

TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESMENT)(ENGLAND & WALES) REGULATIONS 1999

REGULATION 19 - SCHEDULE OF FURTHER INFORMATION REQUIRED

BROADWATER ROAD WEST ENVIRONMENTAL STATEMENT, SEPTEMBER 2010

Re-issued Version 2

Response to Schedule

1. Description of the development

1.1 Confirmation is needed as to the description of the development which has been adopted as the basis for the Environmental Impact Assessment, as:-

- i. The parameters plans are not expressed to be part of the Environmental Statement (ES), and those that are included within the ES are incomplete, superseded and too small to be legible. The full set of parameters plans provided with the application should be submitted at a legible size and either contained within the ES or expressed to be a further volume of the ES.

We have issued a further volume of the ES (Part D) which contains the parameter plans, drawing and figures in A3 format.

- ii. The description of the development is incomplete at section 2.1 of the Environmental Statement. There are anomalies in the description of the development as set out in different sections of the ES, including the NTS and under different topic areas (for example the floor area of the Tesco store, the area and quantum / mix of different sizes of the residential units, the definition of the extra care home / sheltered accommodation, and the number of car and cycle spaces to be provided). The floor area of development also does not appear to match that stated on the application forms. The description of the development should be clearly re-stated in terms of the floor areas and number and type of residential units within each plot or block which have been used as the basis of the Environmental Impact Assessment.

2.1 is now a full standalone description of the scheme and the area and quantum/mix is clearly expressed

2.1.1 Overview

2.1.2 Design Development

2.1.3 The Former Production Hall / Office Building (Plot C)

2.1.4 New Retail Food Store

2.1.5 Offices (Plot F)

2.1.6 Residential and Retail Plot K

2.1.7 Leisure Centre.

2.1.8 Café (Silo Ground floor, Plot E)

2.1.9 Public Space

2.1.10 New Civic Square

2.1.11 Energy Centre

- 2.1.12 Railway Bridge*
- 2.1.13 Community Centre*
- 2.1.14 Residential*
- 2.1.15 Access and Parking*
- 2.1.16 Highways / Streets*
- 2.1.17 Building Heights*
- 2.1.18 Site Levels*

Confirmation should be provided as to whether the quantum of development has been adopted as the basis of all the topic area impact assessments contained within the Environmental Statement, in particular the Transportation Assessment. Cross reference should be made to the relevant parameter plans.

Section 2.2 now contains references to the detailed and outline applications, tables of the areas, and use classification and cross references the parameter plans and figures.

*Confirmation is given that the topic impact assessments contained in the assessment refer to the quantum of development described. Exceptions are:
Transport assessment refers to a slightly worse case as is described in the TA, as does the appendix to drainage assessment. (Part C Appendix B10 Appendix 2.) However the updated drainage assessment refers back to the current scheme parameters.*

- iii. The basis of floor area measurements in the ES should be confirmed. The use of 'approximate' is not appropriate but floor areas could instead be quoted as anticipated maxima qualified by 'up to', provided these figures have been used as the basis of the EIA.

Floor areas are now described as Net Internal Area Gross External Area or "upto" for the outline application indicative scheme descriptions.

- iv. The site area should be confirmed in the ES. At 1.1.1 there is a query remaining in square brackets.

The site is confirmed in the ES at section 2.1.1

- v. The description of the development should contain enough information to convey the nature of the development and its appearance without cross reference to planning documents which do not form part of the Environmental Statement.

The ES now only cross references document expressed as part of the ES

- vi. The description of the development should confirm which existing buildings are to be retained and which are to be demolished with reference to a suitable plan.

The description of the Application in section 2.2 confirms which buildings are to be retained and which are to be demolished and refers to drawings presented in the ES as Part D.

- vii. The Transport Assessment, at section 1.3 states that Broadwater Road is to be widened by taking land from within the site. This is not mentioned in ES at section 2.1 despite being a major issue in setting the scene for the development and assessment of impacts. This should be confirmed in the description of the development.

