

- 3.8 NPS EN-1 makes it clear that projects with significant transport implications should include a transport assessment using the WebTAG methodology stipulated in Department for Transport guidance. This requires a detailed consideration of alternatives in transport terms.
- 3.9 The fixing of a peak hour assessment pre-supposes that all worst-case impacts occur at peaks of highest overall traffic flows. This is not true for environmental impacts where the proportional impact of development traffic against what might be a lower base flow could be higher.
- 3.10 Further technical comment on the traffic and transport chapter is included as an appendix to this report.

## **Air Quality**

- 3.11 It is noted that the data in the PEIR is subject to change once the design has been confirmed following Stage 2 consultation. Whilst this is not unusual, what is very disturbing is that the information required to complete the assessments based on the design as it currently stands is incomplete. Little reliance can be placed upon it.
- 3.12 The PEIR notes at paragraph 7.41 that the modelling of the proposed development has been based on the previous summer 2019 design iteration illustrated in Figure 5-2. It is not clear from Figure 5-2 precisely what has been assessed as the drawing does not provide any information on the height of the stack or the height of the buildings at summer 2019. Whilst the PEIR makes it clear that the massing and size of the main building and the ACC have been reduced compared to the design in the assessment, further information is required to understand precisely what was assessed. The assessment presented in the PEIR is not of the proposed scheme and is not, therefore sufficient to be able to understand the likely environmental effects of the proposal.
- 3.13 It is also noted that no information is available on the impacts of atmospheric emissions from road traffic. This is another significant omission which brings into question the validity of any assessment outcomes.
- 3.14 It is clear that the air quality sections of the PEIR are incomplete and not sufficient to understand or adequately assess the air quality effects of the scheme. The PEIR reaches a conclusion of 'not significant' despite presenting evidence which does not support this conclusion. It is highly concerning that conclusions have been reached and reported prior to the required assessment being carried out. The conclusions should be disregarded until such time as they can be supported by a robust air quality assessment.
- 3.15 Further technical comment on the air quality chapter is included as an appendix to this report.

## **Health**

- 3.16 It is not clear how the conclusions on health impacts have been reached when the Human Health Risk Assessment is still to be produced.
- 3.17 As is made clear in paragraph 8.14, the health assessment draws from the technical outputs from the air quality, noise and vibration, transport, ground conditions, biodiversity