

The Springs, Springwell Lane, Harefield

in the London Borough of Hillingdon
planning application no. APP/2015/3851

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Outline planning application (with all matters reserved) for the erection of up to 122 residential units.

The applicant

The applicant is **Beeson and Sons Ltd** and the agent is **Spaced Out Ltd**.

Strategic issues

Whilst the principle of redevelopment on brownfield Green Belt land is supported in strategic planning terms, this particular proposal is not acceptable as insufficient information has been provided to make the case for the sites redevelopment and is therefore considered to be **inappropriate development** on the **Green Belt**. In addition, residential development is **not permitted** in the part of the site in **Flood Zone 3b**.

Other issues are also raised in this report with regards to **housing, affordable housing, urban design, inclusive access, sustainable development** and **transport** should be addressed to ensure compliance with London Plan policies.

Recommendation

That Hillingdon Council be advised that while the principle of development is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 73 of this report. The applicant should respond to the matters raised in this report with a view to addressing the associated strategic issues. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

Context

1 On 18 December 2015, the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D 1(a)(b) of the Mayor of London Order 2008:

- *3D 'Development (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan... and (b) which would involve the construction of a building with a floorspace of more than 1,000sq.m. or a material change in the use of such a building.*

3 Once Hillingdon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself, unless otherwise advised. In this instance, if Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 2.64 hectare site has frontage onto Springwell Lane and this road forms the southern boundary. The site is bounded by the Grand Union Canal to the east, River Colne to the west, and greenfield land to the north. A residential development is located adjacent to the site across Springwell Lane.

6 The site is classified as Green Belt land and is currently in use by industrial businesses. The existing footprint of hardstanding occupies approximately 3,500sq.m. and is comprised of existing buildings, access routes and car parking. The existing buildings are single storey apart from one small two storey unit, and occupied by a car sales yard and joinery workshop.

7 The development site is located at the north-western corner of the borough of Hillingdon, close to its boundary with Hertfordshire, which is remote from both the Transport for London Road Network (TLRN) and the Strategic Road Network (SRN), as well as any existing public transport services. As such it records a nil public transport access level (PTAL).

Details of the proposal

8 The applicant is seeking outline planning permission for the delivery of up to 122 residential units. All matters are reserved.

Case history

9 There was no pre application meeting held with GLA officers. It is understood by GLA officers that pre application meetings have been held with Hillingdon Council.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan; the Mayor's Economic Development Strategy*
- Green Belt *London Plan*
- Housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy*

- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive Access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Hillingdon Local Plan: Part 1 – Strategic policies (2012); the draft Hillingdon Local Plan: Part 2 – Site allocations and designations; the extant Saved Unitary Development Plan Policies (2007); and, 2015 the London Plan (Consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- National Planning Policy Framework and the accompanying National Planning Practice Guidance.
- The draft Minor Alterations to the London Plan (2015).

Principle of development

13 The NPPF and London Plan Policy 7.16 'Green Belt' attach great importance to the protection of Green Belt land, and state that 'inappropriate' development (i.e. uses which fall outside the exceptions within NPPF paragraphs 89 and 90) should be refused, except in very special circumstances and that development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt. Paragraph 89 of the NPPF outlines exceptions to inappropriate development, which includes 'the complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development'.

14 The NPPF defines previously developed land as land occupied by a permanent structure and includes the whole curtilage of the developed land. However, the NPPF makes clear that this does not mean the whole curtilage should be developed; it also excludes land where the remains of permanent structures have blended into the landscape.

15 The site meets the definition of previously developed land, and therefore the principle of residential development would be acceptable. However, the appropriateness of this particular scheme is dependent on the impact on openness and the extent of development in the context of the area of previously developed land. This is considered in more detail below.

Loss of industrial land

16 The London Plan promotes a rigorous approach to industrial land management to ensure sufficient stock of land and premises is provided to meet the future needs of different types of industry and related uses in different parts of London, including good quality and affordable space. London Plan Policy 4.4 'Managing industrial land and premises' promotes an evidence based approach to reconcile demand and supply of industrial land through three types of location: strategic industrial locations; locally significant industrial sites; and other industrial sites (non-designated).

17 Taking into account London Plan Policy 4.4 and guidance in the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG), sites are monitored against benchmarks to manage industrial land release. The SPG sets an indicative industrial land release benchmark for Hillingdon of 26 hectares over the period 2011-2031 with limited release of industrial land.

18 The proposed development would result in the release of non-designated industrial land. Whilst not protected under the London Plan, any loss of such industrial land needs to be carefully monitored and managed by the Council. The Council should therefore be satisfied that the quantum of industrial land released by this proposal does not undermine its wider employment capacity.

