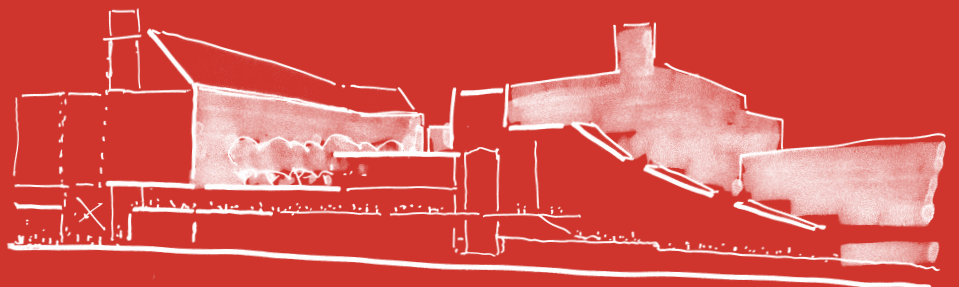


The British Library Extension
September 2022

Environmental Statement Addendum



The British Library Board and SMBL Developments Ltd

The British Library Extension

Environmental Statement Addendum

Reference: 249622

September 2022



This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 249622

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1. Introduction

1.1 Background

An application for full planning permission and listed building consent for the British Library Extension development in the London Borough of Camden (LBC) was submitted in March 2022 (refs: 2022/0141/P and 2022/1320/L respectively) accompanied by an Environmental Statement (the ‘ES’), dated January 2022, describing the likely significant effects on the environment that would result from the construction, existence and operation of the Proposed Development.

Buro Happold was appointed by Camden Council to review the Environmental Statement (ES) for the Proposed Development. In this role, they produced a report (the ‘Buro Happold initial report’¹) setting out 37 review comments where further environmental information and clarifications were requested. Arup provided a report setting out clarifications on behalf of the Applicant. Buro Happold then prepared a subsequent report (the ‘Buro Happold subsequent report’²) in which it was agreed that 21 of the clarifications made were sufficient to close out the associated review comments. The Buro Happold subsequent report is included as Appendix A, highlighting the comments made and clarifications provided.

Following engagement with Buro Happold on the 16 remaining review comments, an ES Addendum has been prepared setting out further environmental information. This report forms the ES Addendum and has been prepared and submitted as “further information” in accordance with Regulation 25 of the EIA Regulations³. It should be read alongside the ES, a copy of which is available on Camden Council’s planning portal⁴.

1.2 Approach

The 16 remaining review comments have been collated thematically as follows:

- Section 2 presents further information in relation to the summary of effects presented in Table 1 of ES Volume 1 (comment ID 1 in the Buro Happold subsequent report).
- Section 3 provides further information in relation to the construction programme (comment ID 5 in the Buro Happold subsequent report).
- Section 4 presents further information in relation to the assessment of alternatives (comment ID 6 in the Buro Happold subsequent report).
- Section 5 presents further information in relation to the assessment of interactive effects (comment ID 7 in the Buro Happold subsequent report).
- Section 6 provides further information in relation to the description of significant effects in the ES (comment IDs 10, 12, 17, 23, 26, 29 and 33 in the Buro Happold subsequent report).
- Section 7 presents further information in relation to the employment densities applied in the assessment of socio-economic effects (comment ID 31 in the Buro Happold subsequent report).
- Section 8 presents further information in relation to the assessment of cumulative socio-economic effects (comment ID 32 in the Buro Happold subsequent report).

In response to comment ID 35 in the Buro Happold subsequent report, a separately bound Updated Non-Technical Summary (NTS) has also been prepared and submitted. This provides a comprehensive summary of the EIA process and findings in accordance with the EIA Regulations. It follows the same format and

¹ Buro Happold (2022); The British Library Extension, Independent Review of Environmental Statement

² Buro Happold (2022); The British Library Extension, Subsequent report on the Independent Review of Environmental Statement

³ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended

⁴ Available online at: <http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:%222022/1041/P%22>

structure as the NTS submitted with the applications for planning permission and listed building consent and includes updates to align with the further information provided in this ES Addendum. The new information presented in the Updated NTS is highlighted blue, to aid the readers' understanding of changes that have been made.

Comment IDs 36 and 37 in the Buro Happold subsequent report present a number of "cross cutting issues". These are fully addressed in the sections of this ES Addendum listed above, but for clarity:

- Comment 36 relates to the description of significant effects in the ES, covered in Section 6.
- Comment 37, item 1 relates to the use of IEMA's ES Review Criteria. No action is required.
- Comment 37, item 2 relates to the construction programme, covered in Section 3.
- Comment 37, item 3 relates to the assessment of interactive effects, covered in Section 5.
- Comment 37, item 4 relates to the description of significant effects in the ES, covered in Section 6.
- Comment 37, item 5 relates to compliance with the scoping opinion. The information presented across this ES Addendum is considered to bring the ES into full compliance.
- Comment 37, item 6 relates to the assessment of alternatives, covered in Section 4.
- Comment 37, item 7 was closed with a clarification – see Appendix A.
- Comment 37, item 8 relates to the assessment of interactive effects, covered in Section 5.
- Comment 37, item 9 was closed with a clarification – see Appendix A.

Comment 37, item 10 relates to the construction programme, covered in Section 3.

2. Summary of effects presented in Table 1 of ES Volume 1

2.1 Summary of review

The Buro Happold initial report provided the following review comment with respect to the construction programme presented in the ES:

Table 1 does not summarise cumulative effects. Given that the table is titled “effects of the proposed development”, there is an argument to be made that this should include all effects as a result of the proposed development in isolation (including interactive effects on the same receptor) and also cumulatively alongside other proposed developments. Given there is no dedicated cumulative effects ES Chapter or conclusions chapter, and this table does not currently summarise all significant effects, it is our recommendation that an overall summary be provided that summarises all significant effects in an ES Addendum.

Arup’s response stated:

Table 1 lists only those effects considered to be significant. The topic assessments reported in ES Volumes 1 and 2 conclude there would not be any significant cumulative effects. Therefore, there are no likely significant cumulative effects to report in Table 1.

The Buro Happold subsequent report provided a further response, including a recommendation on information that should be included in an ES Addendum:

This does not appear to be entirely correct. Table 1 is titled “effects of the proposed development grouped by receptor”. There is commentary on insignificant and significant effects.

We understand the point in regard to no significant cumulative effects being predicted, however note the following:

- *There is currently no assessment of interactive effects in the ES*
- *There is currently no definitive conclusion on cumulative effects for socio-economics – presumably there are no significant cumulative effects, however is this possible when the effects in isolation are significant?*
- *It is not correct to say there are no significant cumulative effects. The greenhouse gas emissions assessment is inherently cumulative, as the ES states, and the effect would be significant. That effect is captured already.*

Recommendation: *discussion to be had with Arup to agree a way forward. The above points should be clarified before giving a final recommendation.*

2.2 Further information

This section presents further information in relation to the three bullet points quoted above from the Buro Happold subsequent report.

2.2.1 Assessment of interactive effects

The Buro Happold initial report raised this as a separate and specific comment with associated recommendations. This is discussed in detail in Section 5 of this ES Addendum.

2.2.2 Cumulative effects for socio-economics

The Buro Happold initial report raised this as a separate and specific comment with associated recommendations. This is discussed in detail in Section 8 of this ES Addendum.

2.2.3 Cumulative greenhouse gas emissions

Buro Happold acknowledges that this effect is “captured already” within Table 1 of ES Volume 1, and no further action is needed.

3. Construction Programme

3.1 Summary of review

The Buro Happold initial report provided the following review comment with respect to the construction programme presented in the ES:

The following information should also be provided in an ES Addendum:

- a) *Dates for the demolition of the BLCC and the fire escape structure;*
- b) *Dates for the excavation and construction of foundations and basement;*
- c) *Dates for implementing landscaping and public realm;*
- d) *Confirmation of dates of occupation for the different parts of the development (i.e., will there be phased occupation?). Also note that further discussion will be required on the need for an intermediate year scenario if occupation of the proposed development is phased.*

Arup's response stated:

The construction programme information presented in the ES is considered sufficient to allow assessment of the likely significant effects on the environment. In addition to the information presented in the description of the Proposed Development (Section 3 of ES Volume 1), assumptions regarding other key dates or durations in the construction programme are made clear in the relevant assessments (e.g. the air quality and noise and vibration assessments).

Phased occupation is not anticipated.

The Buro Happold subsequent report provided a further response, including a recommendation on information that should be included in an ES Addendum:

Regarding points a, b and c, this is not considered likely to be sufficient as these are fundamental components of the proposed development for which a programme has not been presented.

There is no date given for site set up and demolition / it is not clear when construction works will commence from the description given (potentially 2023, working back from 2029 completion?).

Recommendation: *it is Buro Happold's view that the ES should include reference to the aspects requested in points a, b and c which are all fundamental parts of the proposed development.*

Thank you for clarifying on point d. No further action is required on that aspect.

3.2 Further information

Table 1 below sets out the anticipated dates for the demolition of the BLCC and fire escape structure, excavation and construction of foundations and basement, and implementing landscaping and public realm. This information is consistent with that presented in the ES (Table 2 in ES Volume 1, *Summary of the main programme phases*), the assessments undertaken and reported therein, and the Draft Construction Management Plan, prepared by Real PM, submitted with the planning application. It reflects the currently anticipated programme of construction works and does not change the conclusions of the assessments presented in the ES. In the event the start dates specified in Table 1 in this ES Addendum and Table 2 in ES Volume 1, *Summary of the main programme phases*, are delayed for any reason, this is not regarded as likely to change any of the environmental effects of the Proposed Development as presented in the ES and this further information. Those effects would simply occur later than anticipated.

