

11-13 ST PANCRAS WAY, LONDON

2011/1586/P

**SUPPLEMENTARY INFORMATION IN SUPPORT OF PROPOSED STUDENT
ACCOMMODATION**

ON BEHALF OF UNITE GROUP PLC AND TRAVIS PERKINS PLC

JUNE 2011

EXECUTIVE SUMMARY

This Statement has been prepared on behalf of UNITE Group Plc and Travis Perkins Plc to respond to initial comments received from the London Borough of Camden, the GLA and the Kings Cross and Regents Canal Conservation Area Committees in respect of the application scheme currently under consideration for the redevelopment of 11-13 St Pancras Way.

Supplementary information is provided in respect of the following matters:

Over concentration - additional analysis is provided to demonstrate that the development of 564 student units on the application site will not adversely impact on the local community, including:

- Information establishing that a significant number of students already study nearby to the site at the Royal Veterinary College with many more students due to be studying in the area in the future at the University of the Arts at Kings Cross;
- Consideration of the Inspector's recommendations following the examination of the London Plan that student accommodation should be clustered, located nearby to existing HEIs and away from established family housing;
- UNITE's exemplary track record for managing student accommodation with the London Borough of Camden and the wider London area; and

- The level of support for scheme from all three Ward Councillors and Elm Village residents association and the complete absence of objections from local residents at the pre-application or application stage.

Design - alterations to the scheme have been made including sketches to suggest possible alterations to the southern part of the ground floor to break up the St Pancras Way frontage and to the fenestration to provide a greater level of interest and variation. Furthermore, alterations have been made at the upper levels to introduce greater vertical definition to further enhance the design quality of the scheme;

Internal Layout of Student Accommodation - further information and analysis provided to demonstrate the correct format and amount of communal amenity space is proposed based on the view's of UNITE's Head of Operations;

Inclusive Design and Accessibility - additional analysis outlined to demonstrate the development is capable of meeting the current and future requirements for accessible rooms. Further details of the level of demand for accessible rooms experienced by UNITE across the company's entire portfolio of accommodation. Minor alternations to the Travis Perkins staff accommodation to ensure the staff accommodation is fully compliant with ADM requirements;

Climate change and sustainability - supplementary information relating to the size and location of the CHP plant and correspondence in respect of the Euston Road district heating scheme. Amended drawings to illustrate the incorporation of 324 sqm of PV panels to the roofs of Block A and B to ensure compliance with relevant regional and local policies; and

Transport - in addition to the earlier response provided to TfL further amendments have been made including provision of additional dedicated cycle lift, additional cycle spaces for use by staff of Travis Perkins and minor alterations to parking layout.

The above information has been provided to comprehensively respond to comments made to date. We remain of the view that the application scheme would assist in meeting the significant shortfall of student accommodation in the Borough without any detriment to balance of uses in the area. In addition, we consider the minor alterations made to the scheme fully address the matters raised by Camden, the GLA and the Conservation Area Committees.

1.0 INTRODUCTION

This statement has been prepared in accordance with the instructions of UNITE Group Plc and Travis Perkins Plc to respond to the initial comments provided in respect of the planning application (LPA Ref:2011/1586/P) for the mixed use redevelopment of the above site, comprising:

- i. initial observations from the officers at the London Borough of Camden (hereafter the Council) provided in the meeting with Amanda Peck on 23rd May 2011 and subsequent discussions with Charlie Rose;
- ii. the Stage 1 Report issued by the Greater London Authority (hereafter the GLA) on 25th May 2011.
- iii. the observations of the Regents Canal and Kings Cross Central Conservation Area Committees.

This statement should be read alongside the suite of application documentation which forms the original submission.

It is important to note that there have also been a number of consultee responses submitted to the Local Planning Authority in support of the scheme, including:

- i. all 3 Ward Councillors;
- ii. the Elms Village Residents association.
- iii. St Mungos who immediately adjoin the site.

