

Policy 4B.1 (Design Principles for a Compact City) states that development should:

- promote high quality inclusive design and enhance the public realm;
- respect local context, history, built heritage, character and communities;
- be accessible, usable and permeable for all users;
- be sustainable, durable and adaptable;
- address security issues and provide for safe, secure and sustainable environments;
- be practical and legible; and
- be attractive, and where appropriate, inspire, excite and delight.

Policy 4B.5 (Creating an Inclusive Environment) and Policy 4B.6 (Safety, Security and Fire Prevention and Protection) further reiterate the requirement for developments to adopt principles of inclusive design. How the proposal accords with these policies is addressed in Part 3 of this statement.

The London Plan, consultation draft replacement plan (October 2009), when adopted, will provide the spatial planning framework for London looking forward to 2031 and will replace the existing London Plan. The draft plan maintains the key concept of promoting sustainable development and specifically encourages more walking and cycling as part of one of the 6 main objectives. Draft Policy 6.9 specifically relates to promoting a significant increase in cycling in London and states that:



- the Mayor will "implement the central London cycle hire scheme...";
- developments should "facilitate the central London cycle hire scheme"; and
- through LDF preparation DPDs should "identify and safeguard sites for cycle docking stations to expand the Mayor's London cycle hire scheme.

Paragraph 6.30 goes on to state that "boroughs should further promote cycling by rolling out provision for the Mayor's cycle hire scheme..." which is consistent with the preceding draft policy.

Unitary Development Plan

The London Borough of Camden's Unitary Development Plan (adopted June 2006) (UDP) sets out the borough's policies for development and conservation, transportation, leisure and recreation.



Policy T1A (Sustainable Transport) seeks to ensure that all new development will encourage walking, cycling and the use of public transport. Policy T3 (Pedestrians and Cycling) seeks to secure improvements to the walking and cycling environment and to safeguard the safety of pedestrians and cyclists.

Policy T7 (Off-Street Parking, City Car Clubs and City Bike Schemes) confirms the Councils support for bicycle schemes as an alternative to the use of the private car. The Scheme introduces cycling as a new transport mode which supports these policies.

Policy SD1 (Quality of Life) seeks to ensure that all new development will foster sustainable communities. Policy SD9 (Resources and Energy) seeks to ensure that developments will be designed to conserve energy and natural resources. The Scheme provides for a sustainable and energy efficient form of short journey travel in support of these policies.

Policy B1 (General Design Principles) seeks to ensure that all new development is designed to a high standard, respects its site and setting, promotes energy efficiency and the efficient use of resources and does not harm public amenity. The docking stations have been designed to be in keeping with the existing urban fabric of central London and promotes energy efficiency in support of these policies. Section 5 – Transport sets out objectives related to the Central London Area Clear Zone Region, which includes the Bloomsbury, St Giles, Gray's Inn, Argyle Square and University areas. The Clear Zone Region has a particular set of transport-related problems associated with the large number of people attracted to the area, which includes residents, workers, students and tourists. The zone is affected by traffic congestion and associated pollution. The objective of the Camden Clear Zone Region is to improve the quality of life by:

- reducing the impact of traffic;
- reducing the number of motor vehicles and the pollution from their exhausts;
- promoting the use of vehicles (including public transport and goods vehicles) which use greener fuels and reduce the amount of pollution from exhausts; and
- · reducing the overall demand for transport.

The Scheme promotes a green transport method which would be widely available within the Camden Clear Zone Region.

Policy B6 (Listed Buildings) seeks to resist development which would cause harm to the setting of a listed building. How the proposal preserves the setting of the Grade II listed terrace dwellings and railings (nos 46-70 Huntley Street) is addressed within Part 5 of this Statement.

The site is located partially within the Bloomsbury Conservation Area. Policy B7A (Conservation Areas – Character and Appearance) requires development to preserve or enhance the special character or appearance of the conservation area. How the proposal maintains the character of the Bloomsbury Conservation Area is addressed within Part 5 of this Statement.