Table 1: Additional information for the 'Summary of the main programme phases'

Element	Start date	End date	Duration
Demolition of the BLCC and fire escape structure	April 2024	April 2026	24 months
Excavation and construction of foundations for New Tank Room	July 2024	Jan 2025	6 months
Excavation and construction of foundations for Western Building	January 2025	June 2027	29 months
Excavation and construction of foundations for Crossrail 2 shaft	September 2025	April 2027	18 months
Excavation and construction of foundations for Eastern Building	May 2026	May 2027	12 months
Implementing landscape and public realm	November 2028	November 2029	12 months

4. Alternatives

4.1 Summary of review

The Buro Happold initial report provided the following review comment with respect to the assessment of alternatives presented in the ES:

A comparison of the environmental effects of the alternatives considered by the applicant should be included in an ES Addendum to satisfy the EIA Regulations (2017) (as amended) – to include commentary on effect significance (i.e., whether significant effects would have occurred, when compared to the proposed development submitted for planning, if the alternatives had been implemented / is the difference significant or not).

Arup's response stated:

The EIA Regulations, Schedule 4 (2) require “an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”. The EIA Regulations are not more specific and do not require commentary on the relative significance of effects of the alternatives considered.

It is considered that Section 3.4 of ES Volume 1 satisfies the EIA Regulations by identifying changes made to the development to prevent and reduce potentially significant effects. For example, paragraph 3.4.17 identifies the moving of the Proposed Development to the east providing betterment, relative to earlier designs, for pedestrian access through level access from Midland Road and reduced vertical height difference with other buildings along Ossulston Street. It also identifies the moving of the Proposed Development east would provide improvements, relative to earlier design, for daylight and sunlight impacts for residencies on Ossulston Street. Another example is paragraph 3.4.20 which identifies that, following consultation with Camden Council, changes were made to the design roof, stair cores and stair enclosure, and pulling back the plant enclosure at roof level, so as to reduce impacts on views relative to earlier designs.

The Buro Happold subsequent report provided a further response, including a recommendation on information that should be included in an ES Addendum:

It is agreed that the wording of the regulations is open to interpretation. However, the focus of the EIA regulations is on whether effects are significant or not. Hence recommending that commentary on significance could/should have been provided, in addition to simply stating that improvements were made.

It is noted that the section describes changes made to reduce potentially significant environmental effects, however the text at paragraph 3.4.1 states “where relevant, compares the respective environmental effects with the other options studied” – which is as per the wording of the regulations.

Whilst it is stated that improvements were made in various places, this in itself does not directly compare the effect beyond the fact that it has been improved.

Recommendation: *remains unchanged i.e. our recommendation is that the consultant provides a comparison of the environmental effects, commenting on how the improvements made relate to significance (i.e. was a potentially significant effect avoided etc).*

4.2 Further information

Section 3.4 of ES Volume 1 presents the assessment of alternatives. The information from that section of the ES has been re-presented in Table 2, below. This describes aspects of the design of the Proposed Development where an alternative was considered, and relates this to the environmental impacts or benefits linked to design decisions related to specific performance of that alternative design aspect as presented in the ES, the assessment of the Proposed Development for the relative design aspect as presented in the ES and finally a comparison of the environmental performance of the alternative design aspect with the Proposed

Development. The final column includes commentary on whether the environmental performance of each alternative aspect would likely result in an improvement, be equal to, or a worsening of the effects (significant and non-significant) reported in the ES for the Proposed Development.

Table 2: Comparison of the environmental effects of alternatives with those of the Proposed Development

Design aspect	Environmental effects of the alternative option for the Design aspect, as described in the ES	Environmental effects of the Proposed Development, as presented in the ES	Qualitative representation of the difference in effects
<p>Site for BLCC relocation</p> <p>An alternative proposal that retained the BLCC in-situ was considered. This would have required the commercial parts of the Proposed Development to move to the perimeter of the Site.</p>	<p>As noted in the ES, this would result in harm to heritage assets and views (in particular critical heritage views across the Barlow Shed and of the original British Library), and the residual lighting levels within the BLCC itself (though it is noted that this is not an EIA matter).</p>	<p>Built heritage on-site</p> <p>The demolition of the BLCC would result in a permanent, direct, minor adverse, non-significant effect.</p> <p>The extension of the British Library, including the new BLCC building as part of the Proposed Development, would provide a large addition on a site originally planned for further British Library accommodation. This would result in a major beneficial, permanent, direct significant effect.</p> <p>Townscape, visual and off-site heritage</p> <p>No significant effects on the London View Management Framework⁵ views or designated borough views would occur as a result of the Proposed Development. There would be visual impacts on the settings of designated heritage assets but there would be no significant effects on the ability to appreciate their heritage significance. There would be significant localised townscape and visual effects on adjacent streets and some limited significant beneficial effects where streets and spaces align with the Proposed Development.</p>	<p>➔ Neutral. Neither the direct adverse nor the direct significant beneficial effect would occur had this alternative been pursued.</p> <p>↓ Worsening. The alternative design would have resulted in adverse and potentially significant effects on views and the settings of off-site designated heritage assets.</p>
<p>Three north-south buildings</p> <p>An alternative was considered in which the development was orientated in three north-south buildings (in the ES this is described as the 'Invitation to Submit Final Tender' (ISFT) design), whereas the Proposed Development contains two buildings oriented east-west.</p>	<p>As noted in the ES, it was considered that the three north-south buildings would place much greater mass close to neighbouring buildings on Ossulston Street, resulting in additional daylight and sunlight impacts on residential receptors.</p>	<p>Daylight, sunlight, overshadowing, solar glare and obtrusive light</p> <p>The Proposed Development would result in a negligible to minor adverse, non-significant daylight effect on some residential units at Chamberlain House on Ossulston Street, and a negligible to moderate adverse, significant daylight effect on some residential units at</p>	<p>↓ Worsening. The greater massing close to Ossulston Street in the alternative design would have resulted in a greater number of residential units experiencing significant daylight effects. There is also the potential that significant sunlight effects would have occurred in that scenario.</p>

⁵ GLA, London View Management Framework Supplementary Planning Guidance (LVMF SPG) (2012)

Design aspect	Environmental effects of the alternative option for the Design aspect, as described in the ES	Environmental effects of the Proposed Development, as presented in the ES	Qualitative representation of the difference in effects
		<p>Hadstock House and Levita House, both also on Ossulston Street.</p> <p>The Proposed Development would result in a negligible, non-significant sunlight effect to the three aforementioned buildings.</p> <p>The Proposed Development would result in a negligible, non-significant effect or no effect in terms of overshadowing at all amenity areas in the vicinity of the Site.</p> <p>The Proposed Development would result in a negligible to minor adverse, non-significant effect or no effect in terms of solar glare at all locations assessed.</p> <p>The Proposed Development would result in negligible, non-significant effects or no effect in terms of light pollution at all receptors.</p>	<p>The assessments of overshadowing, solar glare and light pollution would also have differed but it is not possible to determine whether significant effects would have occurred.</p>
<p>Eastern alignment of the northern wing</p> <p>An alternative was considered to locate the northern wing further west, closer to Ossulston Street.</p>	<p>As noted in the ES, this design would place much greater mass close to neighbouring buildings on Ossulston Street, resulting in additional daylight and sunlight impacts on residential receptors.</p>	<p>Daylight, sunlight, overshadowing, solar glare and obtrusive light</p> <p>As per row above</p>	<p>↓ Worsening. The greater massing close to Ossulston Street in the alternative design would have resulted in a greater number of residential units experiencing significant daylight effects. There is also the potential that significant sunlight effects would have occurred in that scenario.</p> <p>The assessments of overshadowing, solar glare and light pollution would also have differed but it is not possible to determine whether significant effects would have occurred.</p>
<p>Roof design</p> <p>An alternative was considered that had a taller height of the stair cores, higher stair enclosures on the southern part of the building and a higher plant enclosure at roof level.</p>	<p>As noted in the ES, this roof design would have had a greater impact on views and the settings of heritage assets.</p>	<p>Townscape, visual and off-site heritage</p> <p>No significant effects on the London View Management Framework views or designated borough views would occur as a result of the Proposed Development. There would be visual impacts on the settings of designated heritage assets but there would be no significant effects on the ability to appreciate their heritage significance. There would be significant</p>	<p>↓ Worsening. The alternative design would have resulted in adverse and potentially significant effects on views and the settings of off-site designated heritage assets.</p>

Design aspect	Environmental effects of the alternative option for the Design aspect, as described in the ES	Environmental effects of the Proposed Development, as presented in the ES	Qualitative representation of the difference in effects
		localised townscape and visual effects on adjacent streets and some limited significant beneficial effects where streets and spaces align with the Proposed Development.	

5. Assessment of interactive effects

5.1 Summary of review

The Buro Happold initial report provided the following review comment with respect to the assessment of interactive effects presented in the ES:

There is currently no assessment of interactive effects provided in the ES, i.e., an assessment of the overall effect when there are several different effects to the same receptor. This was requested in the EIA Scoping Opinion and is a requirement of the IEMA Review Criteria and the EIA Regulations (2017). This assessment should be provided in an ES Addendum.

