

The British Library Extension

**Independent Review of Environmental Statement Addendum dated
September 2022**

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date **16.09.22**

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1 Introduction

1.1 Buro Happold's role

Buro Happold has been appointed, by the London Borough of Camden (LBC), to provide independent Environmental Impact Assessment (EIA) advice for the British Library Extension.

Buro Happold's commission, for this project, includes input to the following stages of the EIA process:

1. Scoping Stage – independent review of EIA scoping report;
2. Pre-application Stage – on-going advice to LBC on EIA matters; and
3. Application Stage – independent review of Environmental Statement (ES).

This report is a continuation of item 3, the application stage, and summarises Buro Happold's independent review of the ES Addendum (dated September 2022), which provides an update to the original Arup ES (dated January 2022). This current report should be read alongside Buro Happold's original ES review report dated May 2022.

1.2 The project / application context

The works involve extending the northern aspect of the existing British Library to provide library accommodation, commercial and lab-enabled office space, retail space; and the Crossrail 2 works at basement level, totalling to a gross internal area (GIA) of 100,358m², of which:

- 77,046m² (GIA) would be commercial space (Class E); this would comprise office space, including commercial amenity, designed to cater for knowledge quarter uses (including life sciences, cultural, scientific and heritage collections and data sciences);
- 15,015m² (GIA) for British Library uses, including foyer, public circulation, new library accommodation including the replaced BLCC and British Library Sound Archive, and the Alan Turing Institute;
- 558m² (GIA) for retail; and
- 7,739m² (GIA) would be sui generis use related to basement level infrastructure for Crossrail 2.

The proposal for the site (hereafter referred to as the 'proposed development'), for which planning permission is sought, as stated within the Planning Statement, comprises:

Full planning permission is sought for the following: *"Alterations to existing British Library building including demolition of the existing British Library Centre for Conservation and construction of a new building of up to 12 above-ground storeys and one basement level for use as library, galleries, learning, business and events spaces (Class F1) and retail and commercial spaces (Class E); provision of internal and external public spaces, landscaping and a community garden; improvement works adjacent to Dangoor Walk; provision of cycle and car parking and servicing facilities; provision of Crossrail 2 infrastructure; means of access; and all associated works and infrastructure."*

1.3 The Environmental Statement Team

The January 2022 ES, and September 2022 ES Addendum subject to this independent review, have been prepared with input from the following consultants:

- EIA Coordination – Arup;
- Air quality – Arup;
- Archaeology – Arup;
- Built heritage (on-site) – Cordula Zeidler Heritage;
- Climate change – Arup;
- Daylight, sunlight, overshadowing, solar glare and obstructive light – GIA;
- Electronic interference – Arup;
- Environmental wind – Arup;
- Noise and vibration – Arup;
- Socio-economics – Arup;
- Townscape, visual and built heritage (off-site) – Tavernor Consultancy;
- Planning Consultant – Gerald Eve.

1.4 Context regarding the ES Addendum

A number of recommendations were previously made by Buro Happold (in the May 2022 ES Review Report) to satisfy the EIA Regulations (2017), on review of the January 2022 Arup ES. Subsequent to the issue of the report, and further discussions, an ES addendum has been submitted to address a number of remaining recommendations.

2 Review team and responsibilities

Buro Happold has provided a generalist review of the entire ES with regard to ES process. Specifically, for the September 2022 ES addendum, the review team responsibility is set out in Table 2-1.

Table 2-1 ES review team and responsibilities

Company	Individual	Qualifications and position	Responsibility for reviewing
Buro Happold EIA / Environmental Assessment & Management Team	Mark Crowther	BSc (Hons), MSc, CEnv, MIEMA. Director and Head of EIA at Buro Happold	The entirety of the ES Addendum from a generalist perspective. This has included a specific focus on the close out of the previously recommended Regulation 25 Requests included in Buro Happold's ES Review Report dated May 2022.