This is confirmed within the scheme description at Section 2.1.16

- viii. The applicant should confirm whether any renewable energy sources are to be included within the development. If these are proposed for the part of the development subject to the detailed planning application, then an assessment of their environmental impacts, including visual impact, is required.

The Description of the proposed energy centre is given within the scheme description at section 2.1.11, where it is confirmed that for the detailed application gas-fired CHP will be used. The energy centre is also proposed to feed the outline part of the application, but in addition solar thermal and photo-voltaic cells may be used. The environmental impacts of the energy centre are fully assessed.

- ix. Confirmation is required of the required relocation of any existing services crossing the site, which may lead to on or off site environmental impacts.

A diversions report has been provided at Part C Appendix B14, which shows all the diversions required. In addition those which may lead to on or off site environmental impacts have been assessed and are considered in Part B Chapter 5 Construction Impacts section 5.2.5

- x. Confirmation needed of the proposed location of waste stores / recycling centre to serve the blocks within the detailed planning application.

The waste stores are described in Part B Chapter, Section 2.10.2 while a drawing of the waste store is provided at Part D 568_07_127.

- 1.2 The need for a robust master plan, description of development and level of detail required was established in the case of R vs. Rochdale Metropolitan Borough Council ex parte Tew, Milne and Garner, 1999. In the case of Berkeley v SSETR, 2000, it was held that the Environmental Statement should be 'a single and accessible compilation'. To make clear the description of the development, plans and reports that are to be read in conjunction with the Environmental Statement should therefore be contained within it. Other documents which have been submitted within the application pack but should form part of the Environmental Statement to avoid a 'Berkeley' situation are:-

- Townscape and Visual Impact Assessment
- PPS5 Statement

All documents referred to in the ES are expressed as part of the ES. The Townscape and Visual Impact Assessment and PPS5 Assessment are included. In addition to provide a single and accessible compilation a overview contents list has been provided , with extensive cross referencing within the ES itself.

2. CHP unit

- 2.1 Confirmation is needed on the fuel type proposed for the CHP, and whether or not the CHP will serve the whole development. Confirmation is also needed as to whether the existing building and stack proposed to be re-used for this purpose will be adequate to house all of the plant required. Confirmation should be provided of the air quality, noise and visual impacts that will result from the CHP, as nearby residential units and other uses which may be adversely affected by the CHP lie within the area of the detailed application.

The energy strategy and statement (Part C Appendix C) has been updated in conjunction with the scheme description to make it clear that the existing boiler house is to be used to house the energy centre for both detailed and outline application

areas, and that the existing stack will be re-used, to incorporate new internal gas flues for the gas-fired CHP plant. The energy centre is fully considered the environmental topic impact assessments

- 2.2 The scheme drawings appear to show a CHP within the Tesco store. Clarification should be provided of the CHP proposals for the development.

This was an oversight in the planning drawing the CHP unit will be removed. Confirmation is given that the Retail Store will be fed from the energy centre.

3. Construction impacts

- 3.1 There is no assessment of impacts that would arise during the construction period and no confirmation or commitment to mitigation measures. These should be provided, and should include, but not necessarily be limited to, traffic, noise and vibration, air quality and visual impacts.

Part B Chapter 5 has been re-written to present both a description of the construction, and present an assessment of the impacts that would arise in the construction phase.

The re-write of the chapter now includes a description of the impacts and commitment to mitigation measures and an assessment of residual impacts. The chapter is supported by

- a) a re-written Construction Code of Practice which is a mandatory document for the principal contractor detailing the mandatory requirements for the construction phase.*
- b) A construction statement (Part C Appendix B14) which describes the employment, plant and traffic requirements for construction.*

Each environmental topic assessment has explicitly considered and assessed construction impacts

4. Microclimate

- 4.1 Confirmation should be provided that appropriate daylight / sunlight levels can be provided to the southern part of the development covered by the outline application given the footprint and quantum of development proposed.

