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## Wandsworth Council

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Our ref: 2008/4488  
Your ref:  
Date: 23rd January 2009

Dear Mr Owens

### Land at St John's Hill, Falcon Road and Grant Road SW11

I refer to the above planning application. As you aware, the Council has undertaken an extensive consultation exercise and has made an initial assessment of the planning application. I am now in a position to provide you with feedback on the application in a comprehensive manner, although you are already aware of many of these points.

As you know, the Council is looking for this complex development to be of the highest quality design and construction; that can act as a catalyst for the continued regeneration of Clapham Junction Town Centre; to provide a transport interchange that can accommodate existing and future capacity over and above that which Network Rail should provide and incorporates sustainability and climate change adaptation and mitigation measures. On the information received, I do not consider that officers are in a position to provide your application with a positive recommendation at the present time. There are a number of both strategic issues and points of detail that have been raised which need to be addressed before I consider that I can progress the application. I will outline the strategic issues in the body of this letter. I have set out the points of detail that need addressing in an appendix to this letter.

This letter should be read in conjunction with the Greater London Authority Stage 1 response; the English Heritage observations and the formal response from CABE.

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Director of Technical Services: William G. Myers, OBE  
Borough Planner: A G McDonald, BA (Hons) Dip TP MRTPI

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Design: From previous discussions with officers regarding this planning application, there is no in principle objection to taller buildings on this site; indeed it is considered that this site is a location in the borough that could take taller buildings.

As you are aware, CABI have made a number of criticisms of the design of the proposed development, particularly in relation to the two towers. English Heritage also does not support the proposal in respect of the effect on the historic environment. I am also aware that you have seen local objections and material regarding the height of the towers. Additional comments have been expressed about the height and positioning of the two towers, in particular that they present a single "solid" appearance when viewed as they overlap at key vantage points.

The Council does have concerns about the overall design of the taller buildings. This building will be highly visible in short and long views and will need to respond positively to each of its various different settings. At this point in time, I would just like to highlight the many concerns expressed by a number of different interested parties, including ourselves, relating to design. I think any further discussions should be at a face-to-face meeting.

You have also been made aware of concerns expressed by the Mayor and CABI in relation to the design of that part of the development fronting St John's Hill, (although you will have noted that English Heritage do not take issue in relation to this element). You have indicated that you are already considering amendments here, and I look forward to receiving your further considerations in this respect.

I would therefore ask you to consider these concerns and respond to the issues. This is probably an aspect of your application that is best dealt with at a face-to-face meeting.

Detailed Design: With regard to detailed design, I would also like to raise the following points that require further consideration;

I am particularly concerned about micro-climate, in particular that of wind and overshadowing of the proposed amenity areas including rooftop areas and the public realm at ground floor level in and around the station. In relation to wind the primary concern here relates to the mitigation measures that will be required in order to address issues of high or uncomfortable wind speed. I consider that any mitigation measures in respect of wind should be addressed at this stage to ensure the acceptability of any amenity area proposed and that any measures do not compromise the integrity of the design.

Further detail is required on how the development would integrate successfully with the Council's proposed exemplar scheme, for example the surfacing treatment of the piazza area. Discussions need to take place between yourselves, the Council and Transport for London to resolve the issues such as the relationship between functionality of the street and control mechanism for pedestrians. You are aware that further work is required on the building line of the scheme to Falcon Road, and we have discussed this point already. In addition I would draw your attention to paragraph 100 of the GLA report which is seeking a contribution to the Town Centre "Exemplar" scheme. This Council supports that request, in particular as it would directly benefit your proposal.

There is some concern that on the Grant Road side the new station entrance projects forward onto the highway and constrains the widths of the footway and carriageway. It is unclear what is proposed for the existing entrance. The pick-up/drop-off area appears very limited, considering vehicles are likely to loiter here for a little while. Further detail is required in relation to the parking compound to Grant Road, both in terms of visual representation and additional details of use.

Climate Change Adaptation and Mitigation: You were sent a copy of the assessment of the Mayor in the letter from the Greater London Authority dated 12<sup>th</sup> November and the non-compliance of this aspect of your scheme with the London Plan. The Council shares the same concern as the Mayor in this respect and fully endorses the request for further information regarding sustainable design and construction measures that are being proposed. In addition, the provision of 5% of energy from renewable sources is significantly below the Council's Core Strategy Target of 20% and needs to be substantially improved. If the policy requirement is not met, then a full report, including an examination of any discounted options, should be submitted to the Council.