Policy N8 (Ancient Woodland and Trees) seeks to ensure that trees in the borough are protected and that trees do not lose their amenity value as a result of new development. How the proposal will protect trees is addressed in Part 5 of this Statement.

Local Development Framework

The Local Development Framework (LDF) sets out the spatial planning strategy for the growth of an area. A fundamental component of the LDF is the Core Strategy, which outlines the spatial vision and strategic objectives for an area. The London Borough of Camden is well progressed with the Camden Core Strategy and Development Policies Document having both been submitted to the Secretary of State in January 2010. Both of these documents are currently awaiting examination by a Planning Inspector.





The Core Strategy outlines a number of key issues for the future development of Camden. Those of particular relevance are:

- The quality of the environment;
- climate change and sustainability; and
- improving transport.

Core Strategy CS11 (Promoting sustainable and efficient travel) seeks the continual improvement of facilities for cyclists, including increasing the availability of cycle parking, helping to deliver the London Cycle Hire Scheme, and enhancing cycle links. CS14 (Promoting high quality places and conserving our heritage) seeks to ensure that Camden's places are attractive, safe and easy to use by requiring development of the highest standard of design that respects local context and character. CS14 also seeks to preserves and enhances Camden's rich and diverse heritage (including conservation areas, listed buildings and historic parks and gardens).

The Cycle Hire Scheme will promote cycling as an alternative mode of travel for short journeys. The docking station has adopted principles of high quality design and consideration has been given to the need to preserve and enhance the built heritage in selecting a suitable site. For these reasons, the proposal is considered to comply with the emerging LDF.

4.3 Other Planning Documents

National Policy Documents

Planning Policy Statement 1: Delivering Sustainable Development (PPS1) (January 2005), sets out the Government's overarching policies for the delivery of sustainable development through the planning system. PPS 1 recognises that the planning system should secure more sustainable patterns of development and that improved accessibility to facilities by walking, cycling and public transport should be encouraged.



This is reinforced in *Planning Policy Guidance 13: Transport* (PPG13) (March 2001) which promotes accessibility to jobs, shopping, leisure facilities and services by way of public transport, walking and cycling. PPG 13 seeks to provide more road space for cyclists and to ensure day to day facilities can easily and safely be accessed by cyclists. PPG 13 also encourages local authorities to seek the provision of convenient, safe and secure bicycle parking.

Planning Policy Gudiance15: Planning and the Historic Environment (1994) provides comprehensive advice on listed buildings, conservation areas and the historic environment. The guidance reinforces the requirement that special attention should be paid to the desirability of preserving or enhancing the character or appearance of any conservation area. It advises that development within the historic environment should be of a high quality design.

Chapter 5 of PPG 15 deals with Transport and Traffic Management, and sets out the following guidance:

The Government's commitment to sustainable development entails greater integration of transport...to minimise the environmental impacts of transport....In developing policies and projects it is essential, therefore, that local highway and planning authorities take full account of the wider costs of transport choices, including impact on the historic environment.

In due course, PPG15 will be replaced by PPS15 (Planning for the Historic Environment. A final draft of PPS15 is expected to be published in Spring 2010.

Sustainable Future for Cycling published in January 2008 sets out the Government's planning policy direction regarding cycling. It recognises the important contribution of cycling as a sustainable form of transport and how cycling contributes to every one of the five goals set out in *Towards a Sustainable Transport System: Supporting Economic Growth in a Low Carbon World* (published October 2007), namely:

- · competitiveness and productivity;
- climate change;
- health, security and safety;
- · quality of life; and
- equality of opportunity.



The Scheme supports national policy and guidance seeking to achieve a more sustainable transport system.

The Mayor's Transport Strategy

The Mayor's Transport Strategy (adopted in 2001) sets out policies to improve transport within Greater London. It promotes investment in London's infrastructure and public services to accommodate sustainable growth in London.



