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Dear Gavin

**ENVIRONMENTAL IMPLICATIONS LETTER: PROPOSED SECTION 73
MINOR MATERIAL AMENDMENT TO PLANNING CONSENT
2017/3847/P, AS AMENDED, FOR CAMDEN GOODS YARD PETROL
FILLING STATION PARCEL, CAMDEN**

Date 03/01/2020

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Ref L1620008029_05_Camden
Goods Yard S73 EIL

We write to you on behalf of our client, St George West London Limited (the 'Applicant') regarding the proposed Minor Material Amendment application to be made under section 73 of The Town and Country Planning Act 1990 (the 'S73 application') in respect of the 'Camden Goods Yard' project which was granted full planning consent in June 2018 (the 'June 2018 consented scheme'). The S73 application seeks to make the following amendments to the consented proposals for the Petrol Filling Station parcel (the 'PFS parcel') of the June 2018 consented scheme:

- Amend the construction start date for the PFS parcel from Quarter 1 2019 to Quarter 1 2020 and completion from Quarter 3 2020 to Quarter 1 2021.
- Deliver a 1,403 m² Gross External Area (GEA) temporary store on the PFS parcel in a one storey pre-fabricated building reaching a maximum height of 34.037 m above ordinance datum (AOD), instead of in the final PFS building structure.
- Amend the car and cycle parking provision from the consented 61 car parking spaces and 62 cycle parking spaces to 25 car parking spaces, including two accessible spaces, and 48 cycle parking spaces.
- Relocate the delivery bay from the Juniper Crescent carriageway to internally along the western elevation of the temporary store.
- Extend the operation of the temporary store from 30 to 50 months.

This Environmental Implications Letter (EIL), also referred to as a Statement of Compliance (SoC), reports on the implications of the proposed amendments and of the amended proposed development as a whole (the 'January 2020 amended proposed development') in respect of the conclusions of the Environmental Impact Assessment (EIA) that was undertaken of the June 2018 consented scheme, so that the London Borough of Camden (LBC) has appropriate and up-to-date environmental information on the amended proposed development's environmental effects, to enable the determination of the S73 application.

1. Project Background

In June 2017 a full planning application (ref: 2017/3847/P) was submitted by Safeway Stores Limited and BDW Trading Limited (the 'former Applicant') to the LBC for the redevelopment of a 3.26 hectare (ha) site located off Chalk Farm Road, adjacent to Juniper Crescent and Gilbeys Yard in Chalk Farm, Camden (the 'application site') to deliver the following:

"Redevelopment of petrol filling station site to include the erection of a new building of up to six storeys and up to 11,243 sq m GEA floorspace to accommodate a petrol filling station (Sui Generis use), flexible retail/food & drink floorspace (Class A1, A3 uses), Class B1 floorspace and a winter garden; with cycle parking, public space, public toilets and other associated works and highways works; all following demolition of existing petrol filling station. Use of part ground/1st floors as a foodstore (Class A1 use) with associated car parking for a temporary period of up to thirty months.

Redevelopment of the main supermarket site to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) of up to 14 storeys accommodating up to 573 homes (389 market and 184 affordable in up to 60,568 sq m GEA of residential floorspace) together with up to 28,345 sq m GEA non-residential floorspace comprising foodstore (class A1), flexible retail/food & drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class D2), roof level of 'Block B' for food and plant growing/production facility including small scale brewing and distilling (Sui Generis use); with associated ancillary office, storage, education, training, cafe and restaurant activities; together with new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works, including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of foodstore."

The full planning application was accompanied by an EIA (the '2017 EIA') undertaken in accordance with the 2011 EIA Regulations (as amended in 2015). The outcomes and conclusions of the 2017 EIA were reported in an Environmental Statement (the '2017 ES').

Subsequent to the grant of planning consent, the following applications have been submitted to the LBC between January 2019 and June 2019 for non-material amendments to the June 2018 consented scheme:

- 6 February 2019 section 96A (S96A) application to make non-material amendments to the wording of planning conditions 47, 48 and 49 (2019/0153/P); and
- 4 July 2019 S96A application to make non-material amendments to planning conditions 29, 50 and 60 (2019/2962/P).

Both these S96A applications have been granted planning consent. Due to the non-material and insignificant nature of these amendments, the 2017 EIA/ES was not updated. Therefore, this letter continues to refer to the original 2017 EIA/ES and the June 2018 consented scheme.

The Applicant was subsequently selected to deliver the June 2018 consented scheme and now proposes to make minor material amendments to the June 2018 consented scheme.

The Applicant submitted a S96A application on 18 December 2019 to the LBC (2019/6301/P) to amend the proposed development description for the June 2018 consented scheme as follows:

"Redevelopment of petrol filling station site to include the erection of a new building of up to six storeys and up to 11,246 sqm GEA floorspace to accommodate a petrol filling station (Sui Generis use), flexible retail/food & drink floorspace (Class A1, A3 uses) , Class B1 floorspace and a winter garden; with cycle parking, public space, public toilets and other associated works and highways works; all following demolition of existing petrol filling station; use for a foodstore (Class A1 use) with associated car parking for a temporary period.

Redevelopment of the main supermarket site to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) of up to 14 storeys accommodating up to 573 homes (389 market and 184 affordable in up to 60,568 sq m GEA of residential floorspace) for together with up to 28,345 sq m GEA non residential floorspace comprising foodstore (class A1), flexible retail/food & drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class D2), roof level of 'Block B' for food and plant growing/production facility including small scale brewing and distilling (Sui Generis use); with associated ancillary office, storage, education, training, cafe and restaurant activities; together with new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works, including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of foodstore"

This S96A application was consented on 24 December 2019 and therefore the S73 application will be submitted pursuant to this latest consent. As this S96A does not affect the conclusions of the 2017 EIA or the nature and scale of the June 2018 consented scheme upon which the 2017 EIA was based, this letter continues to refer to the 'June 2018 consented scheme'.

2. Proposed Amendments

The 2018 June consented scheme comprises two parcels, namely the existing Morrisons supermarket parcel (the 'MS parcel') and the PFS parcel. A temporary Morrisons store (approximately 1,450 m² Gross External Area (GEA)) was proposed to be operational for up to 2.5 years (30 months) during the construction of the replacement Morrisons supermarket on the MS parcel. The temporary store was due to be operational at the ground and first floor levels of the final PFS building and would have provided 61 on-site car parking spaces (the 2017 ES referenced 65).

The S73 application proposes the following amendments to the PFS parcel:

- Amend the construction start date for the PFS parcel from Quarter 1 2019 to Quarter 1 2020 and completion from Quarter 3 2020 to Quarter 1 2021.
- Deliver a 1,403 m² GEA temporary store on the PFS parcel in a one storey pre-fabricated building reaching a maximum height of 34.037 m above ordinance datum (AOD), instead of in the final PFS building structure.
- Amend the car and cycle parking provision from the consented 61 car parking spaces and 62 cycle parking spaces to 25 car parking spaces, including two accessible spaces, and 48 cycle parking spaces.
- Relocate the delivery bay from the Juniper Crescent carriageway to internally along the western elevation of the temporary store.
- Extend the operation of the temporary store from 30 to 50 months.

Access would be served by a priority-controlled T-junction at the eastern edge of the site. The existing two-lane egress to the north-west of the PFS parcel is to be closed off and consolidated to a single lane egress point, to be utilised solely by delivery vehicles associated with the temporary store.

The updated construction and demolition programme is presented in Table 1.

Table 1: PFS Parcel Demolition and Construction Programme

PFS Parcel (temporary supermarket)	Consented Start Date	Proposed Start Date	Consented Completion Date	Proposed Completion Date
Demolition and Enabling Works, Substructure and Tanks	Q1 2019	Q1 2020	Q4 2019	Q4 2020
Frame/Superstructure, Façade/Cladding and Fit Out	Q3 2019	Q2 2020	Q3 2020	Q1 2021

There would be no amendments to the MS parcel or to other elements of the June 2018 consented scheme with respect to the ventilation, servicing, drainage, energy, waste and landscaping strategies. However, these strategies have been updated as appropriate for the temporary store and will be submitted alongside the S73 planning application. By the very nature and the small scale of the temporary operations, plant emissions and waste arisings would not give rise to significant effects.

The June 2018 consented scheme, as amended by the S73 application, is referred to as the 'January 2020 amended proposed development'.

3. Approach to Consideration of Environmental Effects

Ramboll, on behalf of the Applicant, submitted an informal EIA Scoping Opinion Request letter to the LBC on 17 October 2019 which outlined the proposed scope of and approach to the updated EIA of the proposed amendments and of the amended proposed development as a whole, as well as the reporting format (see **Appendix 1**). The approach was agreed by the LBC on 4 November 2019.