Also of significance, is the fact that no objections to the scheme have been made by residents living in the area, despite a public exhibition (with flyers hand delivered to 1,500 residents) held before the submission of the application and notification of 93 residents by Camden Council.

The additional information is structured as follows:

- **Section 2.0** - provides further evidence of our case on overconcentration;
- **Section 3.0** - responds to comments received relating to design;
- **Section 4.0** - outlines further information to demonstrate the correct balance of communal amenity space is proposed;

- **Section 5.0** - further analysis to demonstrate that the number of accessible rooms proposed will adequately meet current and future requirements;
- **Section 6.0** - additional details in respect of climate change mitigation and renewable energy; and
- **Section 7.0** - confirmation of the alterations made in response to the comments received from TfL.

To supplement this report the following documents are appended:

- A** Text of Policy 3.8 of the draft London Plan as amended by the Inspector's Report;
- B** Supplementary Student Accommodation Needs Survey (Savills);
- C** Analysis of characteristics of the appeal decisions appended to the original Planning Statement;
- D** Site context plans of appeal schemes;
- E** Sketches of suggested alterations to the ground floor street frontage at the southern end of the site;
- F** Sketches of suggested alterations to the upper floors elevations;
- G** Letter for UNITE's Head of Operations relating to community floorspace requirements;
- H** Amended scheme drawings:
 - Proposed floor plan 1 of 11 - 0500 102;
 - Proposed floor plan 2 of 11 - 0500 103;
 - Proposed floor plan 4 of 11 - 0500 105;
 - Proposed floor plan 5 of 11 - 0500 106;
 - Proposed floor plan 6 of 11 - 0500 107;
 - Proposed floor plan 8 of 11 - 0500 109;
 - Proposed floor plan 10 of 11 - 0500 111;
 - DDA Studio proposed plan and elevations - 0500 901;
 - DDA Bedroom proposed plan and elevations - 0500 902; and
 - DDA Kitchen proposed plan and elevations - 0500 903
- I** Amended Energy Statement (Applied Energy)

J Report from Meinhardt - Application of Sustainable Urban Drainage Systems

2.0 NUMBER OF STUDENTS AT UPPER LEVELS

At our recent meeting Amanda Peck accepted that the replacement of the Travis Perkins use was fully consistent with policy and that the principle of student accommodation at the upper levels was acceptable however some concerns remained regarding the number of students proposed. The concern is that the number of students proposed will result in an overconcentration of students which will harm the local community and be contrary to adopted Policy DP9. In response the following additional information is provided in addition to the information provided in our original submission.

1. London Plan Inspector's Report - Following the submission of the application the Panel Report to the Draft London Plan was published on 3rd May and is an important material consideration. The proposed changes to the plan as contained in the Panel Report require that student accommodation is concentrated and directed to locations nearby to existing Higher Education Institutes and away from family housing. The text of Policy 3.8 of the draft London Plan as amended by the Inspector's report is provided at **Appendix A**. In this respect the site is located directly adjacent to the Royal Veterinary College which supports over 1700 students. Furthermore in September 2011 the University of Arts will open their campus as part of the Kings Cross Central development which will be about 800 metres walk away. Furthermore whilst there is some family housing in relatively close proximity to the site, as outlined above they have been no letters of objection to the scheme and one of the nearby residents association has expressed support for the scheme. This is exactly the type of location where the London Plan Inspector is directing student accommodation to. Indeed the GLA's Stage 1 response fully supports the introduction of student accommodation at the upper levels of the scheme.