You state in your application that you intend to achieve a minimum of level 3 on the Code for Sustainable Homes. For your information, the minimum acceptable from 2016 will be level 6. You will need to comply with the relevant code that is in force at the time of implementing the residential units. Also, as you are aware, the CABI/English Heritage Guidance points out in their letter, that the sustainability of such a major development, including tall buildings, should be exemplary, and it is felt that your scheme falls some way short of this at present.

The proposed BREEAM rating for the retail elements is 'very good' with an ambition to increase this to 'excellent'. This ambition to reach "excellent" is warmly welcomed by this Council. As a point of information, please confirm that the BREEAM rating applies to all commercial uses within the development.

You are advised to address the recent publication on defining zero carbon homes and non-domestic buildings <http://www.communities.gov.uk/news/corporate/1101131>. I understand that the pursuit of exemplary standards in energy efficiency for new homes can be financially rewarded through the Stamp Duty Land Tax relief for new flats.

You should also address the CABI Building for Life criteria (see <http://www.buildingforlife.org/criteria> ).

Access and Inclusive Design: You are aware of the further information requested by the Mayor in this respect. Officers from this Council fully support the Mayor's request for additional information and discussion regarding access and inclusive design. It is also a policy requirement of this Council for 10% of all residential units to be wheelchair accessible and for 100% of residential units to be of lifetime home standard.

Children's Play Space and Amenity Space: You are aware of the concerns expressed by the Mayor in relation to children's play space and I look forward to receiving the further information requested in this respect. Officers also have concerns with regard to the amount of amenity space being provided to the roof garden particularly in relation to the residential accommodation proposed. Please provide me with a clear breakdown, both in figures and on plan, of the areas allocated for restaurant and other commercial customer use, children's play space, and private and general residential amenity space. Please relate this to the Environmental Statement, in particular Section 8: Microclimate (Wind) and how the adverse effects indicated relate to the plan of amenity space, and any effects on usability thereof. This point should be cross-referenced with the information requested in the "detailed design" paragraphs of this letter.

Planning obligation package: There is considerable concern in relation to the soundness and clarity of the overall package of benefits proposed in relation to your scheme. I have received a report from the Valuation Office which raises the same concern, particularly in respect of what is included in the £39.5 million station contribution. The aspects of this £39.5 million "benefit package" that causes most concern is that significant elements are included that we do not consider public benefits as they are required in any case to facilitate your proposed development. These include the provision of the temporary station and the acquisition costs of the Windsor Castle Public House. There are other elements of the package that are debatable if they should be funded through this planning permission or funded through Network Rail via existing funding programmes. An example of this is the value of the land that you propose to make available to Network Rail in order to enable the straightening of platform 17.

My next concern relates to the non-provision of affordable housing on this site. As you are aware, it is a national, London-wide and Wandsworth policy requirement to secure affordable housing on schemes of this nature. You will see in the above paragraph that we have serious concerns about the "benefits package" as set out by yourselves. Therefore it follows that if certain substantial elements are taken out of the package that we do not consider should be there in the first place, then this is going to affect the overall viability calculations in terms of affordable housing provision. I consider that this is a significant issue concerning one of our primary policy considerations that requires a robust response.

Following on from this, an important conclusion of the Valuation Office report is that based on current market values and the benefits package that you have submitted, the scheme cannot support affordable housing at the present time. The concerns relating to the benefits package has been set out above. In relation to the information that you have submitted, the Valuation Office report does state that should permission be granted, the development would be unlikely to start in the near future and given the length of any build programme, the economic conditions are likely to be different at the end of the programme. As such it is recommended that the viability of the scheme be revisited, otherwise the profitability of the scheme may well be out of step with our policy position on affordable housing. Officers agree with the Valuation Office report that in any event, there should be a revised viability assessment at a later date (based on an updated and agreed level of the benefits package) and probably the insertion of an overage clause. I would

welcome your views on this as it will need to be reported to the Planning Applications Committee in the officer report.