Ramboll and relevant environmental specialists have reviewed the January 2020 amended proposed development, whilst considering the potential implications for the likely environmental effects reported within the 2017 ES. Consideration has been given to:

- any changes to legislation, policy and assessment methodologies since the 2017 EIA;
- any changes in baseline conditions since the 2017 EIA;
- the conclusions of 2017 EIA for June 2018 consented scheme; and
- any changes to the 2017 EIA conclusions as a result of the January 2020 proposed amended proposed development, as well as cumulative effects.

A summary of the updated, new or emerging legislation, policy and assessment guidance is presented in Section 4 (legislation and policy).

In respect of cumulative schemes, there have been no new potential cumulative schemes submitted to the LBC since the 2017 ES was prepared. However there have been minor and non-material amendments to four current cumulative schemes as presented in Table 2.

Table 2: Updates to 2017 ES Cumulative Schemes

Application Reference	Scheme	Status	Application Reference	Description
2015/4562/P (2016/3940/P and 2012/4628/P)	Site at Hawley Wharf Land bounded by Chalk Farm Road, Castlehaven Road, Hawley Road, NW18RP	Granted	2015/4562/P	S73 application to vary condition 65 – namely to change materials on elevation of market building from timber to terracotta

Table 2: Updates to 2017 ES Cumulative Schemes

Application Reference	Scheme	Status	Application Reference	Description
2016/6891/P	1 Centric Close, NW1 7EP	Granted subject to a S106	2019/2329/P	S96A application to alter the size of the windows on the north flank elevation to match the size of the openings on the approved floor plans
2017/1407/P (2017/0492/P and 2014/7908/P)	140-146 Camden Street, NW1 9PF	Granted	2017/6720/P	S96A application to alter Block A lightwell and railings, omission of ground floor balcony, removal of courtyard lightwell, repositioning of Block B access, re-arrangement of wheelchair unit at ground floor, lighting design, addition of private terraces in courtyard, security fencing, commercial access repositioned, ground floor recess omitted, stair access to communal terrace added, changes to window design and faience columns and repositioning of lift
2015/6240/P, (2015/3396/P, 2015/5160/P, 2015/3443/P, 2014/5730/P AND 2013/8088/P)	Camden Collection, Agar Grove Estate, Site 1, Agar Grove, NW1 0RG	Granted	2015/3396/P	S96A application for changes to the levels, footprint, height, window positions, lowering of top canopy, fixing of previously movable screens and various other associated works
			2014/5730/P	S96A application for changes to the footprints, heights, window positions and cores of blocks A, F, G and H, building fold line and brick work on block A, and other associated works

In respect of the HS2 cumulative scheme, an application for the lorry routes to and from the Euston Approaches worksite and Adelaide Road worksite associated with works for HS2 was submitted in September 2019 (2019/4700/HS2) for the following main works activities:

"Construction of the Park Village East retaining wall, portal and high-speed dive unders including the installation of ground anchors; Removal of excavated material from the station approach, tunnel portal and headhouse works; Construction of the decks over the high-speed dive under and railway south of Mornington Street Bridge; Construction of the west and east side retaining wall around Hampstead Road Bridge; Extension of Hampstead Road Bridge as well as associated utilities and highway works; Support the movement of plant and material down into the Euston approach railway cutting; Support the removal of excavated material generated in the railway cutting; Construction of Adelaide Road vent shaft and single storey headhouse building; and all other activities for the purposes and in connection with the scheduled and ancillary works. Incorporating lorry routes detailed in 'List of Roads for Approval' document."

A review of the documents submitted within 2019/4700/HS2 does not reveal any further detailed information regarding the construction arrangements within the study area, and in particular from Juniper Crescent. The environmental implications of the proposed amendments and of the January 2020 amended proposed development as a whole are presented in Section 5.

4. Legislation and Policy

EIA Regulations

The 2017 EIA was carried out pursuant to the 2011 EIA Regulations (as amended in 2015) as agreed with the LBC. In respect of the subsequent 2017 EIA Regulations which were published in May 2017, the following is noted:

- Health was fully considered in the design of the June 2018 consented scheme through the provisioning of on-site open space, amenity, employment and community space. Furthermore, the socio-economic, air quality, noise and vibration, daylight and sunlight assessments have had regard to the health of the newly introduced on-site residential population, as well as off-site residential receptors. The January 2020 amended development would not alter any of these considerations.
- Climate change effects, greenhouse gas emissions, and resilience were considered in the design of the June 2018 consented scheme in respect of the energy strategy and drainage strategy (and associated flood risk assessment), as well as the potential for overheating. Furthermore, the air quality assessment had regard to vehicle and heating plant emissions. The January 2020 amended development would not alter any of these considerations.
- The nature of the June 2018 consented scheme is such that it is unlikely to result in major accidents and/or disasters. The design of the proposals took account of potential man-made emergencies and accidents such as fire and surface water flooding. The January 2020 amended development would not alter any of these considerations.

Accordingly, this letter, when read together with the 2011 EIA Regulations (as amended in 2015) satisfies the environmental considerations of both the 2011 EIA Regulations (as amended in 2015) and the 2017 EIA Regulations.

National Legislation and Policy

In respect of policy and guidance at a national level:

- In March 2012, the Government published the National Planning Policy Framework (NPPF)¹ which replaced all Planning Policy Statements (PPS) and Planning Policy Guidance (PPG). The NPPF was designed to stimulate growth, to promote sustainable development and to make the planning system less complex and more accessible. The NPPF did not alter the key considerations outlined in the PPS and PPG and is supported by more detailed online and regularly updated Planning Practice Guidance. The new NPPF published in July 2018, with minor revisions made in February and June 2019.

The 2019 amendments include minor changes to policy in relation to five-year housing supply and housing and economic need assessments. Additionally, the ambiguity concerning the assessment of developments that are detrimental to existing habitats has also been resolved. Policies concerning transport remain unchanged and the framework continues to be grounded on a 'presumption in favour of sustainable development'. Defra published a new Clean Air Strategy² in 2019 which identifies the requirement for significant improvement in air quality and outlines a number of actions.

In respect of the PPG, regular updates have been made in respect to Environmental Impact Assessment guidance.

¹ Ministry of Housing, Communities and Local Government, June 2019. National Planning Policy Framework. London. HMSO.

² Department for Environment, Food and Rural Affairs, 2019. Air Quality: Clean Air Strategy 2019 [online]. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

These new and revised documents have been reviewed in respect of each environmental topic and it has been concluded that there are no updates of material consideration that would affect the assessment scopes and methodologies of the 2017 EIA. These documents have therefore not been considered further within this letter.

Regional Policy

At a regional level, the following is noted:

- The draft London Plan, including Consolidated Suggested Changes was published in July 2019 following Examination in Public (EiP) in January-May 2019³. On 9 December 2019 the Mayor issued his 'Intending to Publish' version of the draft London Plan' to the Secretary of State and the adoption of the New London Plan is expected in February/March 2020.
- The Mayor's Transport Strategy (MTS)⁴ was published in March 2018 and was developed in conjunction with the new Draft London Plan and the draft Economic Development Strategy for London (December 2017) as part of a strategic policy framework to support the development of London over the next 25-year period. The MTS outlines the Mayor's vision and how Transport for London (TfL) and its partners aim to achieve this. Three key themes are at the heart of the strategy, namely healthy streets and healthy people; a good public transport experience; and new homes and jobs.
- The London Environmental Strategy⁵ was published in May 2018 which provides new approaches to transforming London's environment in terms of air quality, green infrastructure, climate change, waste, noise and a transition to a low carbon economy.
- The Affordable Housing and Viability Supplementary Planning Guidance (SPG)⁶ was published in August 2017. The new SPG supersedes section 3.3 (Build to Rent) and Part 5 (Viability) of the March 2016 Housing SPG; and the rest of the Housing SPG remains current.

None of the above documents introduce new issues for consideration and does not affect the assessment scopes or methodologies of the 2017 EIA. Accordingly, these documents have therefore not been considered further within this letter.

Local Policy

At a local level, the LBC adopted the Camden Local Plan⁷ in July 2017 which supersedes the Camden Local Plan Submission Draft (2016)⁸. The Camden Local Plan Submission Draft was a material consideration in the 2017 EIA. The publishing of the Camden Local Plan does not introduce new issues for consideration and does not affect the assessment scopes or methodologies of the 2017 EIA.

In addition, the LBC published the Camden Goods Yard Planning Framework SPD⁹ in July 2017. The SPD was considered in the 2017 EIA and does not introduce new issues for consideration and does not affect the assessment scopes or methodologies of the 2017 EIA.

Accordingly, these documents have therefore not been considered further within this letter.

³ Greater London Authority, August 2018. Draft New London Plan. London. GLA.

⁴ Greater London Authority, 2018. Mayor's Transport Strategy. London. GLA.