Green Belt

19 As stated above, the proposal falls within the exception of the NPPF which allows for complete redevelopment of previously developed sites, provided 'the development does not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development'. In considering the test of openness, regard should be given to the heights and spread of buildings when compared to the existing situation.

20 Very little information has been provided to support the application. The area of proposed development (assumed to be the 'pink' land as shown in the applicant's Proposed Site Layout), would appear to extend significantly beyond the area of existing buildings and hardstanding into open/undeveloped areas. In the context of the NPPF definition, officers consider that this area (i.e. the area of the site that does not include the existing buildings and hardstanding) should not be treated as previously developed land and therefore any development should be treated as inappropriate development.

21 The applicant's design and access statement indicates that the total footprint of the new building would be less than the existing hardstanding and footprint of the existing industrial buildings. However, the applicant has not provided details on how the assessment was made; in particular the area of hardstanding cannot necessarily be compared to new residential development in terms of an assessment of openness.

22 The design and access statement also states that residential buildings will be built to a height of 3.5 storeys along Springwell Lane and 2.5 storeys for the remainder of the site. The current industrial buildings are predominately one storey, with one small two storey unit. The proposal to increase the building heights could negatively impact on the openness of the Green Belt land and impact views of the land. However in the absence of any additional supporting information, it is not possible to assess what the visual impact may be.

23 Whilst the principle of redevelopment on this Green Belt land is considered acceptable, the applicant's intention to increase the spread of development and building heights comprises 'inappropriate' development in terms of the NPPF as it will impact on the openness of the Green Belt.

Very special circumstances

24 Given that the current proposal is considered 'inappropriate' development due to the proposed building heights and the spread of development, a very special circumstances case must be demonstrated in order that the scheme may be recommended as acceptable in accordance with London Plan Policy 7.16 and the NPPF.

25 The applicant has set out a number of public benefits associated with the proposal. These include:

- Removal of existing industrial uses and provision of residential accommodation.

- Removal of non-permeable existing hard standing which will reduce the risk of run-off flood water onto the highway.
- Creation of a nature reserve for wildlife.
- A permanent home for the local fishing club.
- A supply of hard standing water to (for) the nearby permanently birthed barge residents on the site's adjacent canal towpath, as well as for the general public.

26 Whilst the above is welcome and will provide some public benefit from the proposal, GLA officers are of the view that this is not enough to merit a very special circumstances case that would outweigh the impact on Green Belt land. Therefore, the development is considered to be 'inappropriate' development on the Green Belt.

Housing

27 The scheme includes up to 122 residential units, where the above Green Belt concerns could be addressed, the proposed housing provision would be supported in accordance with London Plan Policies 3.3 'Increasing Housing Supply' and 3.4 'Optimising Housing Potential'. The following sections provide additional comments regarding the supply of residential accommodation.

Housing choice

28 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing. The applicant has provided no details regarding the tenure of the residential dwellings to be provided on the site. The applicant should provide an indicative unit mix. This should take into consideration London Plan policies 3.8 and 3.11 and any identified local housing needs by Hillingdon Council.

29 London Plan Policy 3.3 'Increasing housing supply' affirms the Mayor's determination to work with relevant partners to increase London's housing supply by an average of 42,000 net additional homes to meet the need identified in the plan, enhance the environment, improve housing choice and affordability, and to provide better quality accommodation for Londoners. To achieve that figure, the London Plan has set an annual target of 559 additional dwellings in Hillingdon for the ten-year period from 2015 to 2025. Therefore the provision of additional dwellings in the proposal is supported in strategic planning terms, subject to the applicant being able to address comments made in this report.

Density

30 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within suburban location where the density matrix sets a guideline of 150 to 200 habitable rooms (or 35 to 75 units) per hectare on a site such as this where the PTAL is 0, although the London Plan notes that these ranges should not be applied mechanistically.

31 The applicant has stated that the proposal will have a density of 46 units per hectare which is within the ranges stipulated in the density matrix of the London Plan. However, the site includes a large amount of open space which works to artificially lower the density of the proposal. The applicant should agree a bespoke density calculation with Hillingdon Council to accurately reflect the density of the built environment in line with paragraph 1.3.14 of the Housing SPG.

Residential quality

32 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. As of 1 October 2015 the Government's technical housing standards came into effect. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard.

33 Currently there is no information to assess the residential quality of the development. As discussed in the urban design section below, GLA officers request an indicative site layout and a design code, in order that key benchmarks of residential quality may be secured at this stage. The design code should ensure a positive response to the design principles in the Mayor's Housing SPG and the London Plan.

Children's playspace

34 London Plan Policy 3.6 'Children and Young People's Play and Informal Recreation Facilities' seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site as a minimum.