2. Supplementary Student Accommodation Needs Survey - As we discussed at the meeting with Amanda Peck and have noted above there are already a large number of students studying in St Pancras and Somers Town Ward and indeed directly adjacent to the site. Savills have provided an updated report (at **Appendix B**) which confirms:

a. following the opening of the University of the Arts there will be 5,127 students in the local area;

b. there are currently only 483 bedspaces in the ward with a further 685 units with planning permission but yet to be built, leaving a shortfall of almost 5,000 students without purpose built accommodation in the ward;

c. there is evidence that the existing RVC students are struggling to find suitable accommodation close to the campus;

d. Research undertaken by Savills indicates that students ideally like to live nearby to their place of student (page 3 of Savill's update report). Taking this into account it is highly likely that students study at the RVC and future students of the University of the Arts at Kings Cross will be living in general needs housing within the ward. The proposed accommodation at St Pancras Way will assist in alleviating this demand and ensuring the housing remains available to local residents.

3. Limited number of complaints against existing UNITE accommodation in Camden - As we promised at the meeting with Amanda Peck we have looked into the records of the Council's Environmental Health Department (EHD) concerning UNITE's other student accommodation in Camden. The EHD have confirmed that there have been two complaints since 2005 as demonstrated from the following table.

	Location	Number of Units	Complaints Received	Date	Action Taken by UNITE
1	Somerset Court (2006)	168	1 re: music	July 2009	Dealt with UNITE Management. No further action deemed necessary by Camden.
2	Kirby Street (2007)	144	1 re: music	May 2011	Being Dealt with by UNITE Management.
3	Woburn Place (2008)	468	N/A	N/A	N/A
4	Bartholomew (2009)	54	N/A	N/A	N/A
5	Beaumont Court (2006)	232	N/A	N/A	N/A
6	Mary Brancker (2005)	182	N/A	N/A	N/A

By any analysis the accumulation of only 2 complaints from nearly 1250 student rooms over 6 years is statistically insignificant. This reinforces our argument that the provision of purpose built student accommodation by UNITE with their well established and practiced management systems and plans ensure there is no direct adverse impact on any neighbouring residents. In addition, the Elms Village Residents Association noted in their response that they were not aware of any antisocial behaviour from existing students in the area, which reflects the information in the above table.

4. Review of Three Colts Lane appeal decision - As the relevance of certain parts of this appeal decision to the application proposals was raised in our meeting with Amanda Peck we have provided a detailed analysis of the characteristics of each of the 4 appeal decisions appended to the original Planning Statement and the application site. This is included at **Appendix C**. The table should be read in conjunction with the site context plans for each of the appeal schemes at **Appendix D**.

There are a number of key differences between the Three Colts Lane and the application site:

- a. the application site is located directly adjacent to a major college whereas at Three Colts Lane the nearest HEI is over a mile away;
- b. a number of local residents expressed their concerns about the impact of the introduction of more students and pursued these concerns at both the application and appeal stage;
- c. the main route to the student accommodation from nearby public transport connections would be directly through a quiet residential neighbourhood.

It is notable that in the Three Colts Lane appeal decision, locating student accommodation closed by to educational establishments to reduce the need to travel is a 'worthy objective' and 'in an ideal world would be achieved on every occasion.' Furthermore of all the schemes compared, St Pancras Way is located considerably closer to existing HEIs.

Whilst other developments for student accommodation have been dismissed by Inspectors in the past each application needs to be assessed on its own merits as recognised by Policy DP9 and the Housing SDP. The context of the application site is quite different to recent appeal schemes. The Belmont Street appeal was dismissed on the basis of the site being located within an area containing a large number of residential properties, a number of whom's residents had strenuously objected to the scheme.

In our opinion the Blackburn Road site is the most similar to the application site both in terms of its current nature and the fact that significant future development is identified in the emerging development plan documents. It was found by the Inspector at the Blackburn Road appeal that the area is 'undeniably mixed in nature' and, therefore, 347 students is not an unacceptably large number. In this instance the Inspector considered the future development of the area to be an important determining factor.

Summary - There is an undisputed need for additional student accommodation in Camden and it is accepted that this site is suitable for some form of provision. This statement has set out to quell the officer's concerns that the provision of 564 students will comprise an overconcentration which will have an adverse impact on the local community. In response two factors are of prime importance.