⁵ Greater London Authority, 2018. London Environment Strategy. London. GLA.

⁶ Greater London Authority, 2017. Affordable Housing and Viability Supplementary Planning Guidance 2017. London. GLA.

⁷ London Borough of Camden (LBC), 2017. Camden Local Plan. London, LBC.

⁸ London Borough of Camden, 2016. Local Plan Submission Draft. London. LBC.

⁹ London Borough of Camden, 2017. Camden Goods Yard Planning Framework. London. LBC.

5. Summary of Environmental Considerations

Table 3 presents the conclusions of the updated assessment of the January 2020 amended proposed development.

Amended Proposed Development Effects

No changes are anticipated to the conclusions of the 2017 EIA with respect to Socio-Economics; Transport and Accessibility; Air Quality; Noise and Vibration; Daylight, Sunlight and Overshadowing; Wind; Townscape and Visual; and Heritage. However, for completeness, a technical note relating to the change in traffic has been appended to this letter (**Appendix 2**).

In respect of topics previously scoped out of the 2017 EIA (Ground Conditions, Ecology, Flood Risk and Archaeology), the following is noted:

- Ground Conditions: The remediation strategy prepared for the June 2018 consented scheme remains valid.
- Ecology: A Preliminary Bat Roost Assessment was undertaken in November 2019 to discharge planning condition 54, which is currently pending consideration by the LBC. The report confirms the site conditions remained as previously reported. No evidence of bats was recorded and as such the assessment ruled out the reasonable likelihood of a bat roost being present.
- Flood Risk: The EA flood designation and drainage strategy presented in the 2017 ES remain valid.
- Archaeology: Since planning consent, an archaeological mitigation strategy for the application site has been agreed with the LBC and their planning advisors, Historic England. This is set out in the Written Scheme of Investigation for an archaeological watching brief dated June 2019 (Revised Version), prepared by RPS Group.

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
<i>ES Chapter 6: Socio-economics</i>			
<p>There has been no new or updated socio-economic guidance that would affect the scope and methodology of the socio-economic assessment in the 2017 EIA. The proposed amendments and the January 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment.</p>	<p>Whilst baseline conditions in respect of healthcare and educational provision may have changed since the 2017 EIA, it is considered that there would be no material change to the baseline conditions as described for the socio-economics assessment in the 2017 ES. Furthermore, necessary S106 contributions have been secured as appropriate, with the proposed amendments and amended proposed development as a whole not introducing any new socio-economic effects in respect of healthcare and educational provisioning that would require updated assessments. Therefore, the baseline conditions set out in the 2017 EIA, remain valid for the updated assessment.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>Support construction employment:</p> <ul style="list-style-type: none"> • Negligible (neighbourhood level) • Minor Beneficial (local and wider levels) <p>Support construction apprenticeships:</p> <ul style="list-style-type: none"> • Major Beneficial (local level) • Minor Beneficial (wider level) <p>Generate construction productivity:</p> <ul style="list-style-type: none"> • Minor Beneficial (local and wider levels) <p>Generate expenditure:</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) • Negligible Beneficial (local and wider levels) <p><u>Completed Development</u></p> <p>Increase employment opportunities:</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood and local levels) • Negligible (wider level) <p>Enhance local labour provision and skills:</p> <ul style="list-style-type: none"> • Major Beneficial (neighbourhood level) • Moderate beneficial (local level) • Negligible (wider level) <p>Increase local business space and support business activity:</p>	<p>As the proposed amendments would result in the introduction of a temporary structure during the demolition and construction stage, there would likely be a very marginal increase in construction employment (and associated construction expenditure); however, this would not affect the overall scale or nature of demolition and construction effects and therefore the conclusions of the 2017 EIA.</p> <p>The overall completed development stage quantum and nature of land uses would remain consistent with that previously environmentally assessed for the 2017 EIA, with the overall residential unit numbers, residential floorspace, unit and tenure mix, as well as the overall quantum and type of non-residential floorspace remaining unchanged.</p> <p>The resulting operational employment yield and secondary spending, population, child yield and play space would therefore remain unchanged.</p> <p>Additional mitigation would not be required.</p> <p>Accordingly, no new or amended significant socio-economic effects are likely to arise for the January 2020 amended proposed development.</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended significant socio-economic effects have been reported for the January 2020 amended proposed development.</p>

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
		<ul style="list-style-type: none"> • Minor Beneficial (local level) Provide new housing, including affordable: <ul style="list-style-type: none"> • Minor Beneficial (local level) Generate income and expenditure: <ul style="list-style-type: none"> • Major Beneficial (neighbourhood level) • Moderate Beneficial (local level) • Negligible Beneficial (wider level) Generate Council Tax revenue <ul style="list-style-type: none"> • Moderate Beneficial (local level) Generate New Homes Bonus payments <ul style="list-style-type: none"> • Major Beneficial (local level) Generate business rate revenue <ul style="list-style-type: none"> • Moderate Beneficial (local level) Increase demand for primary education facilities <ul style="list-style-type: none"> • Negligible (neighbourhood level) Increase demand for secondary education facilities <ul style="list-style-type: none"> • Minor Adverse (neighbourhood level) Increase demand for health education facilities <ul style="list-style-type: none"> • Negligible (neighbourhood level) Increase demand for open space and recreation facilities <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) Increase demand for children's play space: <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) Reduced crime levels through increased local activity:	

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
		<ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Employment: Major Beneficial • Productivity: Moderate Beneficial <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> • Employment: Major Beneficial • Productivity: Moderate Beneficial • Population, Labour Force and Skills: Major Beneficial • Business Space and Activity: Moderate Beneficial • Housing: Moderate Beneficial • Income and Expenditure: Major Beneficial • Local Authority Revenue: Major Beneficial • Public Services: Negligible to Minor Adverse 	
<i>ES Chapter 7: Transport and Accessibility</i>			
<p>Since the 2017 EIA, the following new guidance has been published:</p> <ul style="list-style-type: none"> • The TFL published Healthy Streets¹⁰ for London in 2017, which sets out policies and strategies to help Londoners use cars less, and walk, cycle and use public transport more. It 	<p>The traffic and pedestrian surveys for the 2017 EIA was undertaken in May 2016. It is noted that these surveys were undertaken beyond the typical three-year validity period; however, there are several points to acknowledge in considering the validity of the surveys. Firstly, for the June 2018 consented scheme it was</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Severance: Minor Adverse • Driver Delay: Negligible • Pedestrian Delay: Negligible • Fear and Intimidation: Negligible • Pedestrian Amenity: Negligible • Accidents and Safety: Negligible • Driver Stress: Minor Adverse 	<p>As the proposed amendments would result in the introduction of a temporary structure during the demolition and construction stage, there would likely be a very marginal change in construction HGV movements. However, this would not affect the overall scale or nature of demolition and construction effects on the highway network, on the public transport network, on pedestrian movement and cycle movement. Accordingly, the conclusions of the 2017 ES would remain valid.</p> <p>The Transport Assessment Technical Note (presented in Appendix 2) shows that the proposed amendments would</p>

¹⁰ Transport for London (TFL), 2017. Healthy Streets for London. London. TFL.

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
<p>is a long-term plan aimed at improving experiences of London’s streets, and helping people to be more active and enjoy the health benefits of being on London’s streets. TfL also now applies a ‘Vision Zero’ approach to public safety which aims to eliminate all deaths and serious injuries from London’s transport network by 2041. The Healthy Streets and Vision Zero approaches help new developments in London improve air quality, reduce congestion and make the city a greener, healthier and more attractive place to live, work play and do business.</p> <p>The new guidance would not affect the scope or methodology of the transport and accessibility assessment.</p> <p>The proposed amendments and the January 2020 amended proposed development as a whole do not introduce any new</p>	<p>agreed with the LBC and TfL that no growth should be applied to traffic as it was considered unlikely that traffic growth would occur within the study area. Secondly, there have been no significant changes to Juniper Crescent (i.e. no new development or infrastructure, or changes to the Morrisons supermarket) that would impact the level of traffic that travels along access roads. Therefore, it is considered that the surveys remain valid for the updated assessment.</p>	<ul style="list-style-type: none"> • Highway Capacity: Negligible • Public Transport Capacity: Negligible <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> • Severance: Minor Adverse • Driver Delay: Minor Adverse • Pedestrian Delay: Minor Adverse • Fear and Intimidation: Minor Adverse • Pedestrian Amenity: Negligible • Accidents and Safety: Negligible • Driver Stress: Negligible • Highway Capacity: Negligible • Public Transport Capacity: Minor Adverse <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Severance: Minor Adverse • Fear and Intimidation: No cumulative effects <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Severance: Minor Adverse • Fear and Intimidation: No cumulative effects • Accidents and Safety: Negligible 	<p>change the level of operational traffic generated by the temporary store over the extended 50-month period. Based on revised trip generation calculations and taking into account the reduced parking provision at the temporary store, it has been calculated that the latest proposed temporary store would result in the following vehicle trip generation in peak hours on the shared access road during this stage:</p> <ul style="list-style-type: none"> • AM Peak: 32 two-way vehicle movements • PM Peak: 154 two-way vehicle movements • Daily: 1,732 two-way vehicle movements <p>Furthermore, it has been calculated that the latest proposed temporary store would result in the following HGV trip generation in peak hours on the shared access road during this stage:</p> <ul style="list-style-type: none"> • AM Peak: 1 two-way vehicle movements • PM Peak: 0 two-way vehicle movements • Daily: 22 two-way vehicle movements <p>These movements result in a small decrease in the 50-month operational movements of 58 per day when compared to the temporary store proposed as part of the 2018 consented scheme. Furthermore, during the demolition of the PFS and construction of the temporary store, there would be a net overall reduction in all vehicle (PCU) flows of 809 per day compared with baseline traffic conditions, with a minor increase of 12 daily HGVs compared with baseline traffic, noting that there is no increase in HGVs during this phase in comparison with the previously approved scheme. There would also be a reduction against the baseline of 2,334 PCUs during operation of the temporary store and demolition/ construction at the MS parcel.</p>