In the interests of transparency and in order that Members of the Planning Applications Committee can assess for themselves the actual value of the benefits you propose as part of this scheme, the package will need to be set out with an indicative cost beside each of the Heads of Terms. This is a crucial element for Officer's and Members to properly assess, at this current time, why you are not proposing to include any affordable housing in your application. I suggest that we meet to agree "common ground" regarding what should properly be included in the headline benefits package and what are actually costs you would need to incur as part of implementing your proposal.

Transport: You are aware that concern has been expressed with regard to the role and transparency of Network Rail in respect to the package of benefits provided. I have written to Network Rail separately on this issue and I enclose a copy of this letter for your information. Whilst I have no doubt that the proposals for the station would provide significant local and regional benefits, the clarity of the funding and the specific benefits that would be provided by the development needs to be resolved. Concern has been expressed that the benefits proposed are something that should or would be funded in whole or part by Network Rail and, as such, the amount of development on the site is therefore excessive to pay for this through the planning process. This is particularly important given the competing needs of planning obligations including affordable housing.

Without further information from Network Rail being provided, it may be difficult to progress the application in a positive way if a compelling case cannot be made for the provision of railway facilities, over other public benefits, including other transport benefits, given the direct relation of those facilities to the very substantial quantum of development and the local impact proposed here. Officers will need to fully set out the "benefits package" and the position regarding Network Rail's future plans in the officer report as it forms a central part of Officers' and Member's consideration of the overall application of our policies as set out in the Core Strategy (Proposed Submission) and the Wandsworth Unitary Development Plan.

You are aware that it has been expressed from a number of quarters that it would be preferable to retain an entrance/exit to the station via the subway for the convenience of those interchanging with buses and coming to and from the town centre, in addition to the two new entrances to the overbridge. Further justification and information is therefore required for you to demonstrate a compelling case for the solution with the two new entrances to the overbridge only.

Concern has also been expressed in respect of the lack of provision of an integrated bus interchange facility. Again this is something that has already been discussed, and again, further explanation of your reasoning in this respect is required.



You are aware of the concern raised by the Mayor in relation to transport in his letter. He requires further information with regard to the level of car parking, land for transport, travel plan and delivery and servicing. One of the main issues expressed by the Mayor is that the amount of parking for the residential element is excessive. This is something that officers are willing to discuss further given the high public transport accessibility of the site. I note that you are willing to exclude residents of the development from obtaining permits for the Controlled Parking Zone. Perhaps the provision of a few spaces being provided within the basement for people with disabilities who are visiting the shopping area could be explored. I look forward to the additional information required.

Transport Assessment: Overall, it would appear that, given the large amount of residential car parking and increased commercial floorspace, the proposed development would have much more activity than the existing site, but the Transport Assessment claims there will be a lower transport impact than the existing case. The impact might well be different, given that the land uses are different, but it is hard to be confident that it will be less without more detailed justification than that provided in the TA. Please provide us this justification.

Additional points of clarification are set out in the Appendix to this letter.

Air Quality: As a result of my internal consultation, it has been suggested that the development contributes towards the provision of an Air Quality monitoring station on site to measure PM10 and NOx, with Meteorological mast to measure wind speed and direction. This would involve a one off installation cost of approximately £38,000, together with a total contribution of approximately £17,500 to pay for five years of maintenance costs and £28,861 to pay for the ratification of data, LSO site visits, display of information to website and monitoring reports etc for a five year period. Please let me have your comments in this respect.

Legal Agreement: The proposals as submitted are not yet accompanied by a suggested Heads of Terms of a Legal Agreement, although we have discussed this issue in general terms. I would therefore wish to see the potential Heads of Terms along with any accompanying detail you may wish to provide at this stage in writing. As stated earlier in this letter, I would also appreciate if you could provide an additional breakdown of the station improvements and other proposals in the £39.5 million package in a user-friendly way that could be easily understood by the public, given that this issue of clarity has been raised by a number of objectors. Given the anticipated complexity of much of the legal agreement it is considered that a contribution towards funding for officer time in monitoring the Agreement is appropriate in this case.

Consultation: As you will have read in letters on the Council website, a number of residents have asked that the developer undertakes additional consultation in the form of an exhibition including display of the model of the development. Please let me know if you wish to undertake any such consultation/exhibition.

