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Turley
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17 Gresse Street
London
W1T 1QL

Application Ref: 2017/3847/P

Please ask for: **Gavin Sexton**
Telephone: 020 7974 3231

Date: 10th October 2017

Dear Oliver

**Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

Re: Redevelopment of petrol filling station site and the main supermarket site (abbreviated).

In July this year you submitted a planning application for redevelopment of the Morrison's sites at Camden Goods Yard. A number of technical documents supported this application, including an Environmental Statement (ES) dated 30th June 2017.

As you are aware the application has undergone consultation and feedback has been forthcoming from a variety of sources, including the Greater London Authority. Although the local planning authority's assessment of the application documentation is not yet complete, we require certain revisions and supplementary clarifications to the submission documents and drawings in order to progress our assessment.

Please provide the following information to amplify, amend or verify the information contained within the application documentation, which may include elements of the ES and its accompanying documents. It would be helpful if you accompanied the information with an assessment of any impact of the new information on the conclusions and mitigation measures proposed by the ES, if elements within its scope have changed.

Please note that comments relating to design and landscaping matters are included under separate correspondence.



Transport & Accessibility: Chalk Farm road junction

Please update the design of the Chalk Farm Road (CFR) junction and the relevant Transport Assessment details in accordance with the comments below:

1. A loading and parking survey is required to justify the relocation of 20m of existing P&D bays on CFR. We have sent a survey specification and guidelines under separate cover. Please commission a survey and submit the results for assessment.
2. If Pay & Display bays are to remain for CFR eastbound we expect 2 x traffic lanes min 3m width plus a cycle feeder lane 1.5m width, exit traffic lane westbound 4m, remove westbound cycle lane
3. The pedestrian island for the informal crossing should be removed at this stage in the design
4. Advanced Stop Lines need to be 5 metres deep for CFR eastbound.
5. We have concerns about cycle safety for cyclists passing the exit of the PFS. Please include a cycle lane at the mouth of the PFS similar to the cycle lane image in Appendix A.
6. Parking provision on the PFS site during the temporary supermarket phase should be reduced. The service bay for the temporary superstore arranged should be moved on site and off the road and should replace parking spaces within the building footprint. A cycle lane should replace the loading bay.
7. The 2 lanes exiting Juniper Crescent should each be 3 metres wide.
8. The stop line back for vehicles exiting the PFS should be moved back so cyclists have clearer access to the cycle lane.
9. We require details of the existing and proposed Method of Control (MoC) once the alterations are complete.
10. We require the modelling in a LINSIG file with results populated in the template provided under separate cover.
11. We required CAD drawings of the junction design.
12. Please complete the Modelling output template sheet, provided under separate cover.

Transport & Accessibility: Travel Plan

We require an updated Travel Plan (TP) which is more site specific. It should include specific detailed measures to reduce supermarket shopper dependency on carparking, including, *inter alia*, initiatives from the supermarket operator to proactively assist nearby residents to move away from car use when shopping, for example by home delivery of purchased trolley items, provision of cargobikes etc.

Comments on specific TP elements:

- 4.10 : Please include surveyed barriers or reasons for not walking/cycling for all or part of the trip.
- 4.11 : Please update action plan and targets at this point.
- 4.12 appears to contradict 4.10. We feel that the phrasing in 4.10 should be adopted for consistency and that each Travel Plan for Residential, office and retail should complete a full 5 year monitoring, with surveys and reviews completed in years 0, 1,3 & 5.
- 5.3 Please include as an objective: reduction of passenger numbers stress and overcrowding of Camden Town Tube by promoting alternative stations for the new site (i.e. Chalk Farm).