Firstly, the application site is located directly adjacent to an existing major college and thus is an area which already accommodates a number of students, including an adjacent UNITE block at Beaumont Court and the only RVC purpose built block closest to the University. This is exactly the type of location, which the recently released Inspector's report for the London Plan Review, advises that further student accommodation should be directed to.

Secondly there has been a complete absence of local opposition to the planning application. Indeed support has been received from all 3 Ward Councillors and the Elms Village Residents Association. UNITE have an unrivalled track record in delivering student accommodation both across London and Camden which happily co-exist with neighbouring communities. This is evidenced by the low levels of complaints recorded by the Council's EHD.

In terms of the indicators of an overconcentration of student accommodation as provided at Paragraph 9.9 of the supporting text to Policy DP9 we have demonstrated that UNITE's management systems ensure noise disturbance is minimised and WSP's Transport Statements demonstrates that there will be no adverse impact on public transport. The proposals will actually result in the upgrading of the existing Travis Perkins, which provides a valuable service. As we set out in the Planning Statement students also bring benefits to local communities which should not be overlooked, including volunteer work, increased spending in the local economy and a sense of vibrancy. This is recognised by the comments recently submitted by the Elm Village Residents Associates which considers students in the area will enhance demography and economy of the area.

3.0 DESIGN

We have received comments relating to design from various sources, which we address in turn below. Together with the Design and Access Statement the additional commentary below demonstrates policy compliance with policies CS14 and DP24 in that the development secures a highly quality of design.

1. Regents Canal Conservation Area Advisory Committee (RCCAAC)

Bellis Cooley prepared an additional drawing which sought to allay the RCCAAC's concerns that the proposed building would have an adverse impact on the setting of the conservation area when viewed from the tow path. This was submitted to the Council on 27th May 2011 and copied to the RCCAAC. The concern was that the building would be overbearing on the view from the canal, but we feel the drawing shows that there is in fact no perceptible impact on the canal.

2. Kings Cross Conservation Area Advisory Committee (KCCAAC)

Comments from the above committee which directly bounds the site on the south and west side suggest that they accept that the general building form, mass and height will have no negative impact on the Conservation Area. However they were concerned as to the effect at street level. To help the analysis we have broken down their concerns into the individual points as follows:

Whereas the frontage of about 170 metres is at present broken into shorter lengths of buildings alternating with open yards, the proposal is for one continuous and relentless building.

We feel the plans have been misunderstood in this respect. The proposed elevation, rather than being one long relentless façade is in fact broken into three stepped elements which in turn are punctuated by a large and visible entrance to the student housing, an entrance and exit to the builders' merchants and a showroom building to the office and shop. The rest of the façade consists of an open fence designed in a rhythmic pattern to allow visibility into the builders' merchants. We have developed this design in consultation with the Council's design and conservation officer and we feel it improves the vitality of the street when

compared to the current situation. It should also be noted that only a small part of this façade at the south end is visible from the Conservation Area.

A façade design of a tall metal fence below a continuous fascia beam is applied over most of this length..... The unrelieved 6 metres height of this storey, which is very much more than the pavement width, exacerbates the situation.

The metal fence is a fundamental programmatic requirement of the builders' merchants, and the 'fascia beam' is an intentional tectonic element to give a clear structural and legible definition between the two distinct uses on the site. The overall height of this element is similar to the existing blank walls on the site and we feel that by opening up this façade the streetscape will be much improved from the existing condition.

The use of the ground floor towards the South end as a plant room extends this unwelcoming façade, whereas this part would be better used for much needed shops.

The large gateway to the South end is similarly hostile in its design.