Arup's response stated:

Table 1 in Section 1 of ES Volume 1 lists the conclusions of the EIA assessments by receptor. This allows a reader to understand where interactive effects may occur. As is clear from the table, there are no receptors that would experience concurrent significant adverse (or beneficial) effects. There are therefore no interactive effects to report.

The Buro Happold subsequent report provided a further response, including a recommendation on information that should be included in an ES Addendum:

Paragraph 1.2.1 states that Table 1 "allows the aggregation of these 'interactive effects' to be understood." However, there is no commentary or assessment of whether an interactive effect occurs or not and whether this is significant. The consultant has confirmed adjacent that they are not anticipating any interactive effects to report, however for completeness we recommend that this should be reported in the ES / an update to the ES.

The consultant states that no receptors would experience concurrent significant effects, however there is no commentary on the potential for insignificant effects interacting / combining to potentially form a significant interactive effect. For example, local residences experience residual air quality, daylight, sunlight, noise and vibration and socio-economics effects.

Recommendation: *remains unchanged. There is currently no assessment of interactive effects included in the ES, which was requested as part of LBC's EIA Scoping Opinion. An assessment of interactive effects should be included in the ES material.*

5.2 Further information

Table 1 in Section 1 of ES Volume 1 was titled *Effects of the Proposed Development grouped by receptor*. The table presents the summary of the residual likely environment effects of the Proposed Development and their significance on each receptor relevant to the EIA. The majority of receptors would experience either no significant effects or single, isolated effects. There were three receptors subject to multiple environmental effects, and the potential for interactive effects is considered further in this section.

5.2.1 British Library (existing facility)

The existing British Library facility was assessed in terms of effects on air quality (affecting library users) and the heritage fabric and setting of the library building.

During construction and operation, traffic associated with the Proposed Development has been assessed as having a negligible (not significant) impact on air quality at the British Library. Due to the temporal separation of construction and operational effects, these issues would not interact to give rise to an elevated effect. Air quality effects would also not interact with effects related to other environmental aspects to give rise to interactive effects.

The works to construct the connection from the existing listed British Library to the Proposed Development would result in a minor adverse, direct, permanent and non-significant effect on the listed building. The relocation of sensitive localised fabric would result in a negligible to minor adverse, permanent, direct and

non-significant effect on the listed building. These two effects would not interact to generate an effect of greater significance. They would also not interact with effects related to other environmental aspects to give rise to interactive effects.

No significant effects are anticipated in relation to any other environmental aspect, either in isolation or through interaction with other environmental aspects.

5.2.2 Residential receptors surrounding the Site

Residential receptors surrounding the Site were assessed in terms of effects on air quality, daylight, sunlight, overshadowing, solar glare and obtrusive lighting, noise and vibration and socio-economics.

During construction and operation, traffic associated with the Proposed Development has been assessed as having a negligible (not significant) impact on air quality at the assessed residential receptors. Due to the temporal separation of construction and operational effects, these issues would not interact to give rise to an elevated effect. Air quality effects would also not interact with effects related to other environmental aspects to give rise to interactive effects.

The completed Proposed Development would result in significant adverse effects on daylight levels in some units within Hadstock House and Levita House on Ossulston Street. Daylight effects would not interact with effects related to other environmental aspects to give rise to interactive effects.

Effects in terms of sunlight, overshadowing, solar glare and obtrusive lighting would not interact with effects related to other environmental aspects to give rise to interactive effects.

Construction activities would result in a significant noise effect on residential receptors on Ossulston Street. Vibration effects would not be significant. Noise and vibration would not interact to give rise to an elevated effect. In addition, they would also not interact with effects related to other environmental aspects to give rise to interactive effects.

Wider socio-economic effects arising from the use of the Proposed Development for residents within St Pancras and Somers Town ward, London Borough Camden and London, and institutions and companies within London's Knowledge Quarter are considered to be not significant. Socio-economic effects would not interact with effects related to other environmental aspects to give rise to interactive effects.

No significant effects are anticipated in relation to any other environmental aspect, either in isolation or through interaction with other environmental aspects.

5.2.3 Commercial properties close to the Site, including the Francis Crick Institute (FCI)

Commercial properties close to the Site were assessed in terms of effects on noise and vibration.

Construction activities would result in a significant noise effect on the St Pancras Hotel. Vibration effects would not be significant at that location or elsewhere. Noise and vibration would not interact to give rise to an elevated effect. In addition, they would also not interact with effects related to other environmental aspects to give rise to interactive effects.

No significant effects are anticipated in relation to any other environmental aspect, either in isolation or through interaction with other environmental aspects.

6. Descriptions of environmental effects

6.1 Summary of review

The Buro Happold initial report provided the following review comment with respect to the descriptions of environmental effects set out in the air quality, archaeology, climate change, electronic interference, environmental wind, noise and vibration and socio-economics assessments presented in the ES:

As requested in LBC's EIA Scoping Opinion, the effects predicted in this assessment should be classified as direct, indirect, short-term, medium-term, long term, permanent or temporary. This is a requirement of Schedule 4 of the EIA Regulations and the IEMA review criteria. It is recommended that all effects predicted in the ES, where not currently specified, be classified as per this requirement in an ES Addendum. Note this also includes the cumulative effects predicted, in addition to the effects of the proposed development in isolation. The applicant should, whilst preparing this, provide a definition of the assumed timescales regarding short, medium and long term within the ES Addendum for the effects predicted.

Arup's response stated:

Schedule 4 of the EIA Regulations requires that likely significant effects are identified, including those that are direct, indirect, short-term, medium-term, long term, permanent or temporary. It does not require that these descriptors are used to describe the effects that are identified. The ES has identified all significant effects falling within these descriptions.

Specifically in relation to the air quality assessment, this concluded that there would not be any significant adverse effects as a result of the Proposed Development.

Therefore, there are no significant effects to categorise using these descriptors.

The Buro Happold subsequent report provided a further response, including a recommendation on information that should be included in an ES Addendum:

It is Buro Happold's view that this position is potentially not defensible for the following reasons:

- 1. Whilst the consultant has identified effects that in theory are direct, indirect, short-term, medium-term, long term, permanent or temporary, making a case that the ES does not need to clarify / describe where they sit within this list is potentially challengeable. The Regulations state "The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development."*
- 2. There could be a challenge of non-compliance with the EIA scoping opinion (which was itself adhering to good practice guidance from IEMA).*

Recommendation: *this requirement was made clear in LBC's EIA Scoping Opinion. The recommendation remains unchanged.*

6.2 Further information

6.2.1 Air quality

The ES reports no significant effects on air quality, either in terms of residual effects or prior to consideration of additional mitigation. Therefore, there are no significant effects to report as direct, indirect, secondary, cumulative, transboundary, short-term, medium-term, long-term, permanent, temporary, positive or negative from the construction, existence or operation of the Proposed Development.

6.2.2 Archaeology

The ES reports no significant residual effects on archaeology. However, prior to additional mitigation, two significant effects were identified. These were in relation to the archaeological remains from the late 18th and early 19th century Somers Town housing development, and 19th century Somers Town Goods Yard. Both would experience a moderate adverse effect which would be significant without additional mitigation.

These significant adverse archaeology effects, prior to additional mitigation, would be direct, long-term, permanent negative effects.

6.2.3 Climate change

The ES reported there would be significant residual effects relating to climate change as a result of construction, existence and operation of the Proposed Development. This is specifically in relation to the emission of greenhouse gases.

These significant adverse effects would be direct and indirect, long-term and negative.

6.2.4 Electronic interference

The ES reports no significant residual effects in relation to electronic interference. However, prior to additional mitigation, the physical massing of the Proposed Development would cause obstruction to the transmission path of an emergency services point-to-point link.

The significant adverse electronic interference effect, prior to additional mitigation, would be direct, long-term, permanent and negative.

6.2.5 Environmental wind

The ES reports no significant effects on environmental wind, either in terms of residual effects or prior to consideration of additional mitigation. Therefore, there are no significant effects to report as direct, indirect, secondary, cumulative, transboundary, short-term, medium-term, long-term, permanent, temporary, positive or negative from the construction, existence or operation of the Proposed Development.

6.2.6 Noise and vibration

The ES reported that there would be significant residual construction noise effects on residential receptors on Ossulston Street and on St Pancras Hotel as a result of the Proposed Development. For clarity, no other significant noise or vibration effects were identified, either in terms of residual effects or prior to consideration of additional mitigation.

These significant adverse construction noise effects would be direct, short-term, temporary and negative.

6.2.7 Socio-economics

The ES reported a significant residual beneficial effect on direct employment as a result of lab-led occupation of the Proposed Development. For clarity, no other significant socio-economic effects were identified, either in terms of residual effects or prior to consideration of additional mitigation.

The significant employment effect would be direct, short-, medium- and long-term, permanent and positive.

7. Socio-economics – employment density scenarios

7.1 Summary of review

The Buro Happold initial report provided the following review comment with respect to the employment density applied in the socio-economics assessment presented in the ES:

Paragraph 13.7.2 refers to the “medium density scenarios” being used in the assessment. The applicant should confirm that this adequately allows for the range of effects to be assessed i.e., would a higher density or lower density scenario change the effects predicted? If the effects could differ, the range should be reported.