Part C B13 micro-climate has been updated with a daylight sunlight assessment for the outline application section of the development.

5. Socio economic

- 5.1 Confirmation is needed as to whether the development meets the NPFA standard as identified in the SPD (see section 6.1.1 of the ES), and also the Fields in Trust standard and the Welwyn Hatfield Borough standard (see Recreation and Amenity section).

Confirmation is given that the development meets the NPFA standard together with an assessment of the Part C B7 Recreation and Amenity has been updated with this assessment.

- 5.2 The following have not been provided, and are required:-

- i. Assessment of employment creation in the construction and operational periods.

Assessments of employment in both construction and operational phases is provided.

- ii. A review of the existing provision of school places, assessment of the need for school places that would be generated by the proposed development, and identification of any resultant shortfall in education provision resulting from the development.

The socio-economic assessment Part C Appendix B6 .1 has been updated to assess both need and provision and is summarised in Part B Chapter 6 – Permanent Impacts.

- iii. A review of the existing provision of primary health care facilities and assessment of the need for primary health care facilities that would be generated by the development. Confirmation that the doctors surgery proposed to be provided is adequate to meet the need generated by the development.

The socio-economic assessment Part C Appendix B6 .1 has been updated to assess both need and provision of primary health care and is summarised in Part B Chapter 6 – Permanent Impacts.

6. Residential impacts

- 6.1 An assessment is required of the impact of the development on local residents, in terms of any visual, noise, air quality, traffic impacts etc. It is unclear whether local residents have been considered as possible receptors of environmental impact.

A statement of the local which residents have been considered has been given in Chapter 2, and each topic considered effects on possible receptors. In addition a summary of the effects of construction impacts on residents is presented in Chapter 5, while a section on the permanent impact on residents is presented in Chapter 6.

7. Accessibility and Traffic Impacts - TIM TO COMPLETE

- 7.1 Confirmation is needed from the County Highway Authority that they are content with the scope of the traffic modelling undertaken, in terms of its geographic scope, junctions affected, and the assumptions made in respect of the model. Advice to date from the County Highway Authority is to the effect that the figures in Table 6.11 for the traffic modelling scheme are not the same as the agreed figures that were fed into the Paramics modelling therefore it cannot be confirmed that modelling is a worst case assumption at this point in time.

The scope of traffic modelling work was agreed with Hertfordshire Highways (HH), who have been consulted with throughout the modelling process and preparation of the Transport Assessment report. The geographic scope, junctions affected and assumptions made in the modelling were all agreed with HH prior to the modelling work being undertaken. The development generated traffic flows used in the PARAMICS modelling were those that were agreed with HH and represent a worst-case scenario. Additional TRANSYT modelling work of the critical Broadwater Road/Bridge Road junction is currently being finalised with HH. Further modelling of a 2021 year scenario will also be undertaken with HH. HH have confirmed that this should not affect the Masterplan layout or quantum of development.

- 7.2 Mitigation measures required in respect of the surrounding highway network need to be confirmed. At present the proposal to give consideration to 'future highways upgrades' based

on continued monitoring of traffic levels in the town is thought too vague to be enforceable by condition or a section 106 agreement.

The mitigation measures detailed in the TA report relating to the surrounding highway network were based on recommendations made by HH's transport consultants (MVA) in their PARAMICS strategic traffic modelling report. The TA report has been updated to confirm that the developer will make a contribution towards the cost of implementing these improvements. The costing of these improvements is currently being undertaken and will form the basis for agreeing the developer contribution with HH as part of the S106 conditions.

- 7.3 The proposed highway layout is subject to a Stage 1 Road Safety Audit by the county highway authority, which will be submitted subsequent to the application. The County Highway Authority should confirm whether this might lead to changes in the master plan or quantum of development.