Fundamentally, the Builders' Merchants cannot operate effectively if it loses operational area to shops. The location of the associated shop and office at the north end of the site is also an essential requirement of the brief, it needing to be near the exit where payment occurs. Furthermore, a large and efficient plant room is required for the whole development and this needs to be serviceable and unobtrusive to the operation of the Builders' Merchants, so there is no other logical location for it.

However, we understand that relative to the Conservation Area, it is this part of the building that will have the most effect. Therefore we have looked at how we can give the south end a more friendly aspect to the street.

We are engaging in further discussions on this point, but have appended sketches at **Appendix E** which show how we propose to achieve this. We intend to remove the frame over the car park entrance, and make the fence a more traditional black metal enclosure. We are also pulling back the concrete podium to the upper building line and changing the façade treatment to reflect more the shop feel of the north end of the site. Along with an

increase in low maintenance climbing plants, we intend that this area of the scheme will be softened somewhat, whilst still retaining the industrial aesthetic appropriate to its history and purpose.

3. Greater London Authority Stage 1 Report

The GLA raises a number of design points which we have broken down into the following components.

Ground Floor Commercial Use

At the southern end ... there is a concern that there is little relief to the façade, resulting in a monotonous and over dominant presence in the street.

This was also raised by the Kings Cross Conservation Area Advisory Committee and we are seeking to address this as discussed above and have included an alternative sketch at **Appendix E**.

Scale, bulk, massing and architecture

Due to the modular pre-fabricated nature of the building proposed, the ability to incorporate any significant variation or articulation to the building is restricted. Such a system allows limited depth and reveals to the façade, or variations to block design as design features. Such an approach also results in a monotonous and repetitive pattern to the fenestration.

It is queried as to whether the depth of the reveals shown in the visualisations can be realistically achieved in light of the limitations imposed by the modular system with its 'skin like' façade treatment.

The programmatic requirement of the student housing results in a repetitive plan that is naturally expressed on the elevation. The modular construction does require certain structural conditions that limit façade expression, however we are now looking at increasing the amount of traditional construction on the site, allowing for the expression of the protruding boxes, a feature of the design that is generally considered by all to be successful.

We are currently discussing options with Camden's design officer. Suggested options to improve the expression of the elevation and are included at **Appendix F**.

The reveals are shown as being very deep to give expression to the façade. This can be achieved by applying the brickwork to a secondary structural skin and the detail of this can be conditioned as part of any approval.

Concerns remain regarding the scale, bulk and massing particularly in views North along St. Pancras Way, Granary Way and also from Royal College Street to the West.

Block A comes directly to the line of the street. Whilst this is not excessively long as a building in its own right, we are looking at options to break up this length of façade by the introduction of expressive elements such as breaks in the brickwork.

The view from Royal College Street, where the top floor appears particularly dominant, would also be improved through its removal.

The highest part of the scheme is not visible from Royal College Street, although Block C, a slightly lower block, is. There is a narrow angle of view towards the site from Royal College Street and the view shown in the Design and Access Statement is, we feel, an accurate expression of how the scheme would look. We don't feel that the loss of the top floor would make a great difference to this view, but we could introduce similar improvements to the façade expression as we are proposing to the front.

Fenestration

There is a concern that the side elevations to block D, as well as the front elevation of the building still appear particularly repetitive, by reason of their size and regular pattern, and the scale of the development.

As noted above we are in discussions with the Council's Design Officer to improve the fenestration. These alternations are will allow larger windows to be provided to some of the rooms and communal areas in response to the comments made by the GLA at Paragraph 35 of the Stage 1 Report.

The principles, when agreed, could be applied to all parts of the scheme and we note the comments relating to the side elevations of block D.

4.0 INTERNAL LAYOUT OF STUDENT ACCOMMODATION

In response to comments made by the GLA and also Camden's regeneration team further information has been sought in order to demonstrate that the form and quantity of communal floorspace provided within the scheme is wholly acceptable.