35 The applicant should provide details regarding the strategy for the scheme's on-site play space for children as part of the design code. The design code should demonstrate that the scheme has been designed to positively respond to the requirements of the SPG and that minimum space provisions based on child yield calculations are fully met.

Affordable housing

36 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan Policy 3.11, which includes the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale.

37 While the Mayor has a set strategic investment benchmark that across the affordable rent programme as a whole rents should average 65% of market rents, this is an average investment output benchmark for this spending round and not a planning policy target to be applied to negotiations on individual schemes.

38 Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit appraisal might need to be independently verified. Paragraph 3.75 highlights the potential need to re-appraising the viability of schemes prior to implementation in order to take account of economic uncertainties and ensure the maximum public benefit is secured over the period of the development.

39 Hillingdon Council has set an overall target as required by London Plan Policy 3.11, and recommends that 35% of net new housing provision to be affordable, with a tenure mix of 70% social rented and 30% intermediate. However any departure from the London Plan policies on tenure mix should be robustly justified.

40 It is understood by GLA officers that the applicant is intending to meet Hillingdon Council's 35% requirement for affordable housing. A financial viability assessment should be undertaken to ensure that the maximum reasonable amount of affordable housing is being provided. Hillingdon Council should independently verify the applicant's viability report and both reports should be supplied to GLA officers prior to the application being referred back to the Mayor.

Urban design

41 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 7 which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4).

42 GLA officers seek the submission of an indicative site layout and a design code in order to secure key design principles and standards as part of any outline planning permission. The design code should include indicative information on architectural approach (materials/precedents) and residential quality (including individual ground floor entrances to blocks, minimum space standards, minimum floor to ceiling heights, minimum percentage of dual aspect units, wheelchair accessible/adaptable housing), as well as addressing the other specific points raised in the housing and inclusive access sections of this report.

Inclusive access

43 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

44 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The applicant's design code should provide details of how the proposal will be designed to achieve the highest standards of accessibility and inclusion.

45 In accordance with London Plan 3.8, the applicant should confirm that all units will meet the 'Lifetime Homes' standards and that 10% of the provision will be wheelchair accessible/easily adaptable. Wheelchair units should be distributed across unit sizes to afford similar choices for disabled and elderly people as non-disabled people.

46 As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4(2) and M4(3) by condition.

Sustainable development

Energy

47 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole.

48 Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Energy efficiency standards

49 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery.

50 It is recommended that dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 be undertaken for the reserved matters application. The dwellings should be designed to meet the CIBSE TM52 criteria without reliance on mechanical cooling.

51 The development is estimated to achieve a reduction of 14 tonnes per annum (9%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.

District heating

52 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant is proposing to install a site wide communal heat network.

Combined heat and power

53 The applicant has investigated the feasibility of CHP. However, due to the intermittent nature of the heat load, CHP is not proposed. This is acceptable in this instance.

Renewable energy technologies

54 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install closed loop vertical borehole ground source heat pumps to provide both space heating and hot water.

55 A reduction in regulated CO₂ emissions of 43 tonnes per annum (27%) will be achieved through this third element of the energy hierarchy.

Overall carbon savings

56 Based on the energy assessment submitted at stage I, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy.

	Total residual regulated CO₂ emissions	Regulated CO₂ emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building regulations	160		
Energy Efficiency	146	14	9%
CHP	146	0	0%
Renewable energy	103	43	27%
Total		57	36%

57 A reduction of 57 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%.

58 The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.

Flood Risk

59 The Flood Risk Assessment (FRA) prepared by Ambiental Technical Solutions confirms that the larger than one hectare site is located within Flood Zones 1, 2 and 3, though the majority of the site is within Flood Zone 3. Part of the site is also designated as Functional Floodplain (Flood Zone 3b) by Hillingdon Council. The detailed modelling with the FRA clearly shows that parts of the site are within the flood envelopes for the 1 in 5 and 1 in 20 year flood zones. The assertion within the FRA that no flooding has been recorded on the site in recent years is not sufficient evidence to conclude that the site is not within the functional floodplain. Furthermore the assertion within the FRA that the current building footprints on the site should be considered outside the functional floodplain cannot be sustained.

60 In line with the NPPF and London Plan Policy 5.12 'Flood risk management', residential development should not be permitted on Flood Zone 3b. Indeed, one of the aims of this designation (outlined in the Technical Guidance to the National Planning Policy Framework) is to "relocate existing development to land with a lower probability of flooding". In the absence of a site layout plan it is not possible to confirm if any built redevelopment would be located in the Functional Floodplain.