An Interim Road Safety Audit was published following the submission of the application. This has now been reviewed with HH and they have confirmed that any changes to the highway design required as a result of the audit will not affect the Masterplan layout or quantum of development. A Designer's Response to the audit is currently being produced and any changes to the highway layout will be agreed separately with HH.

- 7.4 Confirmation is required of the status of the Pall Mall site and whether this was occupied at the time of the traffic surveys in 2007. Confirmation is required as to whether the proposed junction designs will be adequate to serve the Pall Mall development.

The Pall Mall site is not currently in use. The potential impact of the Pall Mall site on the total number of trips generated by the SPD site has been assessed separately and presented to HH and WHBC. This has considered both the existing land use (distribution warehouse) and the SPD compliant area schedule and mix of uses (office and residential). The assessment has been incorporated into the Trip Generation section of the updated TA report.

- 7.5 Need to confirm with the County Highway Authority that they are content for the provision of bus services / contribution to their provision to be subject to discussion and that this can be covered by planning conditions / s 106 agreement, as no definite proposals have been put forward.

Consultation with HH and the local bus operators to agree improvements to services in the vicinity of the site is currently underway and will form the basis of any planning conditions/S106 agreement relating to public transport improvements. HH have confirmed that they are satisfied with this approach.

- 7.6 Confirmation is required that the traffic modelling is based on the finalised description of the development with regards to assessment of impact.

The traffic modelling has been based on the 'worst-case' scheme envisaged at the time of modelling. The final Masterplan scheme as set out in the application has a lower quantum of development than this 'worst-case' scenario. The assessment should therefore be considered robust.

- 7.7 Confirmation should be provided that the MVM results of PARAMICS modelling are not 'Draft' as stated.

The MVA PARAMICS report contains the final modelling results and is not 'draft'.

- 7.8 Construction traffic figures should be provided, together with an assessment of construction traffic impacts.

Construction traffic figures are provided together with an assessment of construction traffic impacts. The results of this assessment have been presented to HH /WHBC and included as an additional section in the updated TA report.

- 7.9 Confirmation should be sought from the County Highway Authority that they are content with the proposed internal road layout as it is understood that reservations were expressed at the quantum of development to be served by the internal spine road accessed from the southern junction and that a request had been made that the internal road layout should allow for all internal routes to be connected such that alternative access routes from the site were available should one become blocked.

The internal road layout includes an emergency access route linking the Boulevard (Spine Road) with the Northern Access Road via the Leisure Centre car park. This provides an alternative access route to the southern part of the development should the southern site access become temporarily blocked. HH have been made aware of this feature and are content with the layout.

8. Noise impacts

- 8.1 An assessment of construction noise, including construction traffic noise should be provided, including an assessment of impact to nearby residential and other sensitive receptors.

A new assessment of construction noise has been commissioned and included to take account of the anticipated traffic and construction activities. The Technical Report is included in Part C Appendix B6.

- 8.2 Whilst the Council's Environmental Health officer is content with the approach to the assessment of noise impacts during the operational period, the scheme design has been changed since the assessment was prepared, both in respect of the layout of proposed blocks and the turning movements permitted from the Tesco servicing yard onto / from Bridge Road. The assessment should therefore be updated to reflect the submitted scheme.

The noise assessment has re-visited the scheme to take account of the scheme design changes. No change in impact is anticipated. – The revised noise assessment is present at Part C Appendix B6

- 8.3 The noise report in the Appendix provides no detailed impact assessment provided for plant noise, but limiting noise criteria have been set for proposed plant. Given that this is a part of the detailed planning application further assessment of the impact of plant noise is required.

The noise assessment has been re-done with a more detailed and realistic definition of plant and the implications for sensitive noise receptors both on –site and off-site assessed.

- 8.4 Confirmation should be obtained that the noise impact assessments, including the PPG24 assessment and the impact of noise from the store servicing area take account of proposed traffic generated by the development.