Appendix H contains a letter from UNITE's Head of Operations outlining the company's extensive experience and requirements from students for communal areas. UNITE's experience in providing student accommodation has lead the company to understand that students generally prefer to use small study rooms and the communal areas in cluster flats to socialise. The incorporation of community space at St Pancras Way has been developed directly as a result of this experience and through surveys with their students.

The below table provides a comparison of the proposed community floorspace against other student accommodation developments operated by UNITE in Camden and other similarly sized schemes in London. As can be seen, the scheme compares very favourably to all but one development.

	Ward/Local Planning Authority	Year Opened	Total beds	Common rooms (sqm)	Study rooms (sqm)	Total Internal Community Space (sqm)	Space per bedspace (sqm)
Camden Schemes							
St Pancras Way	St Pancras & Somers Town	N/A	564	196.9	65	261.9	0.46
Mary Brancker House	Kentish Town	2005	182	52	0	52	0.29
Beaumont Court	St Pancras & Somers Town	2006	232	50.8	0	50.8	0.22
Somerset Court	St Pancras & Somers Town	2006	168	26.88	0	26.88	0.16
Kirby Street	Holborn & Covent Garden	2007	144	45.6	0	183.2	1.27
Woburn Place	Bloomsbury	2008	468	120.3	62.9	0	0.00
Bartholomew Road	Kentish Town	2009	54	0	0	0	0.00
London Schemes							
Emily Bowes Court	Haringey / London	2009	693	299.2	0	299.2	0.43
James Leicester Hall	Islington / London	2011	573	137.35	0	137	0.24

On this basis UNITE believe they have got the right balance of communal amenity space within the proposed scheme.

5.0 INCLUSIVE DESIGN AND ACCESSIBILITY

Response to London Borough of Camden

As requested by Camden's Access Officer the following alterations have been made to the scheme, as shown on the enclosed drawings at **Appendix G**:

- Electric scooter parking/charging point provided in the cycle store area;
- Accessible parking for the accommodation amended;
- Facilities for ambulant disabled toilets provided. One in the showroom and one in the staff room;
- Staff area shower room and accessible WC amended to comply fully with ADM requirements;

- Detailed layout drawings of accessible studios, bedrooms and kitchens to show the compliance with ADM provided;
- 5% (28) of the rooms designed to special requirements and they are fully accessible in accordance with Part M;
- A clear 300mm to the leading edge of the pull side of the doors added to comply with ADM requirements; and
- Minimum width of the corridors to the proposed accessible rooms is 1077 mm.

Whilst the Council's Access Officer is pushing for 10% of the rooms to be designed to be capable of occupation by disabled people this is considered inappropriate for this scheme for the following reasons:

1. The 10% policy is designed to address general needs housing;
2. UNITE currently have only one wheelchair using student in their entire London portfolio of 5664 beds. In 08/09 one accessible room was rented to a wheelchair user and another was rented to an able-bodied user. 87 units went unrented that year. Similarly in 09/10 one was rented to a wheelchair user, one to an otherwise disabled user, 27 to able-bodied users and 67 went unrented;
3. In terms of the nationwide picture, according to the latest HESA data there were 900,000 odd fulltime students in 2007/08 throughout the UK. Of these only 2,500 were wheelchair students aka less than 0.1%.

Accordingly, it is considered that the proposed approach of fitting out 1% of the student rooms as wheelchair accommodation will more than adequately meet the demand. For future requirements a further 4% will be capable of conversion. UNITE have specified annual times when students move in and all students need to give at least two weeks notice. This leave sufficient time to adapt the rooms to disabled needs should there be a sudden and significant uplift in demand.

Response to Comments of GLA

The GLA made comments on the scheme in terms of accessibility which we have addressed as follows:

(item 41) Large scale plans required, showing that the scheme can provide 5% accessible rooms.

We attach plans that show 22 accessible studios, all of which can be accessed via two lifts. We also show in more detail how these studios are adapted to be fully accessible.

