

Calverley Close, Beckenham

Local Planning Authority: Bromley

Local Planning Authority reference: 22/03013/FULL1

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

Demolition of existing buildings and phased redevelopment comprising of 275 residential homes in buildings ranging from 3 to 7 storeys. Associated landscaping, car and cycle parking and ancillary development.

The applicant

The applicant is **Bromley Regeneration (Calverley Close) LLP** and the architect is **HTA Design**.

Strategic issues summary

Land use principles: The proposal would comply with the Mayor's key principles for estate regeneration set out in the London Plan and GPGER. The uplift in housing is supported and GLA officers could accept the re-provision of the former sheltered accommodation units as regular affordable housing, subject to consideration of the Council's assessment of the rehousing arrangements at Stage II.

Housing: The application would provide an uplift in affordable housing when measured by floorspace and habitable rooms. The proposal will need to follow the Viability Tested Route and GLA officers are currently scrutinising the information submitted.

Urban design and heritage: GLA officers are broadly supportive of the design in terms of the built form and residential quality. The applicant should address comments in relation to site layout and public realm, along with comments in relation to fire safety and inclusive design. The development would result in less than substantial harm to heritage assets that would need to be weighed against the public benefits of the proposal.

Transport: The applicant should address comments in relation to healthy streets, vehicle access, car and cycle parking, transport network impacts and deliveries and servicing. Contributions towards healthy streets and infrastructure improvements along with other key details should be secured.

Other issues on **equality, sustainable development** and **the environment** also require resolution prior to the Mayor's decision making stage.

Recommendation

That Bromley Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 120. Possible remedies set out in this report could address these deficiencies.

Context

1. On 25 August 2022 the Mayor of London received documents from Bromley 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 the following Category/categories of the Schedule to the Order 2008:
 - Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats";
 - Category 1B: "Development (other than development which only comprises the provision of houses, flats, or houses and flats) 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
 - Category 3A: "Development which is likely to— (a) result in the loss of more than 200 houses, flats, or houses and flats (irrespective of whether the development would entail also the provision of new houses or flats)."
3. Once Bromley 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's public register: <https://planning.london.gov.uk/pr/s/>

Site description

5. The proposal relates to an approximately 2.4-hectare site which is located on the east side of Southend Road and adjacent to Beckenham Place Park. The site is occupied by the Calverley Close Estate and currently comprises six blocks ranging in height between three and four storeys. The Estate accommodates 163 social rented units