- 5.4 TPCs: Please provide details of how TPC posts will be funded.
- 6.19 - All monitoring and notification of monitoring dates should be notified to LBC Travel Plan Officer

Please include consideration of the following means of promoting modes sustainable modes of transport:

Walking:

- Walking route to Chalk Farm Station (as opposed to Camden Town), including:
- Walkit.com (www.walkit.com/london)
- TfL Journey planner <https://tfl.gov.uk/modes/walking/>
- leisure routes such as Belsize Walk and strategic routes on Walk London.
- Walk to Work Week and organisations such as The Ramblers to engage people in walking.
- Legible London signage
- Walk4life and Walk4Life find a walk. <http://www.walk4life.info/find-a-walk>

Cycling

- Cycle training and membership organisations such as LCC, CTC (Cycling UK), British Cycling (and related programmes to engage people in cycling),
- Cycle skills courses and related social media work undertaken by Camden Council (www.facebook.com/cyclingcamden).
- Bike Week, Cycle to Work Day, 'Lets Ride' British Cycling Initiatives including led rides, Breeze and Ride Social Rides, Ride London,
- London Cycle Guides, Cycle Streets Journey Planner, TfL Cycle Journey Planner.
- Cycle security and bike marking schemes to reduce bike theft
- E-bike advantages for those with a longer commute/carrying loads.
- Cargo bike promotion for superstore
- Personalised travel planning

Public Transport

- Use of Chalk Farm Station (as opposed to Camden Town)
- TfL Journey Planner and National Rail journey planner.
- TfLs Safer Travel at Night campaign relating to safety on public transport and the use of licensed Private Hire and Black Cabs.
- Timetables and ticketing, spider maps for bus services including night buses.
- Apps to facilitate mobile handset planning of public transport trips and awareness of network issues and problems.

Transport & Accessibility: Accessibility

1. Shared spaces with level surfaces can be problematic in terms of inclusive design where it involves the removal of kerbs. Schemes should incorporate a 'safe zone', to delineate optional routes specially for pedestrians only, to ensure people have the option of a route they can feel safe using. Please provide further information on how this issue will be resolved by the development.

2. Clarification is needed about the details of the public lifts : their size and capacity, provision of level landing at least 500mm deep in front of entrances etc. Please clarify where seating may be provided close to the lifts and how the artwork to be applied to the lifts will ensure that the lifts remain apparent.
3. Please confirm that all external seating will incorporate back rests and arm rests to satisfy BS8300:2009 + A1:2010.
4. Please confirm whether all external steps on primary access routes will be designed in accordance with Approved Document M, incorporating the correct design features to ensure they are as safe and usable as possible for as many people as possible.
5. 6% of the total supermarket car park capacity should be provided as disabled persons parking bays from the outset. A further 4% of the total capacity should be enlarged standard spaces (3.6m x 6m) that can be adapted to be disabled persons parking bays in the future if required.
6. Please demonstrate how additional (in addition to the 20 proposed) disabled persons parking bays for residents who require them could be provided in the future if required.
7. please consider upgrading lifts around this development to fire evacuation lifts to allow people who require level access to potentially use them for evacuation purposes (in conjunction with a suitable fire evacuation management strategy).
8. Please review whether the 12 residential units which won't have step free access can be made fully accessible.
9. Please review the potential to provide a clear opening width of 850mm per door leaf.
10. Please note that BS9999:2008 has been superseded by BS9991:2015.

Transport & Accessibility: Other transport concerns

Please provide details to revise/clarify the following issues:

1. We require a qualitative assessment of the public realm on the approach to the site from CFR to the site side of the railway bridge.
2. Please amend the Servicing Management Plan to cover requirements of the Petrol Filling Station, both in its temporary supermarket form and final layout. In particular this should address details of the number of deliveries per week and the management regime for ensuring that delivery vehicles and petrol tankers would exit the site without avoid conflicts with pedestrian, cycles and other motor vehicles (for example through the use of traffic marshalls).
3. Please provide an overall strategy for cycle parking per block: setting out policy requirements, level of provision, details of access and additional facilities (showers etc) where relevant.
4. The street crossing at Block A should be moved further south to make it more apparent in approaches from Roundhouse Way. This may involve changes to the bus stops/stands
5. Please submit an update to the Road Safety Audit
6. We would like details of the options examined for locations for the bus infrastructure (stops, stands, turning spaces) and an explanation of the reasons for any rejected options and behind choosing the proposed
7. The turning/manoeuvring details for service/emergency vehicles on site should be reviewed and updated. We require turning details for the vehicle movements associated with all loading bays (including beside the concierge and at end of Maker's Yard).