We have also updated the location of the accessible rooms in cluster flats, to show how the kitchens can be made to be fully accessible. There are now 6 accessible rooms spread out across cluster flats. We include detailed drawings of the accessible rooms and associated kitchens. We have only drawn up the smallest accessible kitchen at this stage as the larger kitchens will no doubt be able to be accessible.

Together the 22 accessible studios and 6 accessible rooms within cluster flats totals 5% of the proposed accommodation.

(item 42) One cluster flat on podium would be suitable for a disabled person with live in carer. More discussion on how this could be fitted out would be welcome.

We have deliberately made this flat non-modular traditional construction allowing a very flexible fit out. As each disabled person has specific requirements, then this would indeed be an ideal location for a more bespoke design. It is currently shown as indicative. As UNITE's Accessibility Management Plan states, there is a minimum two week window to provide for any adaptations.

(item 43) Concern that the communal space for the cluster flat is constrained.

We have adjusted the location of designated fully accessible rooms to address this concern. The cluster flats with the larger kitchens are designated as having rooms that are fully accessible.

(item 44) Need to show that 22 rooms are capable of adaptation

Our updated plans show the locations of all accessible rooms both fully and partially adapted. The nature of the modular construction means that even the 4% not fully fitted out will still be proportioned the same as fully accessible rooms, so on our plans there appears little difference. The fitting out is a question of detail and the detailed plans show how the furniture would be adapted. However, each module can be adapted to specific needs.

6.0 SUSTAINABILITY AND CLIMATE CHANGE

A supplementary report provided by Applied Energy can be found at **Appendix I** which directly responds to the comments contained in the GLA Stage 1 Report. The additional information provided demonstrates that the application proposals are fully compliant with the relevant policies of the London as well as local policies including CS13 relating to climate change and policy DP22 which promotes sustainable design and construction.

Climate Change Mitigation

- Improved U-Values within the building's facade has been incorporated;
- Further details of the potential to connect to the Euston Road district heating scheme is provided;
- Details of the calculations methods of the carbon savings achieved from the CHP plant;
- Layout of the plant to illustrate the size and location of the CHP plant; and
- Details of the measures employed to avoid heat gain within the student accommodation;

Renewable Energy

In response to the GLA Stage 1 report, the roofs of the scheme have been revisited and PV panels have been incorporated to Blocks A and B to provide a total of 324 sqm of PV

collector area which would reduce carbon dioxide emissions by a further 7.5% in addition to the savings accrued from energy saving measures and the provision of a CHP plant.

Sustainable Urban Drainage System

The green roofs proposed to all roof areas in part contribute towards a sustainable drainage mechanism for the development. They all act as a source control system to decrease the volume of water entering the draining network by intercepting run off water on roofs for subsequent re-use. Further details are provided in the report at **Appendix J** provided by Meinhardt.

7.0 TRANSPORT

A comprehensive response to the comments made by Transport for London was issued on 25th May which deals with the transport comments contained in the GLA Stage 1 Report. The comments made demonstrate the scheme is fully compliant with the relevant policies of the London Plan and also policy CS11 of the Core Strategy which seeks to promote sustainable and efficient travel. The potential transport implications of the scheme has also been fully considered in accordance with policy DP16. In addition, to the response already made a meeting has been arranged with TfL on 6th June to discuss the scheme in greater detail.

In response to the comments made the scheme drawings have been updated to show the following changes as requested by TfL and the GLA:

- Provision of a dedicated cycle lift next to the large cycle store, which is housed within the escape stair enclosure previously proposed. This is in addition to the cycle lift next to the entrance which serves the primary cycle store as well as the podium level;
- Electric vehicle charge points have been moved to be accessible to all parking spaces;
- Minor adjustments to the parking layout have been incorporated in response to TfL's comments;
- Three additional cycle parking spaces added adjacent to the staff room area; and

- Route for staff between showroom and mess room added

CgMs Ltd

June 2011