The existing PPG24 assessment has been re-done to take account of the existing noise climate, the site was remodelled and these traffic impacts are included.

- 8.5 Confirmation should be provided of any potential noise impacts to residents in the surrounding area during the operational period of the development.

Residents have been taken into account in the new noise assessment, both on-the site, in neighbouring developments and across a wider area

9. Air quality

- 9.1 Confirmation is required as to any potential air quality impacts on the wider area, beyond Broadwater Road and Bridge Road.

Potential air quality impacts away from the direct vicinity of the proposal are likely to be lower than those assessed around the site since changes in traffic flows will be less than at the roads adjacent to the proposal. The assessment is that increases in NO2 levels will be small to imperceptible and that the impacts will be negligible.

- 9.2 The predictions in respect of Air Quality are based on the Design Manual for Roads and Bridges. The Council's EHO officer has advised that full details of the inputs to the model should be provided. Local Air Quality Management Technical Guidance LAQM.TG(09) Section 6.32 requires that such models are verified by comparison between predicted and measured concentrations. The closest passive NO2 sampling site operated by the Local Authority is in Parkway, Welwyn Garden City TL236131 which is not representative of the area under consideration. Details of a verification study should be agreed before any work is undertaken.

The model inputs are now provided.

Section 6.32 of Defra's LAQM.TG(09) document does give guidance (to local authorities) on the need for model verification when carrying out a Detailed Assessment of air quality. None of Welwyn Hatfield BC's previous air quality review and assessment work, including 2009, 2006 and 2003 Updating and Screening Assessments, has identified a need to proceed to a Detailed Assessment within the Council's area.

Section 6.32 of Defra's LAQM.TG(09) guidance does not apply to the assessment of air quality impacts arising from development proposals. We have used DMRB which is fit for purpose and well validated for the assessment of impacts arising from development proposals such as these.

In addition monitoring data within the borough have been reviewed and reported in the air quality assessment and found to be well below air quality objectives.

A sensitivity analysis was undertaken in section 6.1 of the air quality assessment, where background concentrations in 2016 were assumed to be the same as 2009 concentrations at the Council's continuous monitoring station (this is likely to be a pessimistic assumption). The sensitivity analysis showed that the maximum predicted NO2 would still be well below the annual objective level.

Discussion with WHBC EHO have been undertaken and the potential for dealing with concerns by means of a condition explored. At this stage the AQ has not been remodelled.

10. Surface and Ground Water Impacts

- 10.1 Confirmation is needed of surface water run off from the site and how the risk of flooding from storm water run off will be mitigated. The water and drainage strategy presents a discussion of SUDs design options. The ES should identify the adopted solution and explain its design, whether and how it can be accommodated on site given the footprint of development proposed, and any impacts arising. Recommendations for mitigation measures in the ES are at present open ended and not confirmed. Confirmation of agreed discharge rates with the Environment Agency is also required.

The ES now confirms that surface water run-off is limited to green field rates and an indicative SUDS solution for both detailed and outline applications has been provided. This identifies the adopted solution (subject to detailed design) and shows how this can be accommodated on the site. The recommendations are strengthened and commitment mitigation and achieving performance levels is given.

- 10.2 The ES states that there is a risk of flooding from sewers, which are already at capacity, but no design of mitigation measures that would alleviate this risk is provided. The ES indicates that further flow monitoring by Thames Water is required before this issue can be properly addressed. The 4th paragraph under 5.2.4 of the Water and Drainage Strategy has a question mark which indicates uncertainty / incomplete text. Confirmation is required of the size and location of the holding tank and any pumping facilities, given the footprint of the development proposed, and any associated environmental impacts (such as noise and odour).

The Water and Drainage Strategy has been re-visited and re-written. The flood risk has been re-assessed and the adopted surface and foul waters solutions described. The detention tanks have been sized and allocated to the various phases The specification of tank performance has been described.