Conservation Area Consent: Consideration of this application is integral to that for the redevelopment proposal. Whilst the 1920's Windsor Castle PH, which could be said to have some merit, its position coincides with that for the new station entrance. Therefore, if a compelling case can be made for the overall strategic objectives of the development, then these would outweigh the arguments in favour of retaining the building.

Temporary Station (2008/4492): I am also sending you a separate letter in respect of issues regarding the temporary station application. As the applications are integral to one another, the Council will need to be satisfied in respect of both applications in order that the scheme as a whole can be progressed.

I hope this letter is of some assistance. I'm sure that you'll want to reflect on the points made. I am happy to host a meeting to discuss the points raised at a date in the near future.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Hunter', with a long horizontal line extending to the right.

Mark Hunter  
Senior Planner

## APPENDIX

Detailed Design: The appearance of the elevation of the building to Platform 17 raises concern. There is no indication of how the new platform and canopy would integrate with the elevation.

Details of the frontages to the small link street to the island building should be shown. The shop frontages to the north side of the pedestrian street are only shown in part, further detail should be provided of these frontages, as well as of materials. The retail unit at the ground floor appears to have disabled access through the central door, with the left entrance door non-functional. Could you clarify the situation please? Also, give me some indication of how you anticipate signage to this unit would be displayed?

The issue of the flower kiosk will also need to be resolved.

The staircase linking the upper and lower levels of the internal street still raises concern in respect of the walled-in appearance and we still consider that the solution put forward could be improved upon. It is also considered that a central sloped area within the staircase would provide a simple solution to aid those with cycles and suitcases. You should also have seen this point among those raised by the Wandsworth Cycling Campaign. I have photographs of such design features should you require further information.

The staircase to retail adjacent to Falcon Road appears truncated. It is considered that the way the staircase truncates at the frontage could be better handled in terms of its design. One option would be for the staircase to return on itself within the width of the walkway rather than cutting into the street, to reduce the visual impact, or to wrap around the public lift, which is best left glazed for safety and security reasons.

The vehicular access to the development fronting Falcon Road gives some cause for concern. This has a very wide mouth in order to accommodate the largest service vehicles and although a central refuge has been provided it will be difficult for pedestrians to cross especially as there is restricted inter-visibility between pedestrians crossing and drivers emerging from the access road. Further detail of replacement public toilets is also required.

The wall to the south side of the new pedestrian street appears stark. If it is not possible to reduce the height, then perhaps the wall should be transformed from a solid wall to a landscaped one.

The layout in Brighton Yard appears constrained by the planting areas, particularly on the northern side, where the pedestrian route may be obstructed by opened doors of taxis etc, luggage, trolleys etc. It would appear that the northern strip of planting needs to be reduced to a few selected locations to provide more space for pedestrians. Further detail is required in respect of proposed landscaping to Brighton yard, there is some concern that there is not acceptable depth available for successful tree planting. Further details of



secure bicycle storage are also required. The Wandsworth Cycling Campaign has also raised this point.

Station Access: Further to the issue of two station entrances, rather than four, stated above, concern has been expressed that this will in future be less convenient for the majority of people, bearing in mind the assumption of a 1% p.a. increase in use of the station. The analysis of walk distances from the town centre and Falcon Road to the station in section 15.4 of the transport assessment considers only the distance to the station entrances and not the longer distances involved by having to go up onto the bridge and back down again to the platforms. I understand that this matter has been raised by my Transport colleagues and that it is being assessed.

Bus Stop Provision: As you are aware, the layout of bus stops needs further consideration, given that it is unlikely that all bus stops on St John's Hill can be amalgamated into one for each direction. The busy bus stop outside The Grand has been removed with no alternative location provided. Buses that use this stop are assumed to use the other westbound stops further down the hill, but there is concern that this would displace and concentrate bus and traffic congestion into an even more sensitive location and adversely affect the operation of the main junction at St. John's Hill and Lavender Hill.

Fifty percent of bus passengers are said to be interchanging with the station, yet interchange with the station will involve a longer walk and will be constrained by reductions in the width of the footway caused by the proposed taxi-bay and steps and wall of the shopping mall. Further consideration of width is therefore required to cater for the higher peak flows on the footway. This is an issue that I know you are discussing with my transport colleagues at the moment.