8. Please confirm the location and number of electric vehicle parking spaces.
9. With regard to Appendix E : Please provide AM and PM peak flows in and out of the temporary store for Demolition and construction flows. Please clarify which scheme the “CUMULATIVE SCHEMES CONSTRUCTION PCU FLOWS – DAILY” refers to.

Trees and green roofs

- Please provide details of existing and proposed tree planting, including details of types of trees and their planting sizes and further details of the tree pits (where relevant) and their ability to sustain the size of proposed trees.
- Please clarify the substrate depths for the green roofs and reduce the extent of Sedum planting or justify why so much is proposed and where the biodiversity benefits would be.

Daylight

- Please provide window maps/ diagrams to clarify which windows/ rooms the VSC and NSL statistics relate to.
- Please provide a window map for the consented development at 100 Chalk Farm Road to clarify the results of ES paras 10.371- 374, as an addendum to Appendix 2 of the ES.

Acoustic impact

1. Please provide an updated acoustic report with references to the standards in the Local Plan 2017.
2. The development should be designed to achieve noise level on balconies and external amenity areas the noise standard specified in BS8233:2014 for internal rooms and external amenity areas. Please clarify in the amended Acoustic report which, if any, external private amenity spaces fail the Camden Local Plan 2017 noise standards and what mitigation has been considered/included to address any shortcomings.
3. The surrounding area includes a wide range of commercial, retail and entertainment uses, including Camden Market, Proud night club along with residential development. The area regularly has extended entertainment hours. Please provide details of the entertainment activities which took place in the area during the survey period and evidence that the noise from the local entertainment premises is representative of event types to ensure the robustness of the survey data.

Air Quality

1. Please confirm:

- a. Whether roadside emissions have been excluded from the results in table 6.7 of the Air Quality Assessment, and confirm why these figures are fairly low, given the location of existing receptors. The impact rating comparing the 'with development' to 'without development' should be provided.
 - b. The number of car parking spaces and electric vehicle charging points.
2. We require the potential congestion impacts of the development (particularly the PFS) within the AQA to be modelled.
 3. An updated Air Quality Neutral assessment is required, including transport emissions from supermarket and PFS and including the building emissions.
 4. Please outline the assumptions used in the construction phase assessment to determine the risk levels and outline the full list of mitigation measures proposed.
 5. Please provide dispersion modelling at a variety of heights and locations across the development, and include receptors which would be at greatest risk of plume dispersion impacts.

Surface Water and Flood Risk

1. The total existing approximate surface water run-off rate for the application site is stated as being 387.7l/s. The proposals include a reduction in run-off rates by 50% of existing values, to 167.7 l/s for the Main Site and 26.1l/s for the PFS parcel, which results in a total of 193.8l/s for the entire application site. However these figures do not match up to the figures which are summarised in the table below. Please clarify.

	Existing Rates (l/s)	Proposed Rates (l/s)	Difference (l/s) (Proposed-Existing)	% Difference (difference /existing x 100)
Greenfield QBAR		N/A	N/A	N/A
1 in 1	134.2	167.7	None	None
1 in 30	335.4	167.7	167.7	50%
1in 100	431.2	167.7	263.5	61%
1 in 100 plus climate change	N/A	167.7	N/A	N/A

1. The submission determines that 1,439m³ of storage is required to meet greenfield run-off rates and 723m³ of storage is required to meet 50% reduction in existing run-off rates (limiting flows to 193.8l/s). Please clarify how these volumes are calculated.
2. Furthermore, the applicant states elsewhere in the report that 653m³ storage is required for the Main Site to limit flows to 167.7 l/s (based on a peak 1 in 100 year plus 40% climate change storm) and 92m³ is required to limit flows to 26.13 l/s

for the PFS site (based on peak 1 in 100 year plus 20% climate change storm) – these figures appear to be inconsistent and require clarification from the applicant.

