes and Non-Technical Summaries pertaining to Crossrail at specified Libraries, Local Authority Offices or directly from Crossrail Limited. For further information contact CRL_Safeguarding@tfl.gov.uk