Arup’s response stated:

Appendix D4, paragraph D4.8.14 of ES Volume 3 confirms the use of the medium density for the socio-economic assessment: “For the purposes of the socio-economic assessment, the medium density scenario has been taken forward, as through professional judgement, and experience, the medium density is the most likely scenario, which suggests Scenarios 1 and 2 could sustain approximately 5,700 or 3,110 jobs (on-site direct employment) respectively”. This is considered to be the correct approach in light of the requirement of the EIA Regulations to identify the “likely significant effects” of the Proposed Development.

The Buro Happold subsequent report provided a further response, including a recommendation on information that should be included in an ES Addendum:

This approach potentially does not account for the range of effects that could occur for the proposed development that is being applied for. This is particularly relevant given that a significant effect has been predicted. The consultant should confirm whether the effects could be different if the range / other scenarios were to materialise. This should be clarified in an ES Addendum i.e., whether the minor beneficial and moderate (significant) beneficial effects predicted could change depending on density.

Recommendation: *this should be assessed and reported in an ES Addendum as per the original comment.*

7.2 Further information

7.2.1 Employment at different densities

Table 3, below, sets out the on-site direct employment for conservative, medium and high density scenarios, under both the office-led occupation (Scenario 1) and lab-led occupation (Scenario 2) at the London scale.

Table 3: Gross full-time equivalent (FTE) jobs at the London scale for different employment densities

Scenario	Scenario 1: office-led occupation	Scenario 2: lab-led occupation
Conservative	4,750	2,040
Medium*	5,730	3,140
High	6,940	5,500

*The medium density was assessed in the ES.

The figures in Table 3 are the same as presented in Tables 30-35 in Appendix D4.8 of the ES, with 30 new jobs generated by the British Library included.

7.2.2 Effects for medium density (as per ES)

Applying medium density occupation for the Proposed Development, approximately 3,140 (Scenario 2) to 5,730 (Scenario 1) jobs would be sustained (on-site, direct employment). This equates to approximately 3,179 (Scenario 2) to 5,802 (Scenario 1) net additional FTE jobs at the London scale, of which 1,060

(Scenario 2) to 1,934 (Scenario 1) are indirect and induced jobs. It is estimated that 2,296 (Scenario 2) to 4,190 (Scenario 1) net additional FTE jobs would be supported at the LBC scale, of which 530 to 967 are indirect and induced jobs.

The sensitivity of residents living in St Pancras and Somers Town ward, LBC and London has been identified as medium. With regards to Scenario 1 (office-led occupation), the impact of the uplift in FTE jobs within this sector is considered to be small within the context of this central London location, using the professional judgement and experience of similar assessments conducted by the project team. Scenario 1 would therefore produce a direct, permanent, minor beneficial effect which is not significant in EIA terms.

Despite the fact that Scenario 2 would generate a lower number of FTE jobs, because science and Research and Development (R&D) spaces require a bigger footprint, these end uses have potential to generate significant value to knowledge creation and innovation in the context of London's Knowledge Quarter, and as such would be expected to result in jobs with a higher GVA per job. Scenario 2 would result in a direct, short-, medium- and long-term, permanent, positive effect of moderate magnitude that is significant.

7.2.3 Effects for conservative density

Applying conservative density occupation for the Proposed Development, approximately 2,040 (Scenario 2) to 4,750 (Scenario 1) jobs would be sustained (on-site, direct employment). This equates to approximately 2,066 (Scenario 2) to 4,809 (Scenario 1) net additional FTE jobs at the London scale, of which 689 (Scenario 2) to 1,603 (Scenario 1) are indirect and induced jobs. It is estimated that 1,492 (Scenario 2) to 3,473 (Scenario 1) net additional FTE jobs would be supported at the LBC scale, of which 344 to 802 are indirect and induced jobs.

As with the medium density scenario outlined above, it is considered that the impact of the uplift in FTE jobs within the office sector is considered to be small within the context of this central London location, and Scenario 1 would therefore produce a direct, permanent, minor beneficial effect which is not significant in EIA terms.

Despite the lower number of FTE jobs associated with Scenario 2, because science and R&D spaces require a bigger footprint, these end uses have potential to generate significant value to knowledge creation and innovation in the context of London's Knowledge Quarter, and as such would be expected to result in jobs with a higher GVA per job. Scenario 2 with conservative density is considered to result in a direct, short-, medium- and long-term, permanent, positive effect of moderate magnitude that is significant.

7.2.4 Effects for high density

Applying high density occupation for the Proposed Development, approximately 5,500 (Scenario 2) to 6,940 (Scenario 1) jobs would be sustained (on-site, direct employment). This equates to approximately 5,569 (Scenario 2) to 7,027 (Scenario 1) net additional FTE jobs at the London scale, of which 1,856 (Scenario 2) to 2,342 (Scenario 1) are indirect and induced jobs. It is estimated that 4,022 (Scenario 2) to 5,073 (Scenario 1) net additional FTE jobs would be supported at the LBC scale, of which 928 to 1,171 are indirect and induced jobs.

As with the medium density scenario outlined above, it is considered that the impact of the uplift in FTE jobs within the office sector is small within the context of this central London location, despite the higher number of jobs associated with this density. Scenario 1 would therefore produce a direct, permanent, minor beneficial effect which is not significant in EIA terms.

In relation to Scenario 2, because science and R&D spaces require a bigger footprint, these end uses have potential to generate significant value to knowledge creation and innovation in the context of London's Knowledge Quarter, and as such would be expected to result in jobs with a higher GVA per job. Scenario 2 with high density is considered to result in a direct, short-, medium- and long-term, permanent, positive effect of moderate magnitude that is significant.

7.2.5 Conclusion

The assessed effects from conservative and high density described above are unchanged from the effects reported for medium density occupation in the ES. Regardless of employment density figures applied, the effect for Scenario 1 (office-led occupation) is not significant. Also, regardless of employment density

figures applied, the effect for Scenario 2 (lab-led occupation) is direct, short-, medium- and long-term, permanent, positive, of moderate magnitude, and significant.

8. Socio-economics cumulative effects

8.1 Summary of review

The Buro Happold initial report provided the following review comment with respect to the assessment of cumulative socio-economics effects presented in the ES:

Whilst commentary is provided in Table 37 on the potential for the different cumulative schemes to interact with the proposed development, there is no overall assessment of what the cumulative effects are. This should be assessed and confirmed. The updated assessment should also confirm whether the cumulative effects are direct, indirect, short-term, medium-term, long term, permanent or temporary.

Arup's response stated:

Table 37 of ES Volume 1 confirms the cumulation with other developments would not give rise to any elevated or changed effects compared to the assessment of the Proposed Development in isolation (as reported in Section 13.7).

The Buro Happold subsequent report provided a further response, including a recommendation on information that should be included in an ES Addendum:

This section is not clear. The second column highlights the potential for significant effects; however, the third column does not directly comment on whether significant effects would occur or not – it leads the reader open to inferring. There is no commentary on the cumulative effects of all development combined, which should be the focus of the assessment relating to cumulative effects in this section.

Recommendation: *this should be assessed and reported in an ES Addendum as per the original comment.*

8.2 Further information

Table 37 of the ES presented the assessment of potential cumulative effects alongside other developments. Arup confirms that no significant cumulative effects are anticipated to arise either in a singular context between the Proposed Development and each committed development, nor in a collective context between the Proposed Development and all committed developments combined

A.1 Buro Happold subsequent report

Review of ES Consultant responses dated 28th June 2022 - Extension to the British Library ES Review

Project Extension to the British Library ES Review
Subject Review of Arup Responses
Project no 0047829
Date 20 July 2022

Revision	Description	Issued by	Date	Approved
01	Review of Arup responses	Mark Crowther	20.07.22	Helen Lund

1 Introduction

Buro Happold has reviewed the ES consultant's responses (Arup, June 2022) to the ES Review report (Buro Happold, May 2022). In doing so, we have provided subsequent comments in this document. The original comments are either indicated as closed or open (with the original recommendation remaining intact, and further reasoning where relevant). Please note it is our view that it should be relatively straightforward to close out these remaining actions, via the preparation and submission of a brief ES Addendum.

ID	Buro Happold Report Ref	ES Chapter	Buro Happold comment (May 2022) (in summary)	Applicant's response (June 2022)	Buro Happold's further response
1	Section 4.2	Chapter 1: Introduction	Table 1 does not summarise cumulative effects. Given that the table is titled "effects of the proposed development", there is an argument to be made that this should include all effects as a result of the proposed development in isolation (including interactive effects on the same receptor) and also cumulatively alongside other proposed developments. Given there is no dedicated cumulative effects ES Chapter or conclusions chapter, and this table does not currently summarise all significant effects, it is our recommendation that an overall summary be provided that summarises all significant effects in an ES Addendum.	Table 1 lists only those effects considered to be significant. The topic assessments reported in ES Volumes 1 and 2 conclude there would not be any significant cumulative effects. Therefore, there are no likely significant cumulative effects to report in Table 1.	<p>This does not appear to be entirely correct. Table 1 is titled "effects of the proposed development grouped by receptor". There is commentary on insignificant and significant effects.</p> <p>We understand the point in regard to no significant cumulative effects being predicted, however note the following:</p> <ul style="list-style-type: none"> • There is currently no assessment of interactive effects in the ES • There is currently no definitive conclusion on cumulative effects for socio-economics – presumably there are no significant cumulative effects, however is this possible when the effects in isolation are significant? • It is not correct to say there are no significant cumulative effects. The greenhouse gas emissions assessment is inherently cumulative, as the ES states, and the effect would be significant. That effect is captured already. <p>Recommendation: discussion to be had with Arup to agree a way forward. The above points should be clarified before giving a final recommendation.</p>
2	Section 5.2	Chapter 2: Site and surroundings	The applicant should confirm the mitigation commitments made in the EIA Scoping Report, which included justification for scoping out various	The drawings of the Proposed Development submitted for approval and the draft Construction Management Plan (CMP) submitted with the planning application include	<p>Noted.</p> <p>Comment closed.</p>