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
<p>issues for consideration in the updated assessment.</p>			<p>The overall completed development stage quantum and nature of land uses would remain consistent with that previously environmentally assessed for the 2017 EIA, with the overall residential unit numbers, residential floorspace, unit and tenure mix, as well as the overall quantum and type of commercial floorspace remaining unchanged.</p> <p>The operational multi-modal trip generation would therefore remain unchanged and therefore, the conclusions of the 2017 ES.</p> <p>Additional mitigation would not be required.</p> <p>Accordingly, no new or amended significant transport and accessibility effects are likely to arise for the January 2020 amended proposed development.</p> <p>In respect of cumulative effects, the previously reported intra and inter-project effects within the 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended significant transport and accessibility effects have been reported for the January 2020 amended proposed development. In addition, it has been confirmed that no new HS2 information is available in the public domain. The mitigation measures previously offered in working collaboratively with HS2 and other cumulative schemes in the study area to minimise disruption during the demolition and construction stages, remain valid.</p>

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
<i>ES Chapter 8: Air Quality</i>			
<p>Since the 2017 EIA, the following Atmospheric Dispersion Modelling System (ADMS) models¹¹ have been published for use:</p> <ul style="list-style-type: none"> ADMS Roads 4.1. <p>In addition to this, Defra has made the following updates:</p> <ul style="list-style-type: none"> Vehicle emission factors (v9.0); Mapped background concentrations; and NO_x to NO₂ calculator. <p>The updates would not affect the scope or methodology of the air quality assessment.</p> <p>The proposed amendments and the January 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment</p>	<p>It is noted that the most up-to-date air quality monitoring data indicates that baseline concentrations of pollutants in the London Borough of Camden have reduced since 2016. However, high concentrations in excess of objective concentrations are still experienced at locations adjacent to the main road network as is evident from the monitoring data used to verify the model (CA16 and CA23).</p> <p>In respect of traffic flows, the transport consultants have confirmed that the traffic surveys and modelling data previously relied upon remain valid.</p> <p>Therefore, the baseline conditions set out in the 2017 EIA represents a worst case.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Dust emissions (on- and off-site): Negligible Construction transport emissions (on- and off-site): Minor Adverse <p><u>Completed Development</u></p> <ul style="list-style-type: none"> Operational plant emissions (on- and off-site): Negligible Operational transport emissions (on- and off-site): Negligible <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Dust emissions: Not significant <p><u>Completed Development</u></p> <ul style="list-style-type: none"> NO₂: Negligible PM₁₀: Negligible <p><i>Air Quality Neutral</i></p> <p>The 2017 EIA concluded that the June 2017 consented scheme would meet the air quality neutral requirements and no mitigation is required.</p>	<p>The land uses of the January 2020 amended proposed development remains consistent with that previously environmentally assessed for the 2017 EIA.</p> <p>The change in the demolition and construction start date, delivery of a temporary store and extension of the temporary store operation during the demolition and construction stage would not alter the conclusions of the air quality assessment despite the small increase of HGV movements during demolition/construction at the PFS site, when compared with baseline traffic flows.</p> <p>In addition, the transport consultants have confirmed a small decrease in the projected traffic flows during the 50-month operation of the temporary store, compared with the previous assessment that reflected a slightly larger temporary store.</p> <p>Upon completion and operation, there would be no change to the multi-modal trip generation and energy centre emissions.</p> <p>Additional mitigation would not be required.</p> <p>Accordingly, no new or amended significant air quality effects are likely to arise for the January 2020 amended proposed development.</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended significant air quality effects have been reported for the January 2020 amended proposed development.</p>

¹¹ Cambridge Environmental Research Consultants (CERC), 2019. <http://www.cerc.co.uk/environmental-software/ADMS-Roads-model.html>

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
<i>ES Chapter 9: Noise and Vibration</i>			
<p>Since the 2017 EIA the following new guidance has been published:</p> <ul style="list-style-type: none"> The Institute of Acoustics published ProPG¹² in 2017 to encourage sustainable residential development through good acoustic design. BS4142:2014 + A1:2019 Methods for rating and assessing industrial and commercial sound. This update follows feedback from users, revised examples and changes to improve the consistency of assessments. The fundamental guidance and approach remains unchanged. <p>These updates do not affect the scope or methodology of the of the noise and vibration assessment.</p>	<p>There have been no significant developments in the area that would introduce fixed noise sources that would impact on the proposals or the local acoustic environment.</p> <p>Furthermore, the transport consultants have confirmed that there is no anticipated growth in the traffic volumes of the study area. Therefore, the previously provided traffic data remains valid and the associated noise would remain consistent with the 2016 survey results.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Generation of demolition and construction plant noise: Minor Adverse and Negligible Generation of demolition and construction traffic noise: Negligible Generation of demolition and construction vibration: Minor Adverse <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> Effect of existing noise environment on internal residential noise levels: Negligible Effect of existing noise environment on proposed external amenity spaces: Negligible to Moderate Adverse Change in road traffic noise levels: Negligible Generation of plant noise: Negligible Generation of commercial noise: Minor Adverse Effect of existing vibration levels on proposed development: Negligible to Minor Adverse <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Noise from demolition and construction works (nearby sensitive receptors): Minor Adverse 	<p>The land use of the January 2020 amended proposed development remains consistent with that previously environmentally assessed for the 2017 EIA.</p> <p>The change in the demolition and construction start date, delivery of a temporary store and extension of the temporary store operation during the demolition and construction stage would not alter the conclusions of the noise and vibration assessment despite the small increase of HGV movements during demolition/construction at the PFS site, when compared with baseline traffic flows.</p> <p>In addition, the transport consultants have confirmed a small decrease in the projected traffic flows during the 50-month operation of the temporary store, compared with the previous assessment that reflected a slightly larger temporary store.</p> <p>Upon completion and operation, there would be no change to the multi-modal trip generation and energy centre emissions.</p> <p>Additional mitigation would not be required.</p> <p>Accordingly, no new or amended significant noise and vibration effects are likely to arise for the January 2020 amended proposed development.</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended significant noise and vibration effects have been reported for the January 2020 amended proposed development.</p>

¹² Institute of Acoustics, ProPG, 2017, Professional Practice Guidance on Planning & Noise, CIEH

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
<p>The proposed amendments and the January 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment.</p>		<ul style="list-style-type: none"> • Noise from demolition and construction works (all nearby noise sensitive receptors): Negligible Adverse • Vibration from demolition and construction works (on- and off-site receptors): Moderate Adverse • Demolition and construction traffic noise: Negligible • Demolition and construction vibration: Minor Adverse <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> • Noise on internal residential spaces: Negligible • Noise on shared amenity spaces: Negligible to Minor Adverse • Noise on private balconies: Moderate Adverse • Building plant services noise: Negligible • Commercial noise breakout: Negligible • Road traffic: Negligible • Vibration levels on the proposed development: Negligible to Minor Adverse 	