61 The FRA states that the site is at very low risk of surface water flooding. This is true for the majority of the site. However, Environment Agency mapping shows that the ditch linked to the River Colne (along the eastern boundary of the proposed development site and within the application boundary) is at risk of surface water flooding.

Climate change adaptation

62 Hillingdon Council should ensure that any future reserved matters application responds to strategic policies regarding climate change adaptation, including use of low energy lighting and energy efficient appliances, metering, high levels of insulation, low water use sanitary-ware and fittings, in addition to biodiverse roofs.

Transport

63 Very limited information has been submitted in support of the outline proposals, and TfL would expect a full transport assessment to be submitted as part of the reserved matters in line with TfL best practice guidance and including a multi modal trip generation assessment with public transport disseminated by mode. It is also recommended that the applicant produce a Pedestrian and Cycle Environment Review System audit (PERS and CERS) and TfL would encourage Hillingdon Council to secure appropriate walking and cycling improvements via section 106 agreements.

64 At present there are no local bus services serving this secluded rural location. Notwithstanding this policy issue, TfL considers that the size of the proposal would not warrant the introduction of any bus service, therefore no contribution is sought.

65 TfL is also satisfied that the development proposals are unlikely to have a negative impact on the capacity of Transport for London's public transport or highway networks.

66 In line with London Plan Policy 6.13, TfL expects car parking not to exceed the maximum standards and disabled parking and electric vehicle charging points in line with the London Plan standards.

67 The submitted information has not yet indicated the level of proposed cycle parking provision on site. This should be submitted for Hillingdon Council's approval as part of the reserved matters application. TfL however expects that the provision meet the latest London Plan cycle parking standards. In addition, TfL requests that 5% of cycle parking spaces be made suitable for users with adapted cycles in line with Chapter 8 of the London Cycle Design Standards (LCDS).

68 TfL expects that Hillingdon Council secure the submission and implementation of a full travel plan, to be produced in accordance with TfL's travel planning guidance, by section 106 agreements.

69 Similarly, the development should be supported by a Construction Logistics Plan (CLP) and a Delivery and Servicing Plan (DSP), in line with London Plan Policy 6.14. These plans should be secured by conditions and/or through legal agreement as appropriate and should accord with relevant TfL guidance.

Local planning authority's position

70 It is understood by GLA officers that Hillingdon Council is likely to present the application to their planning committee in March 2016.

Legal considerations

71 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

72 There are no financial considerations at this stage.

Conclusion

73 London Plan policies on Green Belt, housing, affordable housing, urban design, inclusive access, sustainable development and transport are relevant to this application. The application does not comply with the London Plan for the reasons set out below:

- **Green Belt:** The principle of redevelopment on existing brownfield Green Belt land is supported in strategic planning terms. However, whilst no illustrative material has been provided, the proposed spread of development and the proposal to build to 3.5 and 2.5 storeys will not be in accordance with the NPFF and London Plan policies as this will have a greater impact on the openness of the Green Belt than the existing development.
- **Housing:** Where the Green Belt concerns and Flood Zone issue can be resolved these matters regarding residential accommodation should be addressed to ensure compliance with the London Plan. The applicant should undertake a bespoke density calculation to accurately assess the density of the proposal. A design code should be submitted in order to secure key benchmarks of residential quality. The design code should include details of the on-site play strategy.

- **Affordable housing:** The applicant should submit a financial viability appraisal to determine that the proposal is providing the maximum reasonable amount of affordable housing. Hillingdon Council should have this independently verified and the results shared with GLA officers.
- **Urban design:** GLA officers require the applicant to submit an indicative site layout and a design code in order to secure key design principles and standards as part of any outline planning permission. Indicative information should be included regarding architectural approach, residential quality and layout.
- **Inclusive access:** The applicant is encouraged to establish key inclusive design principles for reserved matters as part of a design code. The applicant should confirm that all residential units will be designed to meet lifetime homes standards and that 10% will be wheelchair accessible/easily adaptable. The Council should secure compliance with building regulations M4(2) and M4(3) via condition.
- **Sustainable development:** The parts of the redevelopment in the Functional Floodplain would not be acceptable. The applicant should provide an indicative site plan to confirm the likely impact on flooding. Further revisions and information (detailed in the body of this report) are required regarding the energy strategy, before the proposals can be considered acceptable and the carbon dioxide savings verified. The Council is also encouraged to secure the proposed climate change adaptation measures by way of planning condition in accordance with London Plan Policies 5.10, 5.11 and 5.13.
- **Transport:** Whilst the proposal is generally acceptable in strategic transport terms, the applicant should address the matters raised within this report with regards to provision of a transport assessment for any reserved matters application; parking; cycle parking; and, plans.

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