The strategy recognises that transport investment in new major projects and other measures (such as promoting and encouraging cycling) is required to achieve sustainable growth. Policy 3.3 states that transport investment should support sustainable economic growth. The Scheme will assist to promote cycling and support sustainable economic growth consistent with this policy. The Transport Strategy recognises the health benefits of cycling. Proposal 3.7 states that transport initiatives should contribute to the improved health of Londoners by promoting healthier modes of transport. The Scheme, will promote exercise which will provide health benefits for users and in support of this policy.

The Mayor's Transport Strategy is currently under review and a draft for public consultation was published in October 2009. The draft replacement strategy maintains the strong stance of supporting a 'cycling revolution' and Proposal 53 specifically refers to the delivery of the cycle hire scheme in central London in 2010.

The *Transport for London Business Plan 2009/10 – 2017/18* (2008) sets out targets for transport investment within London in the next 10 years. It reinforces the Mayor's key transport priority of increasing cycling and walking in London and specifically states that a cycle hire scheme will be delivered as a means of significantly increasing cycling throughout London.

London Cycling Action Plan

The *London Cycling Action Plan* (February 2004), sets out measures to help achieve the Mayor's vision of developing London as an exemplary sustainable world city and promotes cycling as a means of achieving key priorities within the Transport Strategy. In particular:

- objective 2 seeks to increase cycle accessibility, safety and priority;
- objective 4 gives support for innovative cycle schemes; and
- objective 5 seeks to promote cycling and its status.

The Scheme, by increasing accessibility to cycling and promoting cycling as an alternative transport mode, supports the London Cycling Action Plan.

The London Health Inequalities Strategy

A draft of this strategy was published for public consultation in August 2009. The cycle hire scheme is stated as one of a number of cycling initiatives that will assist in achieving delivery of 2 of the 5 main objectives.

The cycle hire scheme is supported by objective 1 (Empowering individuals and communities) and objective 5 (Healthy places).

The Scheme by improving cycling opportunities within central London has the potential to assist in reducing health inequalities. On this basis the Scheme supports this draft strategy.



Leading to a greener London

Published in July 2009, this document sets out key elements of the Mayor's vision for improvements in London's environment. A key element of this vision is to reduce the environmental impact of transport, and a priority programme is to create a cycling revolution in London.



The document acknowledges the need for a step change in journeys by bike and identifies the cycle hire scheme as an integral component of a broad, coordinated series of improvements.

The Mayor's draft Climate Change Mitigation and Energy Strategy

Delivering London's energy future was published in February 2010 for consultation with the London Assembly and Greater London Authority functional bodies.

The draft Strategy plans to cut carbon from London's transport. Action 10.7 under Policy 10 promotes the development of the London Cycle Hire Scheme as part of a cycling revolution.



Local Implementation Plan

Each borough is required to produce a Local Implementation Plan (LIP) setting out how local transport improvements will brought forward and financed. The London Borough of Camden's LIP reiterates the policy framework within the Mayor's Transport Strategy and outlines a number of measures for the implementation of the strategy. Of particular relevance is an objective to reduce vehicular traffic flows through the borough and encourage a shift to more sustainable modes of transport. The Scheme will assist a shift to a more sustainable mode of travel in accordance with the LIP.

Supplementary Planning Guidance

The Camden Planning Guidance (2006) provides additional advice and guidance for development proposals. In relation to design, the guidance seeks to:

- ensure the highest standards of access and inclusion (Paragraph 1.1);
- provide for connectivity to, from, around, and through sites for people using all modes of transport, including pedestrians, cyclists etc. (Paragraph 15.8);
- respect the built form, character, history, archaeology and nature of existing buildings on the site and other buildings immediately adjacent and in the surrounding area. (Paragraph 15.8);
- respect and be sensitive to natural and physical features, both on and off the site. (Paragraph 15.8);
- improve pedestrian access through the street environment by minimising the adverse effects of vehicular movement (including cycling) and obstructed to pedestrian routes (Paragraph 31.6); and
- ensure transport related street furniture does not interrupt the minimum clear width of the footway (Paragraph 31.15).

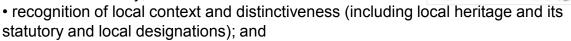
The design of the docking station has fully considered these principles.