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
<i>ES Chapter 10: Daylight, Sunlight and Overshadowing</i>			
<p>No new or updated Daylight, Sunlight and Overshadowing guidance has been published since the 2017 EIA.</p> <p>The proposed amendments and the January 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment</p>	<p>The built form conditions on-site have remained unchanged from that reported for the 2017 EIA.</p> <p>No new residential uses/ schemes have been constructed or are currently under construction within the study area.</p> <p>Accordingly the baseline conditions as reported in the 2017 ES, remains valid.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> The magnitude of impact and so resultant likely effect in relation to the daylight and sunlight amenity, overshadowing and solar glare for the surrounding properties and amenity areas would vary throughout the demolition and construction stage, depending on the level of obstruction caused. The impact would almost certainly be less than that of the completed proposed development, given that the extent of permanent massing would increase throughout the construction stage, until the buildings are completed. <p><u>Completed Development</u></p> <ul style="list-style-type: none"> Change in Daylight levels: Negligible to minor adverse to 12 properties, minor to moderate adverse to seven properties, Moderate adverse to one property and Moderate to Major Adverse to two properties Changes in Sunlight levels: Negligible to Minor Adverse Change in Overshadowing levels: Minor Adverse Creation of Solar Glare (Train Drivers): Negligible Creation of Solar Glare (Road Users): Negligible 	<p>The introduction of a single storey temporary store (approximately 6.9 m high), would not alter the conclusions of the daylight, sunlight and overshadowing assessment for the demolition and construction stage as presented in the 2017 ES as the overall height and footprint are smaller than that of the proposed office building and would be temporary in nature.</p> <p>The overall massing of the completed and operational scheme would remain consistent with that previously environmentally assessed for the 2017 EIA.</p> <p>Additional mitigation would not be required.</p> <p>Accordingly, no new or amended significant daylights, sunlight and overshadowing effects are likely to arise for the December 2019 amended proposed development.</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended daylight, sunlight and overshadowing have been reported for the January 2020 amended proposed development.</p>

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
		<p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> The construction of the new buildings on the application site would have a gradual effect upon the levels of daylight, sunlight, overshadowing and light pollution as the massing of the proposed development and cumulative schemes increase over time. <p><u>Completed Development</u></p> <p>Daylight to Surrounding Receptors:</p> <ul style="list-style-type: none"> 54-64 Juniper Crescent: Minor Adverse to Moderate Adverse 81 - 84 Juniper Crescent: Moderate Adverse 101 - 103 Juniper Crescent: Moderate Adverse <p>Daylight to Surrounding Consented Residential Receptors:</p> <ul style="list-style-type: none"> 44-44a Gloucester Avenue: Negligible 100 Chalk Farm Road: Minor to Moderate Adverse <p>Sunlight to Surrounding Receptors:</p> <ul style="list-style-type: none"> No cumulative sunlight effects <p>Overshadowing:</p> <ul style="list-style-type: none"> Surrounding Amenity: Minor Adverse Private amenities: Minor Adverse <p>Light Pollution:</p> <ul style="list-style-type: none"> Surrounding sensitive properties: Minor Adverse 	

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
<i>Chapter 11: Wind</i>			
<p>No new or updated wind assessment guidance has been published since the 2017 EIA.</p> <p>The proposed amendments and the January 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment</p>	<p>The built form conditions on-site have remained unchanged from that reported for the 2017 EIA.</p> <p>No new schemes have been constructed or are currently under construction within the study area.</p> <p>Accordingly the baseline conditions as reported in the 2017 ES, remains valid.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Wind conditions suitable for standing and strolling conditions: Negligible <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Wind conditions at bus stop suitable for standing: Negligible to Minor Beneficial • Wind conditions at off-site residential amenity spaces: Negligible • Wind conditions at thoroughfares suitable for strolling: Negligible to Moderate Beneficial • Wind conditions at entrances suitable for entrance use: Negligible to Minor Beneficial • Wind conditions at ground level amenity users suitable for sitting: Negligible • Wind conditions at roof amenity suitable for sitting: Negligible • Wind conditions at balconies suitable for sitting: Negligible <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • The likely effect is judged to be Negligible and wind conditions both on and off-site would remain acceptable for their intended pedestrian uses 	<p>The introduction of a single storey temporary store (approximately 6.9 m high), would not alter the conclusions of the wind assessment for the demolition and construction stage as presented in the 2017 ES as the overall height and footprint are smaller than that of the proposed office building and would be temporary in nature.</p> <p>The overall massing of the completed and operational scheme would remain consistent with that previously environmentally assessed for the 2017 EIA.</p> <p>Additional mitigation would not be required.</p> <p>Accordingly, no new or amended significant wind microclimate effects are likely to arise for the January 2020 amended proposed development.</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended significant wind microclimate effects have been reported for the January 2020 amended proposed development.</p>

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
		<p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> With the implementation of all mitigation measures all adverse effects around the proposed development would reduce to Negligible 	
<p><i>Volume 2A: Townscape and Visual Impact Assessment</i></p>			
<p>No new or updated townscape and visual impact assessment guidance has been published since the 2017 EIA.</p> <p>The proposed amendments and the January 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment</p>	<p>The built form conditions on-site have remained unchanged from that reported for the 2017 EIA.</p> <p>No new schemes have been constructed or are currently under construction within the study area.</p> <p>Accordingly the baseline conditions as reported in the 2017 ES, remains valid.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Views: None to Major Adverse Townscape Character Areas (TCAs): None to Major Adverse <p><u>Completed Development</u></p> <p>Views:</p> <ul style="list-style-type: none"> One Major Beneficial Five Moderate Beneficial One Minor Beneficial One Major Neutral Nine Moderate Neutral 12 Minor Neutral Seven Negligible One Minor Adverse <p>TCAs:</p> <ul style="list-style-type: none"> One Minor Beneficial Four None Five Negligible <p>Summary of Cumulative Effects</p> <ul style="list-style-type: none"> The visual and townscape effects would be neutral or positive in all cases 	<p>The demolition and construction effects are likely to be the same as those presented in the 2017 ES due to the similar nature and degree of works involved.</p> <p>The temporary store would have limited visibility in the wider area, due to its relative height, and would present a continuous built edge to the adjacent main route of Chalk Farm Road. It would have a simple and industrial design character, with dark grey corrugated metalwork and dark grey brick on the side and rear elevations, and high glazing panels at the entrance. An artwork strategy has been developed for the elevation on Chalk Farm Road, which would be secured by means of a planning condition. The east and west elevations will be seen in oblique views moving along Chalk Farm Road. Overall, the building will be little seen within the locality. Any temporary adverse effect on townscape character and views arising from the single storey massing proposed is considered to be minor, due to its restricted extent, and mitigated by the proposed design character, artwork strategy and its temporary nature.</p> <p>The overall massing of the completed and operational scheme would remain consistent with that previously environmentally assessed for the 2017 EIA.</p> <p>Additional mitigation would not be required.</p>

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
			<p>Accordingly, no new or amended significant townscape and visual effects are likely to arise for the January 2020 amended proposed development.</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended significant townscape and visual effects have been reported for the January 2020 amended proposed development.</p>
<p><i>Volume 2B: Built Heritage</i></p>			
<p>Since the 2017 EIA there has been the new guidance published available for use for the assessment methodology:</p> <ul style="list-style-type: none"> Historic England published the Second Edition of 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets' in December 2017¹³. This document replaces the First Edition (published in 2015), as well as 'Seeing the History in the View: A Method for Assessing Heritage Significance within Views' (published 	<p>It is considered that there is no material change to the baseline conditions as described for the wind assessment in the 2017 ES. Therefore, the baseline conditions set out in the 2017 EIA remains valid for this review.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Conservation Areas: Moderate Adverse to Minor Adverse Statutorily listed buildings: Moderate Adverse to Negligible Registered parks and gardens: Moderate Adverse Locally listed buildings: Minor Adverse <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> Conservation areas: one Negligible, one Neutral, one Minor Adverse and one Moderate Adverse. Statutorily listed buildings: 11 Negligible, 20 Neutral and five Minor Adverse Registered parks and gardens: Moderate Adverse 	<p>The single storey temporary store (approximately 6.9 m high) would have limited visibility in the wider area, due to its relative height, and would present a continuous built edge to the adjacent main route of Chalk Farm Road.</p> <p>As noted above, the store would have a simple and industrial design character. An artwork strategy has been developed for the elevation on Chalk Farm Road to minimise temporary impacts on views, townscape and the setting of heritage assets such as the historic boundary wall further south (Grade II* Listed). The east and west elevations will be seen in oblique views moving along Chalk Farm Road.</p> <p>Effects would be minor and limited in extent, mitigated by the proposed design character, artwork strategy and its temporary nature.</p> <p>The overall massing of the completed and operational scheme would remain consistent with that previously environmentally assessed for the 2017 EIA. Additional mitigation would not be required.</p>

¹³ Historic England, 2017. Good Practice Advice Note 3: The Setting of Heritage Assets, December 2017.