- 10.3 Confirmation is needed of the location of the existing Three Valleys live water main which crosses the site and whether this will pose a constraint to development.

An assessment of the Three Valleys water main has been undertaken and the preferred diversion option identified. An assessment of the implications of this has been presented in Part B Chapter 5 Construction Impacts

- 10.4 Appendix A to the Water and Drainage Strategy and Appendices A to G inclusive of the Drainage Appraisal Report should be provided.

The appendices are included in the re-issue

11. Heritage and archaeology

- 11.1 Assessment of impact to the setting of the Grade II listed Roche building which adjoins the site to the south should be provided.

This is assessed in the Townscape and Visual Impact Assessment (now expressed as part of the ES at Part C Appendix B12.

The brownfield land on Site presently contributes negatively to the setting of the Listed Building. Designs for the residences at the southern end of the Site are submitted in outline. The massing has been arranged so as to step down in height towards the Roche products factory and routes have been arranged to connect the buildings and spaces on Site visually and spatially to the Listed Building, enhancing its setting.

- 11.2 English Heritage have advised that the information provided does not allow detailed assessment of the works to the historic buildings that are to be retained. Although the drawings are generously annotated explanatory material should be provided to justify proposed changes (e.g. windows are to be replaced but no account is given as to whether these are original or otherwise of interest or as to why they are to be replaced. Given the complexity of the works a brief statement on each alteration would be helpful (please note the council is still awaiting detailed comments from English Heritage which may elaborate on this point further).

Part B Chapter 2 has been expanded to describe the work proposed to the historic buildings. In addition a detailed schedule of works has been prepared and is presented as an additional appendix to Part C B16 together with a number of drawings

- 11.3 HER Summary and OASIS forms should also be provided in respect of Archaeology.

The HER and OASIS forms are provided together with an updated Archaeological Impact Assessment at Part C Appendix B2.

12. Ecology

- 12.1 The text of the assessment seems to indicate that the assessment of baseline conditions is incomplete. Notwithstanding the consultation response from Natural England dated 14 October 2010, the report as submitted is very basic and lacks detail, particularly specific species surveys. The Hertfordshire Biological Records Centre (HBRC) have commented that the data collected is already 16 months old and will be considered too old if there are protected species issues to be mitigated for in the proposed development. A full list of species and Phase 1 Habitat Map with Target notes should be provided, together with a report of the bat survey which has already been carried out. The Phase 1 Habitat Map should also show the extent of any Japanese Knotweed infestation.

The ecological report has been updated and re-submitted and provides more details of the various surveys undertaken. A full list of species and a Phase 1 Habitat Map have been provided, together with Target Notes.

The full report of the Bat survey is appended and the Phase 1 Habitat Map shows the extent of the Japanese Knotweed infestation.

- 12.2 The results of the bat survey which has already been carried out should be provided and HBRC advise that a full reptile survey should be carried out.

The bat survey is provided and proposals for the reptile survey, with commitment to mitigation measures has been provided

- 12.3 A statement at section 7.2 of the assessment indicates that plant communities on the site may provide habitats for numerous species of insects, but no invertebrate survey has been provided. A suitable invertebrate survey should be provided.

An invertebrate survey is proposed to gather with a the measure planned to enhance number and range of invertebrates on the site.

- 12.4 Confirmation should be provided of ecological mitigation measures and measures to enhance the site for biodiversity which have been identified and carried forward into the design of the scheme, including the landscape proposals. The consultation response from HBRC dated 1 December should be referred to in this respect.

The Biodiversity management plan has been appended to the ecological assessment. This describes the proposed planting schemes, and biodiversity enhancements, together with commitment to mitigation measures

13. Tree survey

- 13.1 The tree survey which has been omitted from Part C Appendix B3 should be provided. This should include a plan showing the locations of trees to be retained and removed as part of the proposed development.