4.4 Streetscape Design Guidance

Streetscape Design Guidance: A Design to Better London

Streetscape Guidance, A Guide to Better London (2009) prepared by TfL, sets out design guidance on streetscape issues in London. The document advises on key design principles, including:

- •consistency and clarity;
- •integration and co-ordination;
- •design for people;
- •reduction of crime and disorder;
- •function and safety;



• materials and maintenance.

Camden's *Streetscape Design Manual* (2005) seeks to raise the standard of street works throughout the borough. It sets out six key design principles and provides detailed design guidance for cycle parking. The Borough supports the provision of cycle parking in order to actively encourage cycle use. The Manual notes that cycle parking should be installed wherever demand is evident and where space allows. The guidance is relevant to the proposal in terms of influencing the design, layout and location of the docking station.

These proposed design of the docking station and the arrangement of the docking points and terminal within the site reflects these design guidelines.

The London Cycling Design Standards

The London Cycling Design Standards (2008), prepared by TfL set out design guidance and indicative standards for all cycle schemes in London. Of particular relevance is Section 8 which states that cycle parking facilities should be situated at 'gateway' locations and be an integral part of streetscape design, where possible, complementing existing street furniture. Part 5 explains how the design will complement the existing streetscape.



5. THE APPLICATION

5.1 Site Characteristics

5.1.1 Location

The proposed docking station will be located on the western side of the carriageway and partly on the western footway on Huntley Street, adjacent to nos. 1-30 Gordon Mansions and within the London Borough of Camden. The site is located a short distance from the University College of London and Institute of Education campuses.

Huntley Street is a one-way carriageway linking Grafton Way to the north with Chenies Street to the south (Figure 5.1). The site is located near the junction of Huntley Street and Torrington Place and the western side of the carriageway is designated by single yellow line road markings. A newly planted Field Maple tree lies in the footway towards the northern end of the site. Several parking spaces exist on the opposite (eastern) side of the carriageway. The surrounding area presents a mixture of academic facilities, residential accommodation and research institutes.

The site is within a short distance of Goodge Street, Warren Street and Euston Square London Underground Stations.

Part of the site is located within the Bloomsbury Conservation Area. Opposite the north end of the site (on the eastern side of Huntley Street) lies a row of Grade II listed terrace houses and railings.

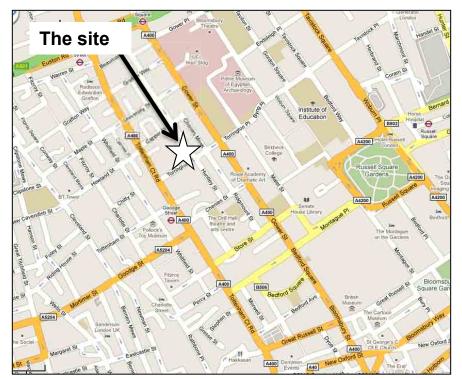


Figure 5.1: Map showing general location of site.



Figure 5.2: Site Location Plan.

5.1.2 Transport Links

The site is located approximately 200 metres from Goodge Street London Underground Station, 480m from Warren Street and Euston Square London Underground Stations. Goodge Street London Underground Station is served by the Northern line, Warren Street London Underground Station is served by the Northern and Victoria lines and Euston Square is served by the Metropolitan, Circle and Hammersmith and City lines.

The site is located a short distance from bus stops on Tottenham Court Road (to the south-west) and Gower Street (to the east). The bus stops at each of these routes provide access to several bus services, including nos. 10, 134, 14, 24, 29 and 390, taking in locations such as Wood Green, Archway London Underground Station, Hammersmith, Putney, Notting Hill and Trafalgar Square.

Huntley Street forms part of London Cycle Route 30 and the site is located immediately to the north of London Cycle Route 29 which is located along Torrington Place. These routes, together with the others in the surrounding area, provide access to the north, south, east and west.