Table 3: Environmental Implications of January 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of 2017 ES for June 2018 Consented Scheme	Updated Assessment of January 2020 Amended Proposed Development
<p>in 2011)¹⁴. The Second Edition does not materially change the approach to understanding the significance of the relevant heritage assets, including the contribution made by setting to that significance.</p> <p>The update would not affect the scope or methodology for the built heritage assessment.</p> <p>The proposed amendments and the January 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment</p>		<ul style="list-style-type: none"> Locally listed buildings: 12 Negligible, 12 Neutral and one Minor Beneficial <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> None <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> Neutral 	<p>Accordingly, no new or amended significant built heritage effects are likely to arise for the January 2020 amended proposed development.</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended significant built heritage effects have been reported for the January 2020 amended proposed development.</p>

¹⁴ English Heritage, 2011. Seeing the History in the View: A Method for Assessing Heritage Significance within Views

Cumulative Effects

As there have been no changes to the assessment of effects for each of the technical chapters listed in Table 3, the intra cumulative effects associated with the amended proposed development would remain the same as presented in the 2017 ES.

No new cumulative schemes have come forward since the production of the 2017 ES and applications relating to current cumulative schemes are not material to the conclusions presented within the 2017 ES. Therefore, there would be no changes to the assessment as presented in the 2017 ES.

Residual Effects

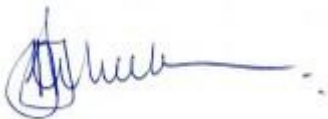
The residual effects, conclusions and summary of the 2017 ES would remain valid for the proposed development. Consequently, no further assessment needs to be undertaken at this stage or additional mitigation measures required.

6. Summary and Conclusion

This S73 application seeks to amend the consented proposals for the PFS parcel of the June 2018 consented scheme. Due to the nature of the January 2020 amended proposed development, it is considered that there would be no material change to the predicted likely significant environmental effects reported in the 2017 ES.

Should you or any of the consultees have any questions for clarification, please do not hesitate to contact Michelle Wheeler at Ramboll.

Yours sincerely

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Encl. Appendix 1, Scoping Opinion Request Letter
 Appendix 2, Transport Assessment Technical Note

Appendix 1

Scoping Opinion Request Letter

Gavin Sexton
Regeneration and Planning
London Borough of Camden
2nd Floor, 5 Pancras Square
Judd Street
London
WC1H 9JE

[sent via email]

Dear Gavin

INFORMAL EIA SCOPING REQUEST: PROPOSED SECTION 73 MINOR MATERIAL AMENDMENT TO PLANNING CONSENT 2017/3847/P FOR CAMDEN GOODS YARD PETROL FILLING STATION PARCEL, CAMDEN

Date 17/10/2019

We write to you on behalf of our client, St George Plc (the 'Applicant') regarding the proposed Minor Material Amendment (MMA) application to be made under section 73 (S73) of The Town and Country Planning Act 1990 in respect of the 'Camden Goods Yard' project located off Chalk Farm Road, adjacent to Juniper Crescent and Gilbeys Yard in Chalk Farm, Camden.

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The proposed S73 MMA application will be submitted in January 2020 (the 'January S73 application') and will seek to amend the full planning consent (planning reference: 2017/3847/P) that was granted in June 2018 (the 'June 2018 Consented Scheme') for the Petrol Filling Station (PFS) parcel of land within the consented scheme (hereafter referred to as the 'PFS Parcel').

Ref L1620008029_2

The June 2018 Consented Scheme was subject to an Environmental Impact Assessment (EIA) which was reported within an Environmental Statement (ES).

The purpose of this letter is to request an informal EIA Scoping Opinion from the London Borough of Camden (LBC) as the "relevant planning authority", on the scope of supplementary environmental information to accompany the January 2020 S73 application.

1. Project Background

In June 2017 a full planning application (ref: 2017/3847/P), was submitted by Safeway Stores Limited and BDW Trading Limited to the LBC for the redevelopment of a 3.26 hectare (ha) site located off Chalk Farm Road, adjacent to Juniper Crescent and Gilbeys Yard in Chalk Farm, Camden (the 'application site') to deliver the following:

Ramboll Environment and Health UK Limited
Registered in England
Company No: 2331163
Registered Office:
240 Blackfriars Road
London
SE1 8NW

- Morrisons Supermarket (MS) Parcel: 573 residential units (60,568 m² gross external area (GEA)); office space (4,867 m² GEA); workshops (779 m² GEA); affordable workspace (565 m² GEA); a Morrisons Supermarket (19,963 m² GEA); retail (787 m² GEA); community centre (86 m² GEA); and an urban farm (1,298 m² GEA); and
- Morrisons Petrol Filling Station (PFS) Parcel: retail (1,627 m² GEA); office (8,114 m² GEA); and winter garden (329 m² GEA).

The June 2018 Consented Scheme was to be delivered over eight blocks, ranging from 5 to 14 storeys.

The application was accompanied by an ES which reported on the outcomes of the EIA undertaken in accordance with the 2011 EIA Regulations (as amended in 2015).

Subsequent to the grant of planning permission, the following applications have been submitted to the LBC between January 2019 and June 2019 for non-material amendments to the June 2018 Consented Scheme:

- 06 February S96A 2019 application to make minor changes to the wording of planning conditions 47, 48 and 49 [2019/0153/P].
- 04 July 2019 S96A application to make minor changes to planning conditions 29, 50 and 60 [2019/2962/P].

Both applications have been granted planning permission. Due to the non-material and insignificant nature of these amendments, the 2017 EIA/ES was not updated. Therefore, this letter continues to refer to the original 2017 EIA/ES, which is considered to remain valid for the June 2018 Consented Scheme.

St George Plc has been selected by Morrisons to deliver the June 2018 Consented Scheme and proposes to make minor amendments to the June 2018 Consented Scheme.

2. Proposed Amendments

The January 2020 S73 application will seek the following proposed amendments (collectively referred to as the 'January 2020 proposed amendments') to the June 2018 Consented Scheme:

- Amend the construction start date for the PFS parcel from Quarter 1 2019 to Quarter 1 2020 and completion from Quarter 3 2020 to Quarter 1 2021;
- Deliver a 14,000 m² temporary store on the PFS parcel in a temporary one storey pre-fabricated building instead of in the final PFS building structure; and
- Extend temporary store operation from 30 to 50 months.

There would be no amendments to the MS parcel or to other elements of the consented scheme such as the ventilation, servicing, drainage, energy, waste and landscaping strategies.

The June 2018 Consented Scheme, as amended by the S73 application, is hereafter referred to as the 'January 2020 amended proposed development'.

3. Proposed Approach

3.1 EIA Regulations

The June 2018 Consented Scheme was scoped and assessed under the 2011 EIA Regulations (as amended in 2015). During the preparation of the 2017 ES, the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the '2017 EIA Regulations') were published.

Part 12, Regulation 76(2a) of the 2017 EIA Regulations sets out transitional arrangements, such that the 2011 EIA Regulations (as amended in 2015) continue to apply where a project has been subject to EIA or has been scoped before the commencement of the 2017 EIA Regulations.

On the assumption that the 2011 EIA Regulations (as amended in 2015) remain valid, the January 2020 proposed amendments will fall under Schedule 2, Regulation 13(a) of the 2011 EIA Regulations (as amended in 2015), which states: *"Any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed"*.

Therefore, appropriate supplemental environmental information has to accompany the S73 application to report on the likelihood for the January 2020 amended proposed development as a whole (not the January 2020 proposed amendments in isolation) to give rise to any new or amended significant environmental effects when compared to the 2017 EIA conclusions.

3.2 Reporting Format for Supplemental Environmental Information

The team of EIA technical specialist that undertook the 2017 EIA have considered the January 2020 proposed amendments and the January 2020 amended proposed development as a whole. They have confirmed there are unlikely to be any new or amended significant environmental effects when compared to the 2017 EIA conclusions.

Accordingly, and to ensure a proportionate approach, we propose to present the results of our updated EIA within an Environmental Implications Letter (EIL). Assessment results will be presented in tabular format and it is anticipated a technical note will be appended to support the conclusions of the transport and accessibility assessment.

This letter seeks the LBC's agreement on the proposed reporting format.

3.3 Scope of Environmental Impacts and Effects

The January 2020 proposed amendments and the 2020 amended proposed development as a whole, would not alter the nature and scale of the June 2018 Consented Scheme and are therefore unlikely to introduce any new potential impacts or likely effects over and above those previously scoped and considered in the 2017 EIA. Accordingly, the scope of the environmental topics previously considered, are considered to remain valid.

The updated EIA would be undertaken in accordance with the 2011 EIA Regulations (as amended in 2015).

The 2017 EIA Regulations introduced additional environmental topics for applicants to consider and assess for qualifying EIA Developments, namely climate change, health, and major accidents and disasters. The January 2020 amended proposed development as a whole is unlikely to give rise to

significant environmental effects in respect of these environmental topics by virtue of its nature, scale, location and design proposals. Appropriate justification will be provided within the EIL to accompany the January 2020 S73 application.