			technical topics – will also be applied to the extended red line area where applicable.	all of the relevant mitigation commitments and design assumptions upon which the scope of the EIA was determined. These will extend to the entirety of the Proposed Development.	
3	Section 6.2	Chapter 3: Proposed Development	Given that the proposed development is larger (taller, more floor space and a larger red line) than that scoped for at the EIA Scoping Stage, it is assumed that the technical specialists contributing to the ES are satisfied with the EIA methodology as scoped. This should be clarified with the applicant.	The scope and methodology for the EIA remained under review throughout the process. The evolution of the design of the Proposed Development and the slightly enlarged extent of the application boundary were not considered to give rise to any changes in terms of the potential for significant effects. Therefore the scope and methodology set out in the scoping report were considered to remain appropriate.	Noted. Comment closed.
4	Section 6.2	Chapter 3: Proposed Development	It is Buro Happold’s view that the development description is currently falling short in satisfying requirements 1(c) and 1(d) of schedule 4 of the EIA Regulations. Specifically, energy demand, quantity of materials during construction and a description of the expected residues and emissions including “quantities and types of waste produced during the construction and operational phases” (there is currently no inclusion of waste generation included for the demolition, construction or operational phases in the ES) appear to be missing. It is our view that these elements should have been included in the description of the proposed development to satisfy the EIA Regulations. It is recommended that this information be provided in an ES Addendum.	Schedule 4, paragraph 1(c) requires “ <i>a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;</i> ”. The emphasis in this paragraph is that the main characteristics of the Proposed Development are described. The list of characteristics stated provides examples that may be relevant depending on the nature of the development. It is not prescriptive, as noted by the use of the phrase “ <i>for instance</i> ”. There is therefore no requirement in law to provide all of this information. It is considered that the description of the Proposed Development provided in the ES complies with the requirements of paragraph 1(c). The relevant information is provided in the ES to allow a robust assessment of the likely significant effects on the environment.	Given that they were included in the EIA scoping report as Arup have highlighted – which constitutes part of the EIA process and submission – this request is withdrawn. Comment closed.

				<p>Schedule 4, paragraph 1(d) requires “an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.” Residues and emissions have been fully considered in the EIA process as relevant to the nature of the Proposed Development. Taking the example noted, waste generation was estimated at the EIA scoping stage and scoped out on the basis that volumes would not be significant. Other emissions, such as greenhouse gas emissions and emissions of other air pollutants were fully assessed in the ES (Sections 8 and 5 of ES Volume 1 respectively).</p>	
5	Section 6.2	Chapter 3: Proposed Development	<p>The following information should also be provided in an ES Addendum:</p> <ul style="list-style-type: none"> a. Dates for the demolition of the BLCC and the fire escape structure; b. Dates for the excavation and construction of foundations and basement; c. Dates for implementing landscaping and public realm; <p>Confirmation of dates of occupation for the different parts of the development (i.e., will there be phased occupation?). Also note that further discussion will be required on the need for an intermediate year scenario if occupation of the proposed development is phased.</p>	<p>The construction programme information presented in the ES is considered sufficient to allow assessment of the likely significant effects on the environment. In addition to the information presented in the description of the Proposed Development (Section 3 of ES Volume 1), assumptions regarding other key dates or durations in the construction programme are made clear in the relevant assessments (e.g. the air quality and noise and vibration assessments). Phased occupation is not anticipated.</p>	<p>Regarding points a, b and c, this is not considered likely to be sufficient as these are fundamental components of the proposed development for which a programme has not been presented.</p> <p>There is no date given for site set up and demolition / it is not clear when construction works will commence from the description given (potentially 2023, working back from 2029 completion?).</p> <p>Recommendation: it is Buro Happold’s view that the ES should include reference to the aspects requested in points a, b and c which are all fundamental parts of the proposed development.</p> <p>Thank you for clarifying on point d. No further action is required on that aspect.</p>

6	Section 6.2	Chapter 3: Proposed Development	A comparison of the environmental effects of the alternatives considered by the applicant should be included in an ES Addendum to satisfy the EIA Regulations (2017) (as amended) – to include commentary on effect significance (i.e., whether significant effects would have occurred, when compared to the proposed development submitted for planning, if the alternatives had been implemented / is the difference significant or not).	The EIA Regulations, Schedule 4 (2) require “an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”. The EIA Regulations are not more specific and do not require commentary on the relative significance of effects of the alternatives considered. It is considered that Section 3.4 of ES Volume 1 satisfies the EIA Regulations by identifying changes made to the development to prevent and reduce potentially significant effects. For example, paragraph 3.4.17 identifies the moving of the Proposed Development to the east providing betterment, relative to earlier designs, for pedestrian access through level access from Midland Road and reduced vertical height difference with other buildings along Ossulston Street. It also identifies the moving of the Proposed Development east would provide improvements, relative to earlier design, for daylight and sunlight impacts for residencies on Ossulston Street. Another example is paragraph 3.4.20 which identifies that, following consultation with Camden Council, changes were made to the design roof, stair cores and stair enclosure, and pulling back the plant enclosure at roof level, so as to reduce impacts on views relative to earlier designs.	It is agreed that the wording of the regulations is open to interpretation. However, the focus of the EIA regulations is on whether effects are significant or not. Hence recommending that commentary on significance could/should have been provided, in addition to simply stating that improvements were made. It is noted that the section describes changes made to reduce potentially significant environmental effects, however the text at paragraph 3.4.1 states “where relevant, compares the respective environmental effects with the other options studied” – which is as per the wording of the regulations. Whilst it is stated that improvements were made in various places, this in itself does not directly compare the effect beyond the fact that it has been improved. Recommendation: remains unchanged i.e. our recommendation is that the consultant provides a comparison of the environmental effects, commenting on how the improvements made relate to significance (i.e. was a potentially significant effect avoided etc).
7	Section 7.2	Chapter 4: Approach to Assessment	There is currently no assessment of interactive effects provided in the ES, i.e., an assessment of the overall effect when there are several different effects to the same receptor. This was requested in the EIA Scoping Opinion and is a requirement of the IEMA Review Criteria and the EIA Regulations (2017). This assessment should be provided in an ES Addendum.	Table 1 in Section 1 of ES Volume 1 lists the conclusions of the EIA assessments by receptor. This allows a reader to understand where interactive effects may occur. As is clear from the table, there are no receptors that would experience concurrent significant adverse (or beneficial) effects. There are therefore no interactive effects to report.	Paragraph 1.2.1 states that Table 1 “allows the aggregation of these ‘interactive effects’ to be understood.” However, there is no commentary or assessment of whether an interactive effect occurs or not and whether this is significant. The consultant has confirmed adjacent that they are not anticipating any interactive effects to report, however for completeness we recommend

					<p>that this should be reported in the ES / an update to the ES.</p> <p>The consultant states that no receptors would experience concurrent significant effects, however there is no commentary on the potential for insignificant effects interacting / combining to potentially form a significant interactive effect. For example, local residences experience residual air quality, daylight, sunlight, noise and vibration and socio-economics effects.</p> <p>Recommendation: remains unchanged. There is currently no assessment of interactive effects included in the ES, which was requested as part of LBC's EIA Scoping Opinion. An assessment of interactive effects should be included in the ES material.</p>
8	Section 8.2	Chapter 5: Air quality	<p>Appendix D4 refers to traffic data being used from 2016. Clarification is required on the use of traffic data from 2016 and whether this is considered to be robust. Presumably it is, if traffic volumes are expected to decrease over time as the assessment suggests.</p> <p>However, the air quality consultant should confirm.</p>	<p>Appendix D4, paragraph D4.1.9 of ES Volume 3 confirms "Traffic data was obtained from the 2016 London Atmospheric Emissions Inventory (LAEI)" and "Traffic data from the LAEI are applicable for 2019 and 2025 due to expected limited traffic growth in the vicinity of the Site. This has been confirmed by the transport consultant." This data is considered to be robust for the purposes of the EIA.</p>	<p>Noted.</p> <p>Comment closed.</p>
9	Section 8.2	Chapter 5: Air quality	<p>Regarding Paragraph 5.4.14, bullet point 1, clarification is required on why 2019 has been used as the current baseline year, as opposed to 2022.</p>	<p>Appendix D4, paragraph D4.1.7 of ES Volume 3 confirms "2019 represents the baseline of the assessment year which has been used to undertake the model verification exercise, due to it being the latest year with full monitoring data at the point of the undertaking the assessment".</p> <p>In addition, Appendix D4, paragraph D4.1.12 of ES Volume 3 confirms 2019 is used as the baseline year for emissions factor: "This</p>	<p>Noted.</p> <p>Comment closed.</p>