3 Review of ES Addendum against previous recommendations

Subsequent to the Buro Happold ES Review of May 2022, there has been further discussion and correspondence with Arup on behalf of the applicant as summarised in Table 3-1. This dialogue has led to a number of Buro Happold's previous recommendations being closed out. The ES Addendum now submitted, providing further environmental information to satisfy the EIA Regulations (2017) (as amended), has been reviewed and we have provided commentary in the final column of Table 3-1. In summary, all of Buro Happold's recommendations are considered to be closed and dealt with.

Table 3-1 Review and close out of previous recommendations included in ES Review Report dated May 2022

ID	Buro Happold Report Ref	ES Chapter	Buro Happold comment (May 2022) (in summary)	Applicant's response (June 2022)	Buro Happold's further response (July 2022)	Buro Happold review of ES Addendum dated September 2022
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	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 	<p>Interactive effects are now assessed and concluded upon within Chapter 5 of the ES Addendum.</p> <p>Chapter 8 of the ES Addendum concludes that there are no significant cumulative effects in relation to socio-economics predicted.</p> <p>Comments closed.</p>

			significant effects in an ES Addendum.		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	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 technical topics – will also be applied to the extended red line area where applicable.	The drawings of the Proposed Development submitted for approval and the draft Construction Management Plan (CMP) submitted with the planning application include 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.	Noted. Comment closed.	N/A
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	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	Noted. Comment closed.	N/A

			scoped. This should be clarified with the applicant.	for significant effects. Therefore the scope and methodology set out in the scoping report were considered to remain appropriate.		
4	Section 6.2	Chapter 3: Proposed Development	<p>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,</p> <p>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.</p>	<p>Schedule 4, paragraph 1(c) requires “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;”. 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 “for instance”. There is therefore no requirement in law to provide all of this information. It is considered that the description of the</p>	<p>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.</p> <p>Comment closed.</p>	N/A

				<p>Proposed Development provided in the ES complies with the requirements of</p> <p>paragraph 1(c). The relevant information is provided in the ES to allow a robust assessment of the likely significant effects on the environment.</p> <p>Schedule 4, paragraph 1(d) requires <i>“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.”</i> Residues and emissions have been fully considered in the EIA process as relevant to the nature of the Proposed</p> <p>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.</p> <p>Other emissions, such as greenhouse gas emissions and emissions of other air pollutants were fully assessed in the ES</p>		
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				(Sections 8 and 5 of ES Volume 1 respectively).		
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).</p> <p>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>	<p>This information is provided in Table 1 of Chapter 3 of the ES Addendum.</p> <p>Comment closed.</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	The EIA Regulations, Schedule 4 (2) require "an indication of the main reasons for selecting the chosen option, including a	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.	<p>This information is provided in Table 2 of Chapter 4 of the ES Addendum.</p> <p>Comment closed.</p>

			<p>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).</p>	<p>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.</p> <p>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</p>	<p>Hence recommending that commentary on significance could/should have been provided, in addition to simply stating that improvements were made.</p> <p>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.</p> <p>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.</p> <p>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).</p>	
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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.	<p>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.</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</p>	<p>This information is provided in Chapter 5 of the ES Addendum.</p> <p>Comment closed.</p>

					effects should be included in the ES material.	
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>	N/A
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:</p>	<p>Noted.</p> <p>Comment closed.</p>	N/A

				<p>“This 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</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>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,</i> 	<p>Addressed within Section 6.2.1.</p> <p>Comment closed.</p>

			within the ES Addendum for the effects predicted.	Therefore, there are no significant effects to categorise using these descriptors.	<ul style="list-style-type: none"> <i>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>	
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.	N/A

12	Section 9.2	Chapter 6: Archaeology	<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 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.</p> <p>For clarification, prior to mitigation, adverse archaeology effects 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> <ul 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> <ol style="list-style-type: none"> 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>	<p>Addressed within Section 6.2.2.</p> <p>Comment closed.</p>
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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.	N/A
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.	N/A
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	Noted. Comment closed.	N/A

				considered when calculating greenhouse gas emissions in the assessment.		
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 review section, if one is prepared, for completeness.	<p>Dealing with the minor comments made:</p> <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 considered in the assessment. However, as this features in both the baseline and assessment, the net effects of this is expected to be negligible. 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. 	Noted. Comment closed.	N/A