3.4 Proposed Environmental Assessment Scope

The proposed environmental assessment scope for the January 2020 amended proposed development will be based upon the technical scope of the 2017 EIA. The updated EIA will comprise the following:

- review of the 2020 proposed amendments;
- review of validity of the baseline;
- review of relevant legislation, policy and guidance; and
- consideration of an updated list of cumulative schemes.

Table 1 presents a summary of the environmental assessment scope for the January 2020 amended proposed development. It is noted that due to the nature of the proposed amendments, no material changes to the conclusions of following assessments are anticipated (as presented in the order of the 2017 ES chapters):

- Socio-Economics;
- Transport and Accessibility;
- Air Quality;
- Noise and Vibration;
- Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
- Wind;
- Townscape and Visual; and
- Built Heritage.

Table 1: Summary of Environmental Assessment Scope	
Element	Summary Scope of Updates
Baseline	All technical topics will review the current baseline against the baseline that was used for the 2017 EIA. If necessary, technical topics will update the baseline through a desk-top study and/or site survey(s).
Legislation	All technical topics will review any relevant updated, new or emerging legislation and national policy that have arisen since the 2017 EIA and how this may affect the assessment scopes.
Policy	All technical topics will review any relevant updated, new or emerging planning policy that has arisen since the 2017 EIA.
Guidance	All technical topics will review any relevant updated, new or emerging assessment guidance that has arisen since the 2017 EIA.
Assessment Scope	Based on feedback received from EIA technical specialists, no assessments are proposed to be updated given the minor nature and scale of the amendments proposed when considered against the proposed development as a whole.

Table 1: Summary of Environmental Assessment Scope	
Element	Summary Scope of Updates
	However, a technical note relating to the change in traffic flows is proposed to be presented as an appendix to the EIL.
Cumulative Assessments	The planning consultant has confirmed that no new cumulative schemes have come forward since the 2017 EIA; however, the list of cumulative schemes considered within the 2017 EIA will be updated to account for the passing of time and commentary provided on the associated implications for the cumulative assessment.

Therefore, we would be grateful for the LBC’s review of the above proposed scope in Table 1 and any comments you may have in this regard.

We look forward to discussing the above scope with you.

If you require any further information, then please do not hesitate to get in touch.

Yours sincerely



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Appendix 2

Transport Assessment Technical Note

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Date : December 2019
Project : Camden Goods Yard
Project Ref : 196120
Report Title : Transport Technical Note
Report Ref : 196120-02D

DOCUMENT CONTROL

REV	ISSUE PURPOSE	AUTHOR	CHECKED	APPROVED	DATE
-	Client Issue	PR	PR	SJH	11.10.19
A	Revised following Project Team comments	PR	PR	SJH	14.10.19
B	Revised following Project Team comments	PR	PR	SJH	17.10.19
C	Revised to reflect updated scheme	PR	PR	SJH	06.12.19
D	Revised following Project Team comments	ATB	AG	ATB	22.12.19

AG *ATB*

1.0 INTRODUCTION

1.1 This report has been produced by Ardent Consulting Engineers (ACE) in respect of proposals at Camden Goods Yard. It provides an overview of the predicted traffic flows predicted during the various phases of the consented development at the site from initial demolition and throughout the construction/decant process. It is understood that the demolition and construction phases of the development comprise the following with estimated dates in brackets.

- Stage 1 – Existing Morrisons store operates as normal. Demolition of the Petrol Filling Station (PFS) and construction of the temporary Morrisons store. [March 2020 - December 2020, 3 months demolition and 7 months construction]
- Stage 2 – Existing Morrisons store is demolished and the new Morrisons store is constructed. Temporary Morrisons store is in operation. [March 2021 - January 2025, 6 months demolition and 44 months construction]

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- Stage 3 – New Morrisons store is now in operation. Demolition of temporary store and construction of new PFS. [January 2025 – October 2026, 3 months demolition and 18 months construction]
- Stage 4 – All phases completed and fully operational. [March 2027]

1.2 This report seeks to set out the potential traffic generation of each of the stages outlined above and comparing it to the baseline conditions (i.e. existing Morrisons and PFS site operating as normal, and traffic associated with Juniper Crescent).

1.3 As per the submitted Construction Management Plan prepared to support the development at the original application stage, hours of construction will normally be restricted to the following: 08:00-18:00 hours Monday to Friday and 08:00-13:00 hours Saturdays. It is understood that no works will be undertaken on Sundays or Bank Holidays unless made by request only. To relieve road congestion in the local area, where practicable, deliveries be encouraged during the inter-peak period – broadly 10:00-16:00. Hence, it is considered that no construction traffic will be generated within the peak hours.

2.0 TRAFFIC FLOWS

Temporary Food Store

2.1 As part of the June 2018 Consented Scheme, the temporary food store that was proposed included circa 61 car parking spaces and was slightly larger in size (circa 1,450sqm GFA). Since this time, it is now proposed (under S73) that the temporary food store only includes 25 car parking spaces (inc. 2 disabled) and has a smaller gross floor area (1,403sqm GFA). While a new TRICS search could be undertaken for the smaller temporary food store, for the sake of robustness, the same trip rates have been utilised.

2.2 The resulting weekday peak hour trips rates and resulting traffic generation for the 1,403sqm temporary food store are shown in **Table 1** below, with predicted HGV traffic shown in **Table 2** below. The below information was then utilised to predict the traffic flows for Stage 2 (as defined previously).

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Site	Weekday AM Peak (08:00-09:00)			Weekday PM Peak (17:00-18:00)			Weekday 12-hour (07:00-19:00)		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
Vehicle Trip Rates (per 100sqm)	1.467	0.800	-	5.933	5.067	-	61.732	61.733	123.465
Vehicle Trip Generation (1,403sqm GIA)	21	11	32	83	71	154	866	866	1732

Table 1: Temporary Food Store Vehicle Generation

Site	Weekday AM Peak (08:00-09:00)			Weekday PM Peak (17:00-18:00)			Weekday 12-hour (07:00-19:00)		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
HGV Trip Rates (per 100sqm)	0	0.067	-	0.000	0.000	-	0.801	0.801	1.602
HGV Trip Generation (1,403sqm GIA)	0	1	1	0	0	0	11	11	22

Table 2: Temporary Food Store HGV Generation*Predicted Traffic Flows*

2.3 The submitted Construction Management Plan detailed the below predicted construction traffic movements.

Work Stage	Estimated vehicles per day ¹	Estimated vehicles per month ²
Enabling works and demolition	Up to 40	Up to 880
Substructure	Up to 60	Up to 1320
Superstructure	Up to 30	Up to 660
Façade	Up to 15	Up to 330
Fit out works	Up to 20	Up to 440

Figure 1: Predicted Construction Traffic

2.4 Expanding on the information above, it is envisaged that the following types of vehicles should occur as part of the demolition and excavation phases, along with anticipated timescales.

- Initially site set-up deliveries will occur to bring items such as site offices, hoarding, scaffolding and initial plant. This is likely to be undertaken using a large tipper/7.5 tonne lorry type vehicle;
- Demolition plant shall be delivered to the site within the first week. This is likely to be done using a large tipper/7.5 tonne lorry type vehicle;
- It is estimated that delivery vehicles will be required to bring materials and equipment to the site per week, likely in the box vans or rigid trucks;

- It is estimated that vehicles will be required to remove materials from site during the demolition phase. This is likely to be undertaken using skip lorry/small tipper/7.5 tonne rigid truck type vehicles;
- Deliveries of fuel would occur throughout the demolition phase, which would be done using either a small oil tanker or a rigid truck type vehicle (in the event of oil being delivered in barrels instead);
- On completion of demolition, the demolition plant shall be picked up from the site, which is likely comprise up to 5 collections using a small tipper/7.5 tonne lorry type vehicle.

2.5 It is envisaged that the following vehicle types should occur as part of the construction phase.

- The delivery of contractor equipment (generators, storage facilities) would occur within the first two weeks of the phase, and would then be collected at the end of the project, expected to be done using a large tipper/7.5 tonne lorry type vehicle;
- The delivery of concrete (ready mixed /precast blocks) would occur within the first 6 months of the phase. It is estimated that this would be undertaken using a large tipper/concrete mixer/7.5 tonne lorry type vehicle;
- The delivery of aggregates/cement would occur within the first 6 months of the phase using a 7.5 tonne lorry/rigid truck type vehicle.;
- The delivery of steel products (sheet piles/rods etc.) would arrive throughout the contract;
- The delivery of general building materials would occur throughout the contract using a small tipper/7.5 tonne lorry type vehicle;
- Deliveries of fuel would occur throughout the contract using a small oil tanker/rigid truck type vehicle (in the event of barrels);
- Any delivery of a tower crane would be required to arrive at the beginning of the construction phase and depart within the final six months of completion;
- Small routine deliveries (general construction ancillaries/PPE/signs/roadwork equipment etc.) would occur throughout the contract using a transit van.