				<p>approach is considered to be conservative, because no improvement in vehicle emission has been applied and therefore the uncertainty for future year vehicle emissions can be accounted for. It is expected that improvements would occur with continued uptake of new 'cleaner' vehicles and electric zero emission vehicles".</p>	
10	Section 8.2	Chapter 5: Air quality	<p>As requested in LBC's EIA Scoping Opinion, the effects predicted in this assessment should be classified as direct, indirect, short-term, medium-term, long term, permanent or temporary. This is a requirement of Schedule 4 of the EIA Regulations and the IEMA review criteria. It is recommended that all effects predicted in the ES, where not currently specified, be classified as per this requirement in an ES Addendum. Note this also includes the cumulative effects predicted, in addition to the effects of the proposed development in isolation. The applicant should, whilst preparing this, provide a definition of the assumed timescales regarding short, medium and long term within the ES Addendum for the effects predicted.</p>	<p>Schedule 4 of the EIA Regulations requires that likely significant effects are identified, including those that are direct, indirect, short-term, medium-term, long term, permanent or temporary. It does not require that these descriptors are used to describe the effects that are identified. The ES has identified all significant effects falling within these descriptions.</p> <p>Specifically in relation to the air quality assessment, this concluded that there would not be any significant adverse effects as a result of the Proposed Development.</p> <p>Therefore, there are no significant effects to categorise using these descriptors.</p>	<p>It is Buro Happold's view that this position is potentially not defensible for the following reasons:</p> <ol style="list-style-type: none"> 1. Whilst the consultant has identified effects that in theory are direct, indirect, short-term, medium-term, long term, permanent or temporary, making a case that the ES does not need to clarify / describe where they sit within this list is potentially challengeable. The Regulations state "<i>The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.</i>" 2. There could be a challenge of non-compliance with the EIA scoping opinion (which was itself adhering to good practice guidance from IEMA). <p>Recommendation: this requirement was made clear in LBC's EIA Scoping Opinion. The recommendation remains unchanged.</p>

11	Section 8.2	Chapter 5: Air quality	Reference is made to the good practice measures included in the Environmental Management Plan (EMP), submitted with the planning application, being assumed as implemented in this assessment. The EMP forms a separate document to the ES. The delivery of the EMP and the included measures should be secured as a planning obligation by LBC to ensure this mitigation occurs.	Noted. This would be best secured by a planning condition.	Agreed. Comment closed.
12	Section 9.2	Chapter 6: Archaeology	As requested in LBC's EIA Scoping Opinion, the effects predicted in this assessment should be classified as direct, indirect, short-term, medium-term, long term, permanent or temporary. This is a requirement of Schedule 4 of the EIA Regulations and the IEMA review criteria. It is recommended that all effects predicted in the ES, where not currently specified, be classified as per this requirement in an ES Addendum. Note this also includes the cumulative effects predicted, in addition to the effects of the proposed development in isolation. The applicant should, whilst preparing this, provide a definition of the assumed timescales regarding short, medium and long term within the ES Addendum for the effects predicted.	Schedule 4 of the EIA Regulations requires that likely significant effects are identified, including those that are direct, indirect, short-term, medium-term, long term, permanent or temporary. It does not require that these descriptors are used to describe the effects that are identified. The ES has identified all significant effects falling within these descriptions. Specifically in relation to the archaeology assessment, this concluded that there would not be any significant residual adverse effects as a result of the Proposed Development. Therefore, there are no significant residual effects to categorise using these descriptors. For clarification, prior to mitigation, adverse archaeology effects would be direct and permanent.	It is Buro Happold's view that this position is potentially not defensible for the following reasons: 1. Whilst the consultant has identified effects that in theory are direct, indirect, short-term, medium-term, long term, permanent or temporary, making a case that the ES does not need to clarify / describe where they sit within this list is potentially challengeable. The Regulations state " <i>The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.</i> " 2. There could be a challenge of non-compliance with the EIA scoping opinion (which was itself adhering to good practice guidance from IEMA).

					Recommendation: this requirement was made clear in LBC's EIA Scoping Opinion. The recommendation remains unchanged.
13	Section 9.2	Chapter 6: Archaeology	Reference is made to the good practice measures included in the Environmental Management Plan (EMP), submitted with the planning application, being assumed as implemented in this assessment. The EMP forms a separate document to the ES. The delivery of the EMP and the included measures should be secured as a planning obligation by LBC to ensure this mitigation occurs.	Noted. This would be best secured by a planning condition.	Agreed. Comment closed.
14	Section 9.2	Chapter 6: Archaeology	The additional committed mitigation specified in this assessment should be secured, by appropriate means, by LBC.	Noted. This would be best secured by a planning condition.	Agreed. Comment closed.
15	Section 11.2	Chapter 8: Climate change	Please clarify which embedded mitigation measures have been committed to, and which are aspirations which don't have clear commitments in place.	Section 8.6 of ES Volume 1 clearly sets out this information. Paragraph 8.6.4 presents the project commitments and paragraph 8.6.5 sets out opportunities that may be explored which go beyond the commitments. The section overall describes the framework through which both the commitments and opportunities will be taken forward. To reiterate the assessment methodology, only tangible commitments are considered when calculating greenhouse gas emissions in the assessment.	Noted. Comment closed.
16	Section 11.2	Chapter 8: Climate change	Although comments have been provided which may affect the GHG emissions assessment results, it is not considered that the conclusions on the significance of effects would change. It is recommended that clarifications are however formally submitted with an ES Addendum to the points raised in this	Dealing with the minor comments made: <ul style="list-style-type: none"> The baseline was established using metered energy consumption, and by its nature includes an element of 'repair and replacement'. However, this cannot be separated out. It is correct to note that switching from diesel to electric vans has not been 	Noted. Comment closed.

			<p>review section, if one is prepared, for completeness.</p>	<p>considered in the assessment. However, as this features in both the baseline and assessment, the net effects of this is expected to be negligible.</p> <ul style="list-style-type: none"> The point made about the boundaries of borough-wide or city-wide GHG emissions data is noted. However, this would not affect the numbers presented and the associated conclusions. <p>As noted by the reviewer, updating the assessment to take account of the above would not change the conclusions regarding the significance of effects. On this basis, the conclusions of the assessment are considered to be robust in terms of supporting the determination of the planning application and an updated assessment is not required.</p>	
17	Section 11.2	Chapter 8: Climate change	<p>As requested in LBC's EIA Scoping Opinion, the effects predicted in this assessment should be classified as direct, indirect, short-term, medium-term, long term. This is a requirement of Schedule 4 of the EIA Regulations and included in the IEMA review criteria. It is recommended that all effects predicted in the ES, where not currently specified, be classified as per this requirement in an ES Addendum. Note this also includes the cumulative effects predicted, in addition to the effects of the proposed development in isolation. The applicant should, whilst preparing this, provide a definition of the assumed timescales regarding short, medium and long term within the ES Addendum for the effects predicted.</p>	<p>Schedule 4 of the EIA Regulations requires that likely significant effects are identified, including those that are direct, indirect, short-term, medium-term, long term, permanent or temporary. It does not require that these descriptors are used to describe the effects that are identified. The ES has identified all significant effects falling within these descriptions.</p> <p>For clarification, in relation to the greenhouse gas assessment, adverse effects would be both direct and indirect, and would be long term.</p>	<p>It is Buro Happold's view that this position is potentially not defensible for the following reasons:</p> <ol style="list-style-type: none"> Whilst the consultant has identified effects that in theory are direct, indirect, short-term, medium-term, long term, permanent or temporary, making a case that the ES does not need to clarify / describe where they sit within this list is potentially challengeable. The Regulations state "<i>The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.</i>"

					<p>2. There could be a challenge of non-compliance with the EIA scoping opinion (which was itself adhering to good practice guidance from IEMA).</p> <p>Recommendation: this requirement was made clear in LBC's EIA Scoping Opinion. The recommendation remains unchanged.</p>
18	Section 12.2	Chapter 9: Daylight, sunlight,	Paragraph 9.1.2 refers to this chapter being read in conjunction with the "Daylight and Sunlight Impact On Neighbouring Properties Report" submitted separately with the planning application. It is assumed, however, that this report does not constitute information put forward to satisfy the EIA Regulations. If it does, it should be included as part of the ES (as an Appendix in Volume 3). This should be confirmed with the applicant, as it arguably does not currently constitute part of the EIA submission.	The 'Daylight and Sunlight Impact On Neighbouring Properties Report' does not form part of the ES. The reference is included solely to highlight to an interested reader that this separate report has also been provided with the planning application. The ES assessment does not rely on any information included within that report.	<p>Noted.</p> <p>Comment closed.</p>
19	Section 12.2	Chapter 9: Daylight, sunlight, overshadowing, solar glare and obtrusive light	Paragraph 9.7.3 confirms that internal layouts have not been obtained for Chamberlain House. The applicant should confirm that a reasonable worst case assumption was therefore made when undertaking the assessment.	Paragraph D4.5.87 of ES Volume 3 confirms that where building layouts could not be obtained, an assumption, based on common practice where access to a building for surveying is unavailable, has been made for the internal configuration for the rooms. This is considered to be a reasonably conservative approach and appropriate to identify the likely significant effects.	<p>Noted.</p> <p>Comment closed.</p>
20	Section 12.2	Chapter 9: Daylight, sunlight, overshadowing, solar glare and obtrusive light	Paragraph 9.7.11 confirms that internal layouts have not been obtained for Hadstock House. The applicant should confirm that a reasonable worst case assumption was therefore made when undertaking the assessment.	See response to item 19 above.	<p>Noted.</p> <p>Comment closed.</p>