5.1.3 Site Description

The site is located on the western side of the carriageway and partly on the western footway. The carriageway is one-way (southbound) and has a width of 7.5 metres, but narrows to 3.6 metres at its junction with Torrington Place. The footway on the western side of the carriageway has a width of 3.8 metres. The street has low pedestrian and vehicle flows.

A newly planted Field Maple tree lies in the northern part of the site. Aside from a lamp post and bollard to the south of the site, the footway is largely devoid of street furniture .

The site is positioned approximately 12 metres north of the junction of Huntley Street and Torrington Place. The subject site lies adjacent to and opposite the return frontages of Gordon Mansions; a pair of fine Edwardian residential blocks. Further north of the site exists a bland 1950's student union building, whilst opposite the site (to the north-east) lies a row of Grade II listed terrace dwelling and railings.

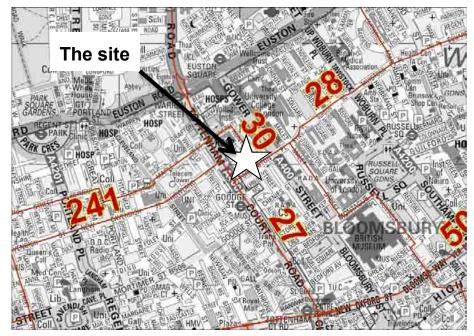


Figure 5.3: London Cycle Network, showing general location of site



Figure 5.4: View of site looking north-west along Huntley Street.

Transport for London

5.2 The Proposal

The proposal is to install a docking station within the heavy dark line on Figure 5.5. These areas will be built out from the existing footpath curb line. The green lines on Figure 5.5 show the area of curb that will also be built out to enable the docking station to operate safely.

As shown in Figure 5.5 the docking points would be split into two areas north and south of the entrance to the adjacent nos 1-30 Gordon Mansions. The northern area would have a maximum length of 14.19 metres and not exceed 1.4 metres in width. The southern area would have a maximum length of 18.60 metres and would not exceed a maximum width of 2.0 metres (Figure 5.5).

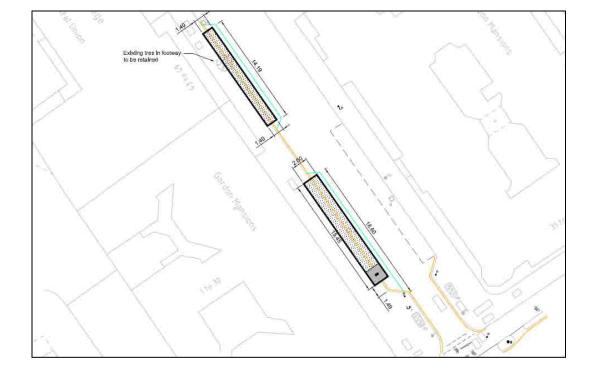


Figure 5.5: Proposed Docking Station Arrangement

The docking station would accommodate a maximum of 30 docking points with the northern section of the docking station laid out in a 45 degree angled row as shown in Figure 5.6. The southern part of the docking station would be laid out in a single linear row (Figure 5.7). The terminal would be positioned at the southern end of the site. The docking station design would accord with the criteria outlined in Section 1.3.

The existing Field Maple tree within the site is to be retained in perpetuity, and no street furniture requires removal or relocation as part of the proposal.

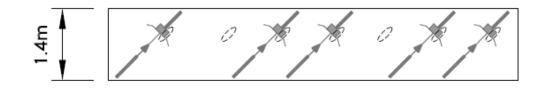


Figure 5.6: Indicative Docking Station Layout (45 degree angled row)

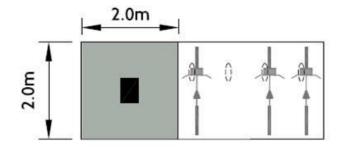


Figure 5.7: Indicative Docking Station Layout (single linear row)

5.3 Key Issues

5.3.1 Traffic and Access

The location of the site provides good access to public transport and to the London Cycle Network. It is within a short distance of Goodge Street, Warren Street and Euston Square London Underground Stations and numerous bus services / routes. The subject site is also well located in terms of access to London's cycle routes. This will ensure easy access to the docking station for a wide range of users.