2.6 The dimensions for all of the vehicles described above are as follows:

Vehicle	Width	Length
Large Tipper	2.5m	10.2m
7.5 tonne lorry	2.3m	7.2m
Rigid truck	2.5m	12.0m
Large mobile crane	2.4m	12.3m
Skip lorry	2.4m	6.3m
Small tipper	2.5m	6.5m
Small oil tanker	2.5m	9.6m
Concrete mixer	2.4m	8.4m
Transit Van	2.0m	5.3m

2.7 At this stage it is important to note that the current site attracts movements from maximum legal articulated vehicles (Width: 2.5m, Length: 16.5m). The information above predicts that the most onerous anticipated vehicle associated with the works is a large mobile crane (Width: 2.4m, Length: 12.3m). Given that the existing use generates larger movements than those predicted for the demolition/construction works, it is therefore considered that the local highway network can accommodate the predicted construction traffic turning movements.

2.8 Utilising the above information, the following assumptions have been made to apply it to the stage outlined in **Section 1.0**.

Stage	Max. Predicted Daily Movements	Notes
1	60	Maximum of 60 daily two-way movements at PFS site relating to Substructure works (12 months)
2	60	Maximum of 60 two-way movements at main site relating to Substructure works. (36 months)
3	60	Maximum of 60 two-way movements at PFS site relating to Substructure works. (12 months)
4	0	Fully operational site, so no construction traffic predicted.

Table 3: Predicted Two-Way Construction Traffic

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2.9 Based on the above information, it is predicted that the following typical distribution of vehicle types are generated for each stage.

Vehicle	Percentage Split	No. of Daily Movements
Large Tipper	30%	18
7.5 tonne lorry	25%	15
Rigid truck	10%	6
Large mobile crane	0%	0
Skip lorry	2%	1
Small tipper	5%	3
Small oil tanker	1%	1
Concrete mixer	2%	1
Transit Van	25%	15
Total	100.0%	60

2.10 The tables below provide details of the predicted traffic generated for Passenger Car Units (PCUs) and HGVs at each stage compared to the baseline (i.e. what currently exists on the local highway network). One car or LGV equates to one PCU, while one HGV equates to two PCUs. For robustness, it has been assumed that all construction traffic will be HGVs.

Link	Baseline			Stage 1					
	Two-Way Flow			Two-Way Flow			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Morrisons Main Store	161	351	3257	161	351	3257	0	0	0
PFS	178	192	929	0	0	0	-178	-192	-929
Temporary Store	0	0	0	0	0	0	0	0	0
Proposed Main Site	0	0	0	0	0	0	0	0	0
Construction Traffic*	0	0	0	0	0	120	0	0	120
HS2	0	0	420	0	0	420	0	0	0
Juniper Crescent	170	94	1051	170	94	1051	0	0	0
Total	509	637	5657	331	445	4848	-178	-192	-809

*Construction traffic predicted to occur in peak hours as per submitted Construction Management Plan

Table 4: Net Change in PCU Movements (Stage 1)

Link	Baseline			Stage 1					
	Two-Way Flow			Two-Way Flow			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Morrisons	34	28	259	34	28	259	0	0	0
PFS	9	5	48	0	0	0	-9	-5	-48
Temporary Store	0	0	0	0	0	0	0	0	0
Proposed Main Site	0	0	0	0	0	0	0	0	0
Construction Traffic*	0	0	0	0	0	60	0	0	60
HS2	0	0	210	0	0	210	0	0	0
Juniper Crescent	2	0	12	2	0	12	0	0	0
Total	45	33	529	36	28	541	-9	-5	12

*Construction traffic predicted to occur in peak hours as per submitted Construction Management Plan

Table 5: Net Change in HGV Movements (Stage 1)

Link	Baseline			Stage 2					
	Two-Way Flow			Two-Way Flow			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Morrisons	161	351	3257	0	0	0	-161	-351	-3257
PFS	178	192	929	0	0	0	-178	-192	-929
Temporary Store	0	0	0	32	154	1732	32	154	1732
Proposed Main Site	0	0	0	0	0	0	0	0	0
Construction Traffic*	0	0	0	0	0	120	0	0	120
HS2	0	0	420	0	0	420	0	0	0
Juniper Crescent	170	94	1051	170	94	1051	0	0	0
Total	509	637	5657	202	248	3323	-307	-389	-2334

*Construction traffic predicted to occur in peak hours as per submitted Construction Management Plan

Table 6: Net Change in PCU Movements (Stage 2)

Link	Baseline			Stage 2					
	Two-Way Flow			Two-Way Flow			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Morrisons	34	28	259	0	0	0	-34	-28	-259
PFS	9	5	48	0	0	0	-9	-5	-48
Temporary Store	0	0	0	1	0	12	1	0	12
Proposed Main Site	0	0	0	0	0	0	0	0	0
Construction Traffic*	0	0	0	0	0	60	0	0	60
HS2	0	0	210	0	0	210	0	0	0
Juniper Crescent	2	0	12	2	0	12	0	0	0
Total	45	33	529	3	0	294	-42	-33	-235

*Construction traffic predicted to occur in peak hours as per submitted Construction Management Plan

Table 7: Net Change in HGV Movements (Stage 2)

Link	Baseline			Stage 3					
	Two-Way Flow			Two-Way Flow			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Morrisons	161	351	3257	161	351	3257	0	0	0
PFS	178	192	929	0	0	0	-178	-192	-929
Temporary Store	0	0	0	0	0	0	0	0	0
Proposed Main Site	0	0	0	9	8	79	9	8	79
Construction Traffic*	0	0	0	0	0	120	0	0	120
HS2	0	0	420	0	0	420	0	0	0
Juniper Crescent	170	94	1051	170	94	1051	0	0	0
Total	509	637	5657	340	453	4927	-169	-184	-730

*Construction traffic predicted to occur in peak hours as per submitted Construction Management Plan

Table 8: Net Change in PCU Movements (Stage 3)

Link	Baseline			Stage 3					
	Two-Way Flow			Two-Way Flow			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Morrisons	34	28	259	34	28	259	0	0	0
PFS	9	5	48	0	0	0	-9	-5	-48
Temporary Store	0	0	0	0	0	0	0	0	0
Proposed Main Site	0	0	0	0	0	0	0	0	0
Construction Traffic*	0	0	0	0	0	60	0	0	60
HS2	0	0	210	0	0	210	0	0	0
Juniper Crescent	2	0	12	2	0	12	0	0	0
Total	45	33	529	36	28	541	-9	-5	12

*Construction traffic predicted to occur in peak hours as per submitted Construction Management Plan

Table 9: Net Change in HGV Movements (Stage 3)

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Link	Baseline			Stage 4					
	Two-Way Flow			Two-Way Flow			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Morrisons	161	351	3257	161	351	3257	0	0	0
PFS	178	192	929	178	192	929	0	0	0
Temporary Store	0	0	0	0	0	0	0	0	0
Proposed Main Site	0	0	0	9	8	79	9	8	79
Construction Traffic*	0	0	420	0	0	420	0	0	0
HS2	0	0	420	0	0	420	0	0	0
Juniper Crescent	170	94	1051	170	94	1051	0	0	0
Total	509	637	6077	518	645	6156	9	8	79

*Construction traffic predicted to occur in peak hours as per submitted Construction Management Plan

Table 10: Net Change in PCU Movements (Stage 4)

Link	Baseline			Stage 4					
	Two-Way Flow			Two-Way Flow			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Morrisons	34	28	259	34	28	259	0	0	0
PFS	9	5	48	9	5	48	0	0	0
Temporary Store	0	0	0	0	0	0	0	0	0
Proposed Main Site	0	0	0	0	0	0	0	0	0
Construction Traffic*	0	0	0	0	0	0	0	0	0
HS2	0	0	210	0	0	210	0	0	0
Juniper Crescent	2	0	12	2	0	12	0	0	0
Total	45	33	529	45	33	529	0	0	0

*Construction traffic predicted to occur in peak hours as per submitted Construction Management Plan

Table 11: Net Change in HGV Movements (Stage 4)

- 2.11 As shown in the tables above, there is predicted to be a net reduction in PCU movements across Stages 1 to 3, and then a negligible increase once the completed development is in place.
- 2.12 In terms of HGV movement, it is predicted that there will be a decrease across Stage 2, and a zero net change once the development is in place. There is predicted to be an increase at Stages 1 and 3; however, this is a maximum increase of 12 HGV movements across the day. Hence, it is considered that this would not have any material impact on the operation of the highway network, considering also that it is predicted that there will be a net reduction in PCUs.