In Falcon Road you are aware that the bus stop needs to be at the northern end of the lay-by, to maximise capacity, and the shelter location also needs to remain at the northern end: the proposal to bring the building forward here and stop up a strip of highway will increase congestion on the footway. In fact the TA states that waiting conditions here "are not ideal". The pinch point on the footway of 3.5m width to the south of the lay-by caused by bringing the building forward is not considered acceptable in a very busy area approaching the main crossing points. This is a point that we have discussed already on several occasions and I know that you are continuing with my Transport colleagues. I look forward to see how this is resolved.

Transport Assessment: The section on retail/commercial trip generation (12.6) is weak and makes big assumptions which affect the overall trip generation figures, hence the implications for public transport, the highway network and the travel plan. Paragraphs 12.6.1 and 12.6.2 are somewhat contradictory, with one contending that the retail elements will be strong enough to replace the demand to travel out of the area (e.g. to Kings Road and the West End) and the other saying they would not attract inward trips (except on foot). This affects paragraphs 15.6.1-15.6.2 and leads to the conclusion that the only land use to have any impact on buses will be residential.

Para 12.6.3 in particular needs more rigorous analysis to back up the contention that the proposed non-residential uses will generate no more trips than the existing uses. Although there is a loss in 'B' use from the existing case, the amount of retail (A) space in the proposals is significantly bigger than at present - more than trebled in size to 17,719 sqm according to Table 11.1, and 17,752 sqm according to the planning application form (N.B there are some other inconsistencies between the latter and Table 11.1). One outcome of the assumption made is that 15.1.2 indicates the development generating less car-based traffic than the existing use, which seems implausible given the large number of flats and significant increase in non-residential floorspace. It would be useful for Table 11.1 to compare "proposed" floorspace for each use with "existing".

Paragraph 12.9 says there will be no car-based visitor trips for the retail elements, because there is no customer car parking. But there might be car-based trips to the town centre, generated by the new uses, with parking taking place nearby (e.g. Asda) – these trips should appear on the network.

Conclusion 19.1.6 states that traffic generated "has been shown to be less than that generated by the extant uses on the site", but this is due to the key assumptions of paragraph 12.6.

Para 12.4.5 says "it is considered that" the additional demand placed on public transport infrastructure by other committed developments is already part of TfL/Network Rail's assumed passenger growth.' However, no evidence is provided to back this up. Paragraph 15.6.2 says the impact on buses will be insignificant, but there is no evidence of TfL's view. Table 15.6 looks at the number of passengers using bus stops in the AM peak only (three hour period) but does not look at other periods (e.g. PM peak) when we know stops/waiting areas are very congested.

Rail trips (paragraph 15.8) again ignore the non-residential aspects and assume the only additional trips generated by the site would be residential trips.

The information on bus stands (para 7.3 of the TA) is incorrect. The Falcon Lane stand is disused, and route 39 has to use the Grant Road stand, contributing to congestion here and on Falcon Road. Route 239 has been replaced by an extension to route 170.

The information on train frequencies (Table 8.2) also contains inaccuracies e.g. on the Watford-Brighton corridor there is only one train per hour off-peak, not 9: the peak services also appear to be about half that stated.

The 'enhancements' listed in the summary of the TA (section 19.2) require clarification: what contributions are being made to "other rail improvements", and what improvements are proposed to real time information systems beyond those which exist in the current concourses?

Travel Plan: The section on mode split/targets (3.2) mentions the need for a travel survey after opening to establish existing travel patterns and to use this data to set a reduction target for single occupancy vehicle trips; but this is a new development and the travel

plan, TA and mitigation measures in the s106 agreement should be seeking to minimise car use from the outset. Therefore, if the TA and travel plan are working effectively, it should be very hard to *reduce* single occupancy vehicle trips after opening. It is therefore considered that a *restraint* target would be more appropriate than a reduction target. We would suggest using data from the TA to guide an initial restraint target, with this to be fixed after the full survey may be preferable to achieve this.

Regarding timings of the survey (para. 3.2.6), there should be separate trigger points and surveys for different uses (partly because it is difficult to define % occupancy otherwise, and partly because different phases of the development are likely to open at different times). For simplicity, % residential and % non-residential may be sufficient, rather than breaking the uses down any further. A suggested occupancy level of 70%, rather than 80% is preferred, reducing the risk of leaving a long limbo (70% occupancy would still mean 389 residential units occupied). In section 6.2, we would like clarification that monitoring dates will be triggered from the date of "Full" travel plan production (6.2.3) rather than "occupancy".