				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.		
17	Section 11.2	Chapter 8: Climate change	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	<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"> 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,</i> 	<p>Addressed within Section 6.2.3.</p> <p>Comment closed.</p>

			within the ES Addendum for the effects predicted.		<ul style="list-style-type: none"> <i>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,	<p>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</p>	<p>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.</p> <p>The ES assessment does not rely on any information included within that report.</p>	<p>Noted.</p> <p>Comment closed.</p>	N/A

			currently constitute part of the EIA submission.			
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.	Noted. Comment closed.	N/A
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.	Noted. Comment closed.	N/A
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.	N/A

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.	N/A
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	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	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,</i>	Addressed within Section 6.2.4. Comment closed.

			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.	telecommunications link would be direct and permanent.	<p><i>secondary, cumulative, transboundary, short-term,</i></p> <ul style="list-style-type: none"> <i>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	Noted. This would be best secured by a planning condition.	Agreed. Comment closed.	N/A

			of any agreed measures, evidence of implementation of the measures and appropriate verification that the measures have worked.			
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.	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). The difference between these is accounted for by shelter and acceleration effects associated with neighbouring buildings.	Noted. Comment closed.	N/A
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 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	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 environmental wind assessment, this concluded there would not be	It is Buro Happold's view that this position is potentially not defensible for the following reasons: 7. 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</i>	Addressed within Section 6.2.5. Comment closed.

			<p>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>any significant adverse effects as a result of the Proposed Development. Therefore, there are no significant effects to categorise using these descriptors.</p>	<p><i>direct effects and any indirect, secondary, cumulative, transboundary, short-term,</i></p> <ul style="list-style-type: none"> <i>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>	
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</p>	<p>Noted. This would be best secured by a planning condition.</p>	<p>Agreed.</p> <p>Comment closed.</p>	N/A

			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.			
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>	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.	The text was not clear, but noted with the confirmation.	N/A
29	Section 15.2	Chapter 12: Noise and vibration	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	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	<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 	<p>Addressed within Section 6.2.6.</p> <p>Comment closed.</p>

			<p>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>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>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,</i></p> <ul style="list-style-type: none"> <i>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>	
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</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</p>	<p>Noted.</p> <p>Comment closed.</p>	N/A

			<p>“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>submitted with the planning application.</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>	<p>Addressed within Section 6.2.7.</p> <p>Comment closed.</p>

32	Section 16.2	Chapter 13: Socio-economics	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.	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).	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	Chapter 8 of the ES Addendum concludes that there are no significant cumulative effects in relation to socio-economics predicted. Comment closed.
33	Section 16.2	Chapter 13: Socio-economics	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	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	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</i>	This is now assessed in Chapter 7 of the ES Addendum. Comment closed.

			<p>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>beneficial effect related to employment generation for the lab-led scenario would be direct and permanent.</p>	<p><i>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> <ul style="list-style-type: none"> 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>	
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</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</p>	<p>Noted.</p> <p>Comment closed.</p>	N/A

			<p>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 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</p>	<p>potential for significant effects outside the study area, relevant views have been included in the visual assessment.</p>		
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			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.	An update to the NTS has been provided. Comment closed.
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	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	It is Buro Happold's view that this position is potentially not defensible for the following reasons: <ul 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 / 	As above, comment now closed.

			Opinion, EIA Regulations and the IEMA EIA Review Criteria.	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.	<p>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,</i></p> <ul style="list-style-type: none"> <i>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>	
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	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.	N/A

				inappropriate to use these as the basis for advice to a planning authority on the fitness of an ES to support a planning determination.		
			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	Closed, as 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	Closed, as 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	Closed, as 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	Closed, as 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	Closed, as 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.	N/A
		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	Closed, as 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.	N/A
		COM6 iii) The anticipated timescales of demolition and	See response to item 5 above.	See Buro Happold response above	Closed, as above.

			construction are not set out fully as per the comments raised on Chapter 3 Proposed Development.			
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