21	Section 12.2	Chapter 9: Daylight, sunlight, overshadowing, solar glare and obtrusive light	Paragraph 9.7.22 confirms that internal layouts have not been obtained for Levita House. The applicant should confirm that a reasonable worst case assumption was therefore made when undertaking the assessment.	See response to item 19 above.	Noted. Comment closed.
22	Section 12.2	Chapter 9: Daylight, sunlight, overshadowing, solar glare and obtrusive light	Paragraph 9.4.9 states that “only amenity areas outside of the Site boundary are assessed, as matters within the Site are considered a design issue”. It is recommended that the potential for significant effects to introduced amenity areas should be disclosed / summarised in the ES. This is because such areas arguably form a future receptor introduced by the proposed development itself. This can be included in any future ES Addendum.	It is considered that overshadowing assessments of proposed amenity areas within a development are not considered an EIA issue. This is because there is no baseline level of shadow against which to compare. In accordance with the methodology set out in the BRE Guidelines, it is therefore not possible to ascribe the significance of effect.	Noted. Comment closed.
23	Section 13.2	Chapter 10: Electronic interference	As requested in LBC’s EIA Scoping Opinion, the effects predicted in this assessment should be classified as direct, indirect, short-term, medium-term, long term, permanent or temporary. This is a requirement of Schedule 4 of the EIA Regulations and the IEMA review criteria. It is recommended that all effects predicted in the ES, where not currently specified, be classified as per this requirement in an ES Addendum. Note this also includes the cumulative effects predicted, in addition to the effects of the proposed development in isolation. The applicant should, whilst preparing this, provide a definition of the assumed timescales regarding short, medium and long term within the ES Addendum for the effects predicted.	Schedule 4 of the EIA Regulations requires that likely significant effects are identified, including those that are direct, indirect, short-term, medium-term, long term, permanent or temporary. It does not require that these descriptors are used to describe the effects that are identified. The ES has identified all significant effects falling within these descriptions. For clarification, in relation to this assessment, the identified adverse effect on the transmission path of the emergency services fixed point-to-point telecommunications link would be direct and permanent.	It is Buro Happold’s view that this position is potentially not defensible for the following reasons: 1. Whilst the consultant has identified effects that in theory are direct, indirect, short-term, medium-term, long term, permanent or temporary, making a case that the ES does not need to clarify / describe where they sit within this list is potentially challengeable. The Regulations state “ <i>The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.</i> ”

					<p>2. There could be a challenge of non-compliance with the EIA scoping opinion (which was itself adhering to good practice guidance from IEMA).</p> <p>Recommendation: this requirement was made clear in LBC's EIA Scoping Opinion. The recommendation remains unchanged.</p>
24	Section 13.2	Chapter 10: Electronic interference	The mitigation discussed in Section 10.7.2, 10.7.4 and 10.8 should be secured in the way of a planning condition/obligation, relating to both the construction phase and existence phase of the proposed development. Buro Happold recommends that this planning condition should include commitments in regard to consultation with relevant stakeholders, including Airwave, confirmation of their acceptance of any agreed measures, evidence of implementation of the measures and appropriate verification that the measures have worked.	Noted. This would be best secured by a planning condition.	<p>Agreed.</p> <p>Comment closed.</p>
25	Section 14.2	Chapter 11: Environmental wind	Paragraph 11.5.2 bullet 1 specifies that westerly winds are the most frequent and strongest winds. This should be clarified as the wind roses and paragraph 11.5.3 indicates south-westerly winds being the most frequent? Applicant to please confirm.	<p>Paragraph 11.5.3 relates to measured baseline wind tunnel test results rather than the wind roses (Figure 13, and described in paragraph 11.5.2 and subsequent bullets).</p> <p>The difference between these is accounted for by shelter and acceleration effects associated with neighbouring buildings.</p>	<p>Noted.</p> <p>Comment closed.</p>
26	Section 14.2	Chapter 11: Environmental wind	As requested in LBC's EIA Scoping Opinion, the effects predicted in this assessment should be classified as direct, indirect, short-term, medium-term, long term, permanent or temporary. This is a requirement of	Schedule 4 of the EIA Regulations requires that likely significant effects are identified, including those that are direct, indirect, short-term, medium-term, long term, permanent or temporary. It does not require that these descriptors are used to describe the effects	<p>It is Buro Happold's view that this position is potentially not defensible for the following reasons:</p> <ol style="list-style-type: none"> 1. Whilst the consultant has identified effects that in theory are direct, indirect, short-term, medium-term,

			<p>Schedule 4 of the EIA Regulations and the IEMA review criteria. It is recommended that all effects predicted in the ES, where not currently specified, be classified as per this requirement in an ES Addendum. Note this also includes the cumulative effects predicted, in addition to the effects of the proposed development in isolation. The applicant should, whilst preparing this, provide a definition of the assumed timescales regarding short, medium and long term within the ES Addendum for the effects predicted.</p>	<p>that are identified. The ES has identified all significant effects falling within these descriptions.</p> <p>Specifically in relation to the environmental wind assessment, this concluded there would not be any significant adverse effects as a result of the Proposed Development. Therefore, there are no significant effects to categorise using these descriptors.</p>	<p>long term, permanent or temporary, making a case that the ES does not need to clarify / describe where they sit within this list is potentially challengeable. The Regulations state <i>"The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development."</i></p> <p>2. There could be a challenge of non-compliance with the EIA scoping opinion (which was itself adhering to good practice guidance from IEMA).</p> <p>Recommendation: this requirement was made clear in LBC's EIA Scoping Opinion. The recommendation remains unchanged.</p>
27	Section 14.2	Chapter 11: Environmental wind	<p>Note paragraph 11.7.1 confirms that the wind assessment has been undertaken with the proposed landscaping (including soft landscaping) incorporated. As landscaping can occasionally change post planning submission, should the proposed landscaping change in the future in terms of location, type and extent of planting / physical structures then this should be reviewed by the wind consultant to confirm that the effects predicted in the ES do not change. It is recommended that this is secured by LBC in the way of a planning obligation.</p>	<p>Noted. This would be best secured by a planning condition.</p>	<p>Agreed.</p> <p>Comment closed.</p>

28	Section 15.2	Chapter 12: Noise and vibration	<p>Paragraph 12.10.1 and 12.10.3 identifies that Central Sommers Town could have a cumulative effect alongside the construction of the proposed development in regard to construction noise.</p> <p>However, there does not appear to be an assessment of cumulative construction noise from construction activities, beyond construction traffic. This section does suggest that a cumulative effect from construction activities, beyond traffic, could occur. The cumulative effect and the significance level should be confirmed in an ES Addendum.</p>	<p>The focus of the text was on construction traffic, as cumulative effects from construction activities are considered unlikely. This is due to the distance between the two development and screening effects, afforded by the Francis Crick Institute.</p>	<p>The text was not clear, but noted with the confirmation.</p> <p>Comment closed.</p>
29	Section 15.2	Chapter 12: Noise and vibration	<p>As requested in LBC's EIA Scoping Opinion, the effects predicted in this assessment should be classified as direct, indirect, short-term, medium-term, long term, permanent or temporary. This is a requirement of Schedule 4 of the EIA Regulations and the IEMA review criteria. It is recommended that all effects predicted in the ES, where not currently specified, be classified as per this requirement in an ES Addendum. Note this also includes the cumulative effects predicted, in addition to the effects of the proposed development in isolation. The applicant should, whilst preparing this, provide a definition of the assumed timescales regarding short, medium and long term within the ES Addendum for the effects predicted.</p>	<p>Schedule 4 of the EIA Regulations requires that likely significant effects are identified, including those that are direct, indirect, short-term, medium-term, long term, permanent or temporary. It does not require that these descriptors are used to describe the effects that are identified. The ES has identified all significant effects falling within these descriptions.</p> <p>For clarification, in relation to this assessment, the identified adverse construction noise effects would be direct and temporary.</p>	<p>It is Buro Happold's view that this position is potentially not defensible for the following reasons:</p> <ol style="list-style-type: none"> 1. Whilst the consultant has identified effects that in theory are direct, indirect, short-term, medium-term, long term, permanent or temporary, making a case that the ES does not need to clarify / describe where they sit within this list is potentially challengeable. The Regulations state "<i>The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.</i>" 2. There could be a challenge of non-compliance with the EIA scoping

					<p>opinion (which was itself adhering to good practice guidance from IEMA).</p> <p>Recommendation: this requirement was made clear in LBC’s EIA Scoping Opinion. The recommendation remains unchanged.</p>
30	Section 15.2	Chapter 12: Noise and vibration	<p>Whilst significant construction noise effects have been identified, the mitigation outlined is rather open / non-committal. For example, the wording says the “following additional mitigation measures may be considered”. The mitigation measures that will definitely be used should be confirmed ahead of the construction phase commencing. LBC should secure this mitigation in the way of a planning condition / obligation to ensure it is implemented.</p>	<p>The Applicant accepts that a planning condition will require the works to be conducted in accordance with a final agreed version of the draft CMP submitted with the planning application.</p>	<p>Noted.</p> <p>Comment closed.</p>
31	Section 16.2	Chapter 13: Socio-economics	<p>Paragraph 13.7.2 refers to the “medium density scenarios” being used in the assessment. The applicant should confirm that this adequately allows for the range of effects to be assessed i.e., would a higher density or lower density scenario change the effects predicted? If the effects could differ, the range should be reported.</p>	<p>Appendix D4, paragraph D4.8.14 of ES Volume 3 confirms the use of the medium density for the socio-economic assessment: “For the purposes of the socio- economic assessment, the medium density scenario has been taken forward, as through professional judgement, and experience, the medium density is the most likely scenario, which suggests Scenarios 1 and 2 could sustain approximately 5,700 or 3,110 jobs (on-site direct employment) respectively”. This is considered to be the correct approach in light of the requirement of the EIA Regulations to identify the “likely significant effects” of the Proposed Development.</p>	<p>This approach potentially does not account for the range of effects that could occur for the proposed development that is being applied for. This is particularly relevant given that a significant effect has been predicted. The consultant should confirm whether the effects could be different if the range / other scenarios were to materialise. This should be clarified in an ES Addendum i.e., whether the minor beneficial and moderate (significant) beneficial effects predicted could change depending on density.</p> <p>Recommendation: this should be assessed and reported in an ES Addendum as per the original comment.</p>