The docking station will be located on kerb build-outs and will maintain a clear pedestrian path in excess of 2 metres between the boundary of the docking station and the back edge of the footway thereby ensuring clear pedestrian access. A sufficient circulation area will be provided around the terminal to avoid congestion, and a scheme key reader will be installed at each docking point, enabling users to hire bicycles without having to queue at the terminal and thereby minimising the time required for users to be at the cycle station.

The docking station will be located a sufficient distance from the intersection with Huntley Street and Torrington Place and therefore will not conflict with vehicular or pedestrian movement, or obstruct vehicle sight lines.

5.3.2 Townscape and Heritage

Existing Situation

The site is partially located within the Bloomsbury Conservation Area and southwest of a row of Grade II listed terrace dwellings and railings.

The site is located in an area of mixed use; being adjacent to and opposite a pair of Edwardian block of flats and surrounded by buildings associated with the nearby academic establishments (University College of London and Institute of Education) and research institutes.



Figure 5.8: View of the site looking south-east along Huntley Street, with the existing Field Maple tree in the foreground.



Figure 5.9: View of the site looking south along Huntley Street. NB. The Huntley Street entrance to no. 1-30 Gordon Mansions will remain unobstructed

Part 5: THE APPLICATION

Proposed Works

In selecting the docking station site consideration was given to the function of the street and the context of surrounding buildings. The location of the site on the footway built-outs enabled the required distance between the docking stations to be met and has the least impact on the character and appearance of surrounding buildings and general streetscape.

The proposed docking station with kerb build outs will be largely viewed within the same setting as the adjacent nos 1-30 Gordon Mansions and the footway. The location and layout of the docking station would avoid obstructing the entrance to nos 1-30 Gordon Mansions and as such would not materially harm the character or appearance of the surrounding Bloomsbury Conservation Area (Figure 5.8). Furthermore, the location of the docking station would not detract from the setting of the nearby listed terrace dwellings and railings.

The docking station is consistent with the scale, mass and detailing of the existing street furniture and the docking points will be 0.792 metres in height and the width between the centre of each docking point will be 0.75 metres, thereby providing a sense of visual permeability. This will limit the presence of the docking station in the streetscape.

The materials of the docking station will compliment other street furniture within the context of the site. The size and dark-blue colour of the terminal and the layout and size of the docking points have been carefully chosen to ensure the docking station integrates with the sign posts and utilities equipment. Logos for the Mayor, borough and TfL have been discreetly integrated in the design of the docking station.

Because of the modest scale of the docking station and its immediate context the proposal will integrate well into the surrounding streetscape and will preserve the character and appearance of the Bloomsbury Conservation Area and nearby listed buildings.

5.3.3 Trees

The northern section of the proposed docking station will be located around the existing Field Maple tree, which lies towards the northern end of the site. The proposed docking station is located within the Root Protection Area of this tree, which is in good physiological and structural condition.

A tree survey has been carried out and forms part of this application (BS5837.2005 Tree Survey Report, Incorporating Arboricultural Implications Assessment and Methods Statement). The report concludes that assuming that the measures outlined in the Construction Method Statement are adopted, it is considered that the proposed docking would not detrimentally impact on trees within the vicinity of the development.

It is considered that the amenity value of the trees will be maintained, in accordance the Policy N8 of the Camden Plan.

5.4 Application Summary

The application will fully support National and Local Planning Policies and Streetscape Design Guidance. In addition to the wider Scheme benefits which are outlined in Section 2 the Scheme will:

- meet the Borough's site selection criteria (outlined in Section 1.3);
- ensure the delivery of the Cycle Hire Scheme network is at the required density;
- provide a well-considered design that maintains the character of the Bloomsbury Conservation Area and the adjacent listed buildings;
- provide a well-considered design that preserves the amenity value of the nearby trees;
- provide a high quality design which ensures that the development is compatible with the function of the street; and
- will not affect the safety of highway users or affect the flow of pedestrian or vehicular traffic in the area.



