

Hounslow town centre car park, Bath Road

in the London Borough of Hounslow

planning application no. P/2015/5418

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

Development for a new civic centre, incorporating office accommodation and associated civic facilities, public library and registrar, associated car parking facilities, access and public realm and footway improvements.

The applicant

The applicant is **BY Development Ltd.**, and the architect is **Sheppard Robson**.

Strategic issues

The proposed **social infrastructure** is **strongly supported**, and would provide a compact and **sustainable civic centre** for Hounslow town centre, enriched with **community use**.

Delivery of this scheme would also allow Hounslow's **existing civic centre site** to be **released for residential-led redevelopment** in support of **Hounslow Housing Zone** objectives.

Hounslow Council and the applicant should, nevertheless, ensure that the matters raised in this report with respect to **inclusive access, sustainable development** and **transport** are addressed prior to the Mayor's decision making stage.

Recommendation

That Hounslow Council be advised that whilst the scheme is broadly supported in strategic planning terms the application does not yet fully comply with the London Plan for the reasons set out in paragraph 51 of this report. The resolution of those matters could, nevertheless, lead to the application becoming compliant with the London Plan.

Context

1 On 25 January 2016 the Mayor of London received documents from Hounslow 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 has until 26 February 2016 to 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 the following categories of the Schedule to the Order 2008:

- 1B 1.(c) *“Development... which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres”*; and,
- 1C 1.(c) *“Development which comprises or includes the erection of a building of... more than 30 metres high and is outside the City of London”*.

3 Once Hounslow 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.

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 Bath Road car park site is approximately 0.38 hectares in size, and is located at the junction between Bath Road and Lampton Road. The site is in the western portion of Hounslow town centre (on the outside edge of the Hounslow Housing Zone), and provides up to 120 surface car parking spaces for public use, as well as a bus stand (which has space for three buses). The context to the site is dominated by town centre uses (including ground floor A-class uses and mid-rise office blocks), however, adjacent to the west of the site is a single-storey gospel hall and a short terrace of two-storey houses which have been converted for commercial uses.

6 The site contains no heritage assets and is not within a Conservation Area. However, 44-50 Bath Road (opposite the site to the southwest) is Grade II Listed. Furthermore, Yates public house (on an island site adjacent to the east of the site) is Locally Listed.

7 The site is approximately 300 metres south of Hounslow Central Underground station - which is served by Piccadilly line services towards central London, Harrow and Uxbridge, and Heathrow Airport. The site is served by three nearby bus stops providing access to 13 bus routes to a variety of destinations. Hounslow mainline station, offering rail services to London Waterloo is located approximately 850 metres from the site. Overall, the site registers a Public Transport Accessibility Level of six(a), on a scale of one to six(b), where six denotes the most accessible locations in the capital.

Details of the proposal

8 The proposal is for redevelopment of a town centre surface car park to provide a new 16,070 sq.m. (GIA) civic centre building (seven-storeys plus plant) for Hounslow Council, incorporating office accommodation and associated civic facilities including public library, registrar, cafe, landscaping and parking.

9 This application has been submitted in tandem with application P/2015/5505 for residential-led redevelopment of Hounslow Council’s existing civic centre site at Lampton Road (refer to GLA planning report D&P/3795/01).

Case history

10 On 12 November 2015 a pre-planning application meeting was held at City Hall to discuss this proposal. The advice issued by GLA officers stated that the proposal to redevelop a

town centre car park to deliver a compact and energy efficient civic centre (enriched by community use), is strongly supported in strategic planning terms. The applicant was, nevertheless, advised to ensure that the submitted application addresses various detailed matters with respect to: urban design; inclusive access; sustainable development; and, transport.

Strategic planning issues and relevant policies and guidance

11 The relevant strategic issues and corresponding policies are as follows:

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|---------------------------|---|
| • Social infrastructure | <i>London Plan;</i> |
| • Urban design | <i>London Plan; draft Shaping Neighbourhoods: Character and Context SPG;</i> |
| • Inclusive access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Sustainable development | <i>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; Mayor's Ambient Noise Strategy;</i> |
| • Transport and parking | <i>London Plan; the Mayor's Transport Strategy;</i> |
| • Crossrail | <i>London Plan; and, Mayoral Community Infrastructure Levy.</i> |

12 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 2015 Hounslow Local Plan; and, the 2015 London Plan (Consolidated with Alterations since 2011).

13 The following are also relevant material considerations:

- National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance;
- Draft Minor Alterations to the London Plan 2015; and,
- Hounslow Planning Brief for Bath Road Car Park.