32	Section 16.2	Chapter 13: Socio-economics	<p>Whilst commentary is provided in Table 37 on the potential for the different cumulative schemes to interact with the proposed development, there is no overall assessment of what the cumulative effects are. This should be assessed and confirmed. The updated assessment should also confirm whether the cumulative effects are direct, indirect, short-term, medium-term, long term, permanent or temporary.</p>	<p>Table 37 of ES Volume 1 confirms the cumulation with other developments would not give rise to any elevated or changed effects compared to the assessment of the Proposed Development in isolation (as reported in Section 13.7).</p>	<p>This section is not clear. The second column highlights the potential for significant effects; however, the third column does not directly comment on whether significant effects would occur or not – it leads the reader open to inferring. There is no commentary on the cumulative effects of all development combined, which should be the focus of the assessment relating to cumulative effects in this section.</p> <p>Recommendation: this should be assessed and reported in an ES Addendum as per the original comment</p>
33	Section 16.2	Chapter 13: Socio-economics	<p>As requested in LBC’s EIA Scoping Opinion, all of the effects predicted in this assessment should be classified as direct, indirect, short-term, medium-term, long term, permanent or temporary. This is a requirement of Schedule 4 of the EIA Regulations and the IEMA review criteria. It is recommended that all effects predicted in the ES, where not currently specified, be classified as per this requirement in an ES Addendum. Note this also includes the cumulative effects predicted, in addition to the effects of the proposed development in isolation. The applicant should, whilst preparing this, provide a definition of the assumed timescales regarding short, medium and long term within the ES Addendum for the effects predicted.</p>	<p>Schedule 4 of the EIA Regulations requires that likely significant effects are identified, including those that are direct, indirect, short-term, medium-term, long term, permanent or temporary. It does not require that these descriptors are used to describe the effects that are identified. The ES has identified all significant effects falling within these descriptions.</p> <p>For clarification, in relation to this assessment, the identified beneficial effect related to employment generation for the lab-led scenario would be direct and permanent.</p>	<p>It is Buro Happold’s view that this position is potentially not defensible for the following reasons:</p> <ol style="list-style-type: none"> 1. Whilst the consultant has identified effects that in theory are direct, indirect, short-term, medium-term, long term, permanent or temporary, making a case that the ES does not need to clarify / describe where they sit within this list is potentially challengeable. The Regulations state <i>“The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.”</i> 2. There could be a challenge of non-compliance with the EIA scoping

					<p>opinion (which was itself adhering to good practice guidance from IEMA).</p> <p>Recommendation: this requirement was made clear in LBC’s EIA Scoping Opinion. The recommendation remains unchanged.</p>
34	Section 17.2	Volume II of the ES: Townscape, visual and built heritage (off-site) assessment	<p>The below statement is extracted from paragraph 4.8. Having read this section, whilst it appears to be saying that the potential sensitive views, where significant effects could occur, have been assessed – it is not currently as clear as it perhaps could have been. This should be confirmed by the applicant, i.e., that there are no other sensitive views that could be significantly affected beyond 150m from the site, that require assessment?</p> <p>The TZVI in Appendix C, which does not include trees, shows the potential for widespread visual impacts within approximately 500m of the Site. More detailed testing of views in the 3-d model (including the verified views included in the Visual Assessment and Appendix A and the unverified test views modelled in Appendix B) has demonstrated that there would be potential for significant townscape, visual and heritage impacts within a radius of approximately 150m of the British Library Extension Site. Outside this close area, while development on the Site could be visible, impacts would not generally be ‘significant’, although there are more distant areas of potential higher visibility as a result of</p>	<p>Significant visual effects outside the 150m study area have been assessed. The majority of the significant effects are within the 150m study area. Outside the 150m study area there are some potentially significant effects where the alignment of streets and spaces increases the potential visibility of the Proposed Development. Where there is the potential for significant effects outside the study area, relevant views have been included in the visual assessment.</p>	<p>Noted.</p> <p>Comment closed.</p>

			the particular alignment of streets and open spaces, for example along Pentonville Road, which vary in their potential for significant effects according to the sensitivity of the intervening townscape, and which generally reduce in scale with distance from the Site. This has informed the extent of the study area considered to be sufficient to understand the range of likely significant effects of the Proposed Development for each sub-topic. Each study area is considered to be reasonable and proportionate in relation to the anticipated effects of the Proposed Development and the sensitivity to change of its townscape, visual or built heritage context.		
35	Section 18.2	Non-technical summary	Updates made in response to comments on Volume 1 of the ES should be reflected in an Addendum to the NTS.	It is not considered necessary, for the reasons set out in this document, for any further environmental information to be provided in response to the comments raised by Buro Happold, and no addendum to the NTS is therefore required.	Recommendation: an update to the NTS should be provided alongside any ES Addendum.
36	Section 19.4	Review of cross cutting issues	As per the comments included in the preceding sections in this report, [the use of effect descriptors] has not been applied throughout the ES for all effects predicted and therefore there is an argument to be made that the ES does not comply with the requirements of the EIA Scoping Opinion, EIA Regulations and the IEMA EIA Review Criteria.	As noted above, Schedule 4 of the EIA Regulations requires that likely significant effects are identified, including those that are direct, indirect, short-term, medium-term, long term, permanent or temporary. It does not require that these descriptors are used to describe the effects that are identified. The ES has identified all significant effects falling within these descriptions. Furthermore, the nature of the significant effects is clear from the narrative provided within the ES, including whether the effects are direct or indirect, and their duration.	It is Buro Happold's view that this position is potentially not defensible for the following reasons: <ol style="list-style-type: none"> 1. Whilst the consultant has identified effects that in theory are direct, indirect, short-term, medium-term, long term, permanent or temporary, making a case that the ES does not need to clarify / describe where they sit within this list is potentially challengeable. The Regulations state "<i>The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any</i>

					<p><i>indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development."</i></p> <p>2. There could be a challenge of non-compliance with the EIA scoping opinion (which was itself adhering to good practice guidance from IEMA).</p> <p>Recommendation: this requirement was made clear in LBC's EIA Scoping Opinion. The recommendation remains unchanged.</p>
37	Section 19.4	Review of cross cutting issues	In summary, the ES does not comply with the following aspects of the IEMA ES Review Criteria:	It is noted that the IEMA ES Review Criteria are not designed as a tool to assist planning authorities in determining the compliance of an ES with the EIA Regulations. It would therefore be inappropriate to use these as the basis for advice to a planning authority on the fitness of an ES to support a planning determination.	The use of the IEMA ES Review Criteria is both standard practice and routinely used in such ES reviews because it forms good practice guidance.
			COM3 A) The ES does not fully describe the timescales for demolition and construction.	See response to item 5 above.	See Buro Happold response above
			COM3 E) There is no assessment of interaction effects, i.e., an assessment of the overall effect when there are several different effects to the same receptor.	See response to item 7 above.	See Buro Happold response above
			COM3 F) Not all effects in the ES are summarised as direct, indirect, secondary, short, medium, long-term, permanent and temporary. See the comments on the technical chapters.	See response to item 36 above.	See Buro Happold response above
			COM4 A) The ES does not fully comply with the EIA Scoping Opinion.	See response to item 36 above.	See Buro Happold response above

	COM4 B III) The ES does not provide a measurable / commentary on significance / comparison of the environmental effects for the design alternatives considered.	See response to item 6 above.	See Buro Happold response above
	COM4 B iv) The ES does not explicitly outline any issues raised by consultees not dealt with in the ES.	The ES addresses issues raised by consultees where relevant to the EIA process. Other matters related to consultation are described in the Statement of Community Involvement prepared by LCA and the Town Planning Statement prepared by Gerald Eve LLP, both submitted with the planning application.	Noted. It is our view that this does not constitute a Regulation 25 Request Comment closed.
	COM5 B vi) There is no assessment of interaction effects, i.e., an assessment of the overall effect when there are several different effects to the same receptor.	See response to item 7 above.	See Buro Happold response above
	COM5 C iii) The ES does not consistently set out how mitigation measures are to be secured and implemented and with whom the responsibility for their delivery lies. This should be addressed in an ES Addendum.	It is anticipated that all mitigation will be secured by planning condition/obligation as appropriate.	The ES does not set out how mitigation measures are to be secured, implemented and where the responsibility lies. Reviewing the Regulations as opposed to the IEMA review criteria, we are happy to retract this request. It is our view that this does not in itself constitute a Regulation 25 Request. If this information was to be provided, it would be voluntary. Comment closed.
	COM6 iii) The anticipated timescales of demolition and construction are not set out fully as per the comments raised on Chapter 3 Proposed Development.	See response to item 5 above.	See Buro Happold response above