APPENDIX 1: Community Consultation

TfL Special Projects team has worked closely with Camden transportation officers on consultation for the Cycle Hire Scheme. Camden officers have engaged with their local Councillors and attended area forums with the local community. TfL has supported these activities by providing background information about the Scheme and communication material.

TfL Arranged Local Information Events

Two events were hosted by TfL and attended by representatives from the London Borough of Camden. They were located specifically to ensure that the five wards affected by the scheme were covered. They took place at:

•<u>Holborn Community Centre</u> - Tuesday 17 March 2009; and •<u>Somers Town Community Centre</u> - Thursday 26 March 2009.

Invitations were sent to local amenity groups, residents, tenants groups and local councillors. Both events were advertised in the local press and posters were placed in local libraries.

Information at each event included:

- •exhibition boards, scheme maps and artist's impression;
- •map with sites marked on it; and
- •photos of proposed locations within the ward.

TfL staff were present to answer questions and note matters raised.

Comments made included:

- support for improved cycle provision in Camden;
- suggestions for additional sites;
- acceptance of the scheme generally but concerns about locations in residential areas;
- · concern about footway locations being obstructed by docking stations;
- · concern about theft of the cycles; and
- safety concerns for pedestrians.

Cycle Hire Presentation at Public Area Forums

Camden officers offered to attend Area Forums in the five affected wards. Presentations were made for two wards at:

- Holborn and Covent Garden Wednesday 4 March, 7.00 9.00pm;
- <u>St Pancras and Somers Town</u> Thursday 12 March, 7.00 9.00pm.

Bloomsbury Councillors wanted information but not a presentation.

The area forums were chaired by the ward Councillors. Liz Halsted and John Bartels (Camden Transport Officers) attended to present the scheme. Attendees included a mixture of individual residents and local groups.

Each area forum included:

- a presentation of the scheme;
- timeframes for the scheme;
- · photos of proposed locations within the ward; and
- time for questions and answers.

Comments made included :

- broad support for the scheme;
- concern for cyclist safety;
- · concern about cycling on footways and cyclists running red lights;
- concern about footway locations being obstructed by docking stations; and
- need for complementary measures as part of the scheme implementation.



APPENDIX 2: Pre Application Advice

Transport for London has met with the London Borough of Camden officers on a regular basis since August 2008 to discuss the selection of sites for docking stations and other matters related to the Cycle Hire Scheme.

Meetings have also been held to seek the advice of planning and design officers in relation to the preparation of planning applications and design matters. The particulars of these meetings are summarised by following table.

Officer(s) name	Date	Summary of Meeting
Meeting with Planning Officer (Vanessa Leddra)	19.01.2009	Pre-application planning meeting discussing application format, phasing of submissions, processing and determination arrangements (i.e. delegated). Agreed to meet again once draft application produced for review.
Telephone Conversation with Borough Lead (Vanessa Leddra)	17.03.2009	Fees, pre-application and formal submission arrangements
Pre-Application Planning Meeting with Planning Officer (Vanessa Leddra)	01/04/09	Encouraged TfL to submit applications at earliest opportunity; LBC would require kerb build-outs on all carriageway sites' VL confirmed application validation requirements; Admin will refer to TfL's cover letter in all cases; LBC to liaise with GLA Tree Officer on appropriate sites; VL requested Crime Prevention Checklist to be completed. LBC to supply TfL with completed checklist for each site. LBC to provide TfL with justification for loss of car parking (on appropriate sites) TfL to submit applications to Camden in phases; LBC accept tress scoping report for some sites where trees are close to the site, but not problematic in terms of their effect on the development. LBC agreed that TfL would submit 3 x copies of the application documents – Under 10MG (on planning portal); Photomontages sought for sensitive applications; 1:100 Drawings will be required (terminal and docking points) Planning condition would be imposed confirming appropriate ground surface materials; LBC would seek regulatory conditions (where appropriate);