Principle of development

14 The site is currently a town centre surface car park, which is capable of providing approximately 120 parking spaces for public use. The site also provides a bus stand which can accommodate up to three buses. The information available indicates that the car park has an average occupancy level of 42%, and that other town centre car parking spaces could address the need arising from the proposed loss at this site. Noting this, the excellent public transport accessibility level of the area generally, and the proposed off-site reprovision of the bus stand (refer to the transport section below), GLA officers strongly support the proposed development of this prominent town centre site for civic accommodation and related uses. It is further noted that the delivery of this scheme would release Hounslow's existing civic centre site at Lampton Road for residential-led redevelopment in support of London Plan Policy 3.3 and strategic objectives for the Hounslow Housing Zone (refer to GLA report D&P/3795/01).

Social infrastructure (civic centre)

15 This scheme essentially seeks to accommodate the civic functions that are proposed to be displaced from the current Hounslow Council civic centre on Lampton Road (refer to GLA report D&P/3795/01). The existing civic centre provides 28,879 sq.m. of gross internal floorspace (including office space and a conference centre) – set within a landscaped 5.3 hectare campus with extensive car parking. When considering the proposed re-provision at this site, GLA officers have

treated the civic centre as social infrastructure. Therefore, London Plan Policy 3.16 is relevant in this case.

16 The proposal would provide a town centre civic centre of a considerably smaller footprint than that at Lampton Road. Moreover, at 16,070 sq.m. (gross internal area), the proposed civic centre floorspace is just over half that of the existing provision. However, GLA officers understand that through design efficiencies, higher employee densities, and the provision of multifunctional spaces, it is possible for the scheme to accommodate all of the existing functions currently taking place at Lampton Road. In addition, the new building is also proposed to accommodate a public library and cafe, which, when grouped together with other public-facing civic functions, would help to form a vibrant community hub within the scheme. The proposed civic centre would also be considerably more energy efficient than the existing Lampton Road buildings, and would promote a shift to more sustainable modes of travel through considerably reduced car parking provision.

17 Due to the intelligent design and inherent space efficiencies of the proposal (which ensure that existing civic functions would be maintained), the net loss of civic centre floorspace does not raise a strategic concern. Furthermore, noting the proposed multiple use of the facility for civic and community uses, and the benefits of releasing the Lampton Road civic centre site for residential-led redevelopment, GLA officers strongly support the proposed civic centre office development in accordance with London Plan Policy 3.16.

Urban design

18 The proposed layout of the scheme is broadly supported, and it is noted that the architect has responded well the contextual sensitivities and spatial constraints of the site in order to accommodate the floorspace and use requirements of the new civic centre, and to provide an optimised provision of public realm.

19 In particular, the provision of a defined area of public realm at the junction of Bath Road and Lampton Road (stretching northwards towards to the building's principal Lampton Road entrance) is supported. Whilst it is noted that there would be a relative pinch point in the public realm further north (between the building line and Lampton Road at the north east corner of the site), it is noted that pavement widths would not be less than two metres, and that this is consistent with the existing situation at this part of the site. More generally, the landscaping proposals suggest that a high quality and inclusive pedestrian environment would be achieved for the scheme, in conjunction with well-integrated resilience measures. Moreover, in response to pre-application advice, GLA officers strongly support the extension of the application redline boundary northwards, to include a triangle site currently used as an informal car park. Subject to being acquired, this would form an extension to the proposed public realm – providing an opportunity to provide a new town centre pocket park, and greatly enhancing the setting for the civic centre in views from the north.

20 The general internal arrangement of the proposed building is broadly supported in strategic planning terms – with on-site servicing/vehicular access well-handled off Bath Road, and a continuous run of active frontage provided at the key public facing edges of the building. The main entrance is well defined and the majority of the ground floor is given over to a public lobby with library, cafe and meeting space. This will contribute to an active and welcoming community environment, which in turn will help to animate the public realm. The inclusion of multi-level voids at the edges of the building also supports good levels of daylight penetration into office spaces and would contribute further to the interest and animation of the streetscape.