The tree survey is appended to the ecology statement together with the tree removal and tree planting plans

14. Geotechnical and remediation

- 14.1 The ES notes that there has been contamination on the Polycell site and remediation of polluted ground water will continue by 'pump and treat' until early 2011. Ground water monitoring is continuing and is proposed to continue quarterly for a further 4 years and bi-annually for a further 2 years. The report (dated September 2010) records that the last ground water monitoring took place in September 2009. Confirmation is needed of monitoring undertaken between Sept 2009 and Sept 2010.

The geotechnical report is updated and re-issued

- 14.2 The Council's EHO and the Environment Agency need to be satisfied that the situation regarding contamination can be covered by suitable planning conditions, as the investigations across the entire application site are not yet complete.

A more detailed construction method statement is now included together with the updated geotechnical assessment will allow drafting of suitable planning conditions

- 14.3 Confirmation should be provided as to whether there has been a baseline assessment of the likelihood of asbestos in the Shredded Wheat complex - a building where significant amount demolition is proposed. The impact of asbestos removal during demolition and construction should be assessed. (please refer to paragraph 3.1 above).

An asbestos statement has been provided together with references to the asbestos surveys and asbestos risk registers. In addition the Construction Code of Practice has been updated to explicitly include measure to deal with any residual asbestos on site.

15. Townscape and Visual Impact Assessment

- 15.1 Confirmation should be provided why, at Table 1-1, the definition of the impact assessment criteria includes the existing site.

The TVI has been updated to address.

15.2 The townscape / visual context of the surrounding area should be confirmed.

The updated TVIA now addresses townscape visual context

15.3 The assessment has been conducted with reference to 12 no views from and within the site itself. Views experienced by other receptors / from other viewpoints have not been mentioned, for example views for local residents in Peartree and other areas, views for users / employees within commercial premises in Broadwater Road, views from the railway. Presumably agreement of the photomontage views with WHBC was not intended to exclude consideration of other visual impacts that might arise. Confirmation should be provided of any other visual impacts that will arise as a result of the development which are not already identified in the TVIA.

The views have been were selected from all directions towards the site, to enable a comprehensive assessment of the proposals, in the round and in relation to all sensitive aspects of the townscape. There are no views from further a field, such as Peartree, because the proposals will not be seen from this distance. The TVIA includes 4 views along Broadwater Road. All viewpoints are from within frequented, public space and do not relate to specific viewers or views from within private property, as per industry standard methodology.

16. Sustainability Statement

16.1 Appendix A, the response to the WHBC Sustainability checklist indicates a range of mitigation measures to be implemented but the detail of these is not confirmed in the design or in the ES, e.g. noise suppressing enclosures, lighting schemes designed to prevent light pollution, stack filtering of plant emissions, attenuation measures to water and sewerage systems, water efficient features and rainwater storage and re-use will be implemented 'where appropriate'. Confirmation is required of the mitigation measures that will be incorporated in the development.

Appendix A has been updated to make the developers commitments explicit, together with the proposed mandatory objectives and targets that will be adopted for detailed design and construction across all four phases.

16.2 In the scoping opinion the Environment Agency had advised that water efficiency /water saving measures should be confirmed. Very general mitigation only is indicated but not confirmed at section 7 of Appendix A to the Sustainability Statement. In Appendix A to the CCoP (Appendix F), Tesco's mixed use sustainability policy is provided. This sets out policies re water usage which are not mentioned in the Sustainability Statement. Are there commitments to these measures, or are they only aims?

As above all objectives and targets have been re-expressed as commitments, including water and energy efficiency targets

17. Appendix E – Site wide sustainability strategy

17.1 Appendix A to Appendix E appears to be the same as Appendix B to Appendix D (with slightly different formatting). Should Appendix B to Appendix D instead be Sustainability Targets for Site Wide Plan, as per the contents page to Appendix D? Please confirm and provide any appropriate additional documentation.

Appendix E has been deleted and replaced with a consolidated document in appendix D.