3. Flow rates across the site are proposed to be limited to 193.8l/s, based on 50% reduction in peak rate (30 year). Please clarify what would happen in an exceedance event (i.e. flow paths and collection points for rainwater). The site is located within the sensitive Counters Creek catchment area. Thames Water have objected to the 50% runoff reduction and expect the development to achieve greenfield run-off rates. Please clarify whether further SUDS options have been explored which would help to reduce flows further (including permeable paving, which has been discounted due to maintenance concerns, or permeable landscaping/ raingardens) and what effort have been made to achieve greenfield runoff rates.

Construction Management

Please update the CMP with the newer version (v2.2) of the Pro-forma from the Camden website.

- Q10: Please provide a higher resolution version of the project gantt chart.
- Q11 and Q22: Delivery hours should be updated to ensure that deliveries vehicles do no park or wait outside the site and that deliveries occur between the times are of 9:30 -4:30 Monday to Friday, 8:00-13:00 Saturday, with no deliveries Sunday or Bank Holiday. Any essential deliveries outside these times will need to be agreed with the Council in advance
- Q16: Please include reference to the Council's emerging Chalk Farm Road Scheme which is currently under preparation and take account of recent consent at 5-17 Haverstock Hill and potential alterations to Camden Town Tube Station (this may not affect you, but worth noting as it may affect workers on site).
- Q21: the number of demolition deliveries is much lower than we would expect considering the amount of materials that will have to be removed from the site. Please provide details of the methodology confirming how these amounts were calculated.
- Q27: please provide the images in high resolution.
- Please provide details of how you have explored the use of alternative modes of transport to minimise the vehicle trips during demolition and construction. In particular you should assess the potential for using rail and/or canal modes.

Energy Statement and Sustainable Design and Construction

1. Please confirm if the penthouses, which fail the overheating criteria, are included within the glazing ratios in the Energy Statement which range from 8.33% - 35.72%.
2. Please clarify the pv coverage of Blocks A, B, C. For Block F please clarify whether other solar technologies have been considered (e.g. solar tiles) or whether the roof can be designed to accommodate renewables (i.e. designed with easy access to the roof/ designed to be flat on these blocks).

3. Please confirm that all non-residential spaces are covered by a BREEAM assessment (including the supermarket, leisure centre, shell and core retail areas etc.). Where any areas are to be excluded from scope, this should be justified.

Sustainability plan

1. For block F please should confirm if further mitigation is proposed in apartments which are identified as failing the overheating test in order to reduce overheating risk.
2. Please provide further details on the measures taken to reduce heat gains from the heat network, and provide confirmation that the network will be designed in line with the CIBSE Code of Practice.
3. Please detail how sustainable design and construction principles (including those relating to material selection and waste management) have been incorporated into the residential parts of the development.
4. Please confirm how the remaining ground level landscaping will be irrigated and whether drought resistant species have been considered.
5. Please explain why grey water harvesting has been discounted from the design.

Basement construction

Groundwater Level

- Based on all the information provided, it is not considered that assuming the groundwater level at 15mbgl is a conservative approach. With the current ground model showing a made ground thickness of up to 8.0m overlaying London clay, the explanation provided is insufficient to backup the use of groundwater at 15mbgl. This assumption must be adequately clarified or, as an alternative, a different groundwater level must be used.

Yours sincerely,

Gavin Sexton
Principal Planner

On behalf of the Director Supporting Communities

Appendix – Cycle lane image