21 The proposed building is 31.5 metres tall (seven-storeys, plus screened plant), and would generally be seen in the context of various other largescale town centre buildings such as 230-

236 High Street (37 metres tall) and Central House (22.5 metres tall) to the east, and Trinity Square (34 metres tall) to the south. Nevertheless, the location of the site (at the western edge of the town centre) and the generally low-rise character of development fronting this part of Bath Road, means that there would be a noticeable difference in scale between the proposal and existing development in its immediate setting (including the single storey gospel Hall, Locally Listed Yates public house and Grade II Listed 44-50 Bath Road). However, having considered the varied character of the town centre context (and having had special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess), GLA officers are of the view that the proposed change in scale would not cause harm to the character of the town centre, or the setting of the aforementioned heritage assets. Indeed, GLA officers are of the view that the proposed infilling of this underused site with a well-designed and well-activated building (with high quality public realm) would significantly enhance the character of the town centre in townscape terms. Moreover, the proposed scale and distinctive architectural appearance of the building (refer below) would create a new and iconic civic landmark for Hounslow town centre.

22 The building is proposed to be clad in a metal skin with deep window reveals. This contributes to a distinctive appearance, but also offers practical solar shading (as a key component of the energy strategy). The overall approach to the building treatment provides a regular framework pattern, whilst offering interest through the use of areas of multi-level voids, and a degree of textural variation within and between elevations. The proposed approach is distinctive and supported by GLA officers. Hounslow Council is expected to secure detailed approval of materials by way of planning condition.

Inclusive access

23 The applicant has set out its response to access and inclusion within the design and access statement. It is noted that this proposal offers an important opportunity to deliver fully inclusive employment opportunities and public services for Hounslow town centre. The inclusion of a library and cafe (as well as opportunities for the community use of other space within the building) will also help to ensure that this building would become an inviting and well used asset for the community.

24 Based on the submitted plans it is evident that the principles of access and inclusion have been well considered: a good provision of accessible parking spaces has been made (close to lift cores); the building entrance is legible and provides an inclusive (and energy efficient) alternative to revolving doors; and, floorplate layouts are efficient whilst providing suitably generous circulation and break out space. In particular, GLA officers welcome the inclusion of a publically accessible changing places WC at the ground floor.

25 The design of the landscaping and public realm is also generally well resolved. However, whilst the design and access statement acknowledges the need to give careful consideration to the design of shared surface areas, GLA officers seek to ensure that the basement entrance area at the Bath Road frontage is clearly identified by tactile boundaries. Accordingly, the Council is encouraged to secure approval of these landscaping details by way of planning condition.

Sustainable development

Energy strategy

26 For the purposes of assessing applications against the carbon dioxide savings target within London Plan Policy 5.2, the Mayor now applies a 35% reduction target beyond Part L 2013 of Building Regulations. In accordance with the principles of Policy 5.2 the applicant has

submitted an energy statement for the proposed scheme, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (comprising a range of passive design features and demand reduction measures); an air source heat pump (ASHP) to provide site-wide space heating and cooling; and, a photovoltaic array. The energy statement indicates that the strategy would achieve the 35% target. This carbon dioxide saving is supported in principle. However, GLA officers are seeking a number of detailed clarifications from the applicant team, and in particular, further discussion on the ASHP approach in the context of the wider strategy and the London Plan energy hierarchy. GLA officers will provide an update at the Mayor's decision making stage, following the conclusion of these discussions.

Climate change adaptation

27 The proposed landscaping strategy offers various opportunities for urban greening and ecological enhancements for the site through biodiverse planting and landscaping within the public realm. This is strongly supported in accordance with London Plan policies 5.10, 5.11 and 7.19. These proposals, and the various sustainable urban drainage measures identified within the submitted flood risk assessment, are strongly supported. In accordance with London Plan policies 5.10, 5.11 and 5.13 the Council is encouraged to secure detailed approval of these climate change adaptation measures by way of planning condition.

Transport

Site access

28 The primary vehicular access for the site is proposed from Bath Road, providing access to the basement car park. Swept path analysis has been provided as part of the transport assessment and barriers will be set back so that two cars can queue off the highway. It is important that the detailed design of the access takes into account the potential for conflicts between turning vehicles and other road users including buses and cyclists. A secondary access for servicing vehicles is proposed from Bulstrode Road to the north of the site.

29 Cycle access to the site will be available via three accesses, including the vehicular accesses on Bath Road and Bulstrode Road. A marked route for cyclists through the servicing area will be provided to minimise conflicts. This will need to be strictly enforced, and access for any large vehicles expected to cross over into the marked route for cyclists will need to be supervised.