Paragraph 3.3.1 mentions the appointment of a travel plan co-ordinator (TPC) 3 months before first occupation, however, Officers consider that 6 months prior to first occupation may be more appropriate. Also in relation to the TPC, it is not clear how many there will be, who will appoint them, and to whom they will be responsible. Para's 4.2.1 refers to "the" TPC but 4.2.2 mentions separate TPCs for residential and retail uses. There needs to be clear lines of responsibility and a defined person to take overall responsibility for the plan. The plan should cover all uses on site and not just the residential and retail.

Paragraph 5.2.3 lists potential contents of "Welcome Home" packs. We would also seek some fiscal incentives for first occupants of residential units, e.g. £100 contribution to bicycle purchase, Oystercard (as 2 x £50 for flexible use by residents/visitors) or car club membership and use.

We welcome the proposed provision for electric vehicle recharging (5.5.3); it would be useful to give an indication of the number, their location and how the spaces will be managed.

The proposed car club provision is mentioned in the Travel Plan and also in the TA and Car Parking Management Strategy. The number of car club vehicles is welcomed and it will be important to work closely with a council-approved operator to ensure the service meets the needs of users. However, it is not clear why there is a separate proposal for a residents-only car club. In our experience (and that of car club operators we have spoken to) it is best for any car club to permit access to people in the surrounding community, as well as residents of the development. As stated in the Car Park Management Strategy (paragraph 2.1.4) the proposed car parking area for car club vehicles will be controlled and this would enable access to be restricted to residents and car club members (using their membership smartcard or code entry number sent with each booking).

It is questionable whether the provision of 18 of the car club spaces in a new parking compound on Grant Road is an appropriate replacement for the existing Streetcar and

Zipcar provision in the station car park. It would be useful to have car club operator feedback on this matter, but it seems more sensible to provide replacement facilities nearer to the existing location (serving the known existing demand from the south and east, as well as station users), rather than have a large number of spaces serving the north/west, where demonstrated existing demand is somewhat lower.

The location of cycle facilities should be set out clearly in plans, so that we can be confident that residential and staff cycle parking is secure and accessible; and that staff shower/changing/drying/locker facilities are provided.

The framework travel plan would benefit from a final section tabulating actions, timescales and responsibilities – i.e. a summary of what will happen, when, and who will ensure it happens.

There appear to be no details of the emergency exit from the station onto Falcon Road, which would be built into the railway embankment. This will need to be reconstructed by Network Rail when the track is realigned to straighten platform 17. As the latter is unlikely to be undertaken until a later date, some detail is required of the proposed situation before realignment takes place. Further information is required as to if the emergency exit would be effective, as users would be crowded in a passageway up against the side of the station and railway track that they are trying to escape from. Consideration needs to be given to if the emergency exit issued straight into the shopping mall as it does now, so that people could escape as quickly as possible.

Public Cycle Parking: There is concern that the proposed larger amount of public cycle parking in the development would appear to cater well for “station entrance” but would result in a loss of cycle parking that could be considered as “town centre” parking. Concern has also been expressed that cycle stands here are shown too close together, and again needs further detailed assessment to demonstrate that the number of cycle spaces proposed can be comfortably accommodated. The minimum spacing between hoops should be 1 metre, but TfL recommends 1.5m.

Servicing: Clarification is needed that there would be sufficient headroom within the basement areas for such as refuse vehicles which may need to tip bins overhead: the statement of a maximum clearance is imprecise. Sections are required, and also clarification of where deliveries to the station are to be undertaken e.g. food, newspapers, cash etc. We need to avoid the current problem of cash vans parking at bus stops on St John’s Hill and newsagent vans parking in Junction Approach. The proposed servicing of the Brighton Yard retail units from the highway in St John’s Hill is undesirable, and should be undertaken from the main servicing area in the basement. No indication is given as to how the large commercial unit on St John’s Hill would be serviced. Servicing from St John’s Hill would not be satisfactory. This was raised at an early stage with an indication that the servicing would be from the basement of the main development, but no such facility is indicated. Further information is also required as to how the Falcon P.H. would be serviced.