30 The applicant is proposing to relocate the current bus stand (which has space for three buses) from this site to Steve Biko Way, just to the west of the site where up to four buses can be accommodated. TfL has no objection to this proposal in principle. The detailed design of bus standing provision will, nevertheless, need to be agreed with TfL prior to commencement, and TfL will require a condition to be attached to any permission requiring the new bus standing to be approved and delivered to TfL's specification - prior to the removal of the existing standing spaces. It is important that there is no disruption to bus services during the transition. The full cost of relocation will need to be met by the applicant. Dialogue is already underway between the applicant and TfL London Buses on this issue.

Trip generation and impact assessment

31 The selected surveys from the 'TRICS' database are acceptable to TfL. A highways capacity assessment has been carried out using spreadsheet modelling for the baseline (2015), opening (2018) and five years later (2023). 'PICADY' has been used to assess the operation of the proposed primary vehicular access off Bath Road, and to compare this with the existing main

car park access. However, there has been no assessment of the wider area due to the anticipated reduction in vehicle trips. The site access modelling indicates that there should be a positive impact on capacity and queuing at the junction.

32 However, this spreadsheet modelling was based on a predicted mode split for car travel of 10%. By contrast the staff survey quoted in the travel plan indicates a current mode share for car travel to the existing site (including passengers) of 58% and this would only reduce to 49% by 2023 despite the small amount of car parking being provided at the new site. These figures cast doubt on the reliability of the mode share projections used in the modelling. Following comments made by TfL, it is understood that a revision to the travel plan is being prepared, with more ambitious mode split targets. This will be reviewed and a view taken on whether any additional highway assessment or modelling is required.

33 Although a highways capacity assessment has been carried out, there has been no equivalent for public transport despite the increase in public transport trips anticipated as a result of the development. A net impact for all forms of public transport trips should be carried out. Public transport trips must be broken down by mode and direction, including splitting rail and underground trips. The relocation of the civic centre to the proposed town centre location combined with the substantial reduction in staff parking has the potential to significantly change bus use patterns in the area. Once the net trip generation split by mode and direction has been provided, TfL will be able to confirm whether any public transport capacity mitigation will be required. It is understood that this will be produced at the same time as the revised travel plan.

Car parking

34 The applicant proposes 43 car parking spaces, including 12 Blue Badge bays; plus two bays for light vans. This is in accordance with London Plan standards for B1 office use and is supported by TfL. However, it represents a considerable reduction from the existing civic centre parking provision (approximately 590 spaces). This would, therefore, require a significant shift in travel behaviour following the proposed relocation (which may initially prove challenging). In view of this (and in the context of the highway capacity assessment) TfL seeks confirmation that staff will not be given free or discounted access to other town centre car parks, or local parking permits, following the relocation. Clearly any such allowance would risk undermining the conclusions of the highway capacity assessment (which assumes only 10% travel by private vehicle). It is understood that further information on this point will be provided as part of the revised travel plan.

35 A car park management plan will need to be prepared and secured as part of any permission, including details of how on and off-site car parking will be controlled, allocated and managed to prevent misuse and to minimise impact on the highway network. TfL notes that the applicant has agreed to this, and supports the fact that the proportion of Blue Badge parking and the number of electric vehicle charging points will comply with the minimum standards in the London Plan.

Cycling

36 In terms of on-site cycle parking, 106 secure long stay spaces and 46 short stay visitor spaces are proposed, in accordance with London Plan minimum standards. Storage units for folding cycles and showering, changing and drying facilities for cyclists will also be provided. These proposals for cycle parking are welcomed. It is anticipated that long stay cycle parking for staff will be double stacked - so it is important that mechanical or pneumatic assisted lifting to the upper level is incorporated in the design. Provision should also be made for adapted cycles.

TfL recommends that Chapter 8 of the London Cycle Design Standards is referred to in the detailed design of cycle parking <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>.

37 A toucan crossing at the junction between Lampton Road and Bath Road is proposed to replace the existing pedestrian crossing. The cycle route will be integrated with public realm improvements. This is acceptable to TfL in principle and should improve the route for cyclists to the town centre. TfL will, nevertheless, need to review the detailed proposals for the crossing and associated public realm improvements to assess the impact on the Strategic Road Network.

Walking

38 As requested, a 'PERS' style audit of the pedestrian environment has been undertaken which has focussed on key routes to and from local amenities and public transport provision. The audit is welcomed but the transport assessment or revised travel plan will need to set out proposed mitigation to remedy the identified deficiencies. Details of improvements proposed by Hounslow Council will be provided to TfL and may go some way to addressing issues raised by the audit. Any outstanding areas identified in the audit will need to be addressed through conditions or a separate legal agreement.

Travel planning

39 Further to the comments above, and taking account of the reduction in on-site car parking, TfL is of the view that the travel plan should be more ambitious in setting targets to achieve modal shift. Use of town centre car parks by civic centre staff will also need to be discouraged. TfL would welcome in introduction of a series of measures, with immediate effect, to ensure that during decantation and by the time of relocation in 2018, car use is consistent with the proposed low level of on-site parking at Bath Road. Positive measures should include the establishment of an on-site car club/staff car pool and car sharing arrangements. Enforcement measures will also be needed to ensure that overspill parking is minimised.

40 Staff postcode data should be used to target initiatives and information through a personalised travel planning initiative in order to achieve the necessary mode shift. Useful lessons may be learned from similar schemes including Brent and Bexley Civic Centres.

41 Following discussions with the applicant it is understood that the travel plan is currently being revised to include more challenging targets and the measures to achieve them. TfL looks forward to reviewing the revised document in due course.

Delivery and servicing plan (DSP)

42 Servicing and delivery for the proposed development will take place via Bulstrode Road, in an off-street servicing area. This provision is welcomed by TfL although the on-site servicing area will need to be managed carefully (particularly when there are multiple deliveries, or a need for access by large vehicles), because it also provides access for cyclists.

43 The final DSP should be secured by condition, to be approved prior to occupation and should be prepared in accordance with TfL guidance <http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>.

Construction logistics plan (CLP)

44 The site is within a busy town centre location. An initial construction management plan has been submitted as part of the application and provides details of numbers of vehicles,

phasing, access and local transport impacts. A finalised CLP will need to be secured by condition. Particular factors to consider include minimising any potential conflicts with other road users including buses, pedestrians and cyclists.

45 TfL guidance (<http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf>) should be referred to in preparation of the CLP and construction vehicles should be routed via the A4, avoiding Hounslow town centre. The applicant has committed to provide a detailed CLP as part of the construction management plan before the application is determined.

Mayoral Community Infrastructure Levy

46 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1 April 2012. All new developments that create 100 sq.m. or more additional floorspace are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in the London Borough of Hounslow.

Local planning authority's position

47 Hounslow Council strongly supports this scheme in principle, and is expected to formally consider this application at a planning committee meeting in March 2016.

Legal considerations

48 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, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected 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.

49 In accordance with his statutory duty in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Mayor shall have special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess.

Financial considerations

50 There are no financial considerations at this stage.

Conclusion

51 London Plan policies on social infrastructure, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan, as set out below:

- **Principle of development:** GLA officers strongly support the proposed development of this prominent yet under used town centre site for civic accommodation and related uses. It is further noted that the delivery of this scheme would release Hounslow's existing civic centre site at Lampton Road for residential-led redevelopment in support of London Plan Policy 3.3 and strategic objectives for the Hounslow Housing Zone.
- **Social infrastructure:** Through intelligent design and inherent space efficiencies, the proposal would ensure that existing civic functions at Lampton Road could be maintained at this compact and sustainable town centre site. Furthermore, noting the proposed multiple use of the facility for civic and community uses, and the benefits of releasing the Lampton Road civic centre site for residential-led redevelopment, GLA officers strongly support the proposal in accordance with London Plan Policy 3.16.
- **Urban design:** The layout of the proposal is well considered, and the proposed infilling of this underused site with a well-designed and well-activated building (with high quality public realm) would significantly enhance the character of the town centre in townscape terms. GLA officers support the design of the scheme which would become a new civic landmark in Hounslow town centre. Accordingly the application complies with London Plan Policy 7.1.
- **Inclusive access:** The approach to access and inclusion is broadly supported in accordance with London Plan Policy 7.2. The Council is, nevertheless, encouraged to secure detailed approval of landscaping matters by way of planning condition.
- **Sustainable development:** The proposed carbon dioxide savings and climate change adaptation measures are broadly supported in strategic planning terms. Following the conclusion of discussions on the energy strategy, the Council is encouraged to secure associated energy and adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.11, 5.13 and 7.19.
- **Transport:** Whilst the application is generally acceptable in strategic transport terms, the applicant should address the matters raised with respect to: site access; trip generation and impact assessment; car parking; cycling; walking; travel planning; delivery and servicing plan; and, construction logistics plan to ensure accordance with London Plan policies 6.3, 6.9, 6.10, 6.13 and 6.14.

52 The resolution of the issues above could lead to the application becoming compliant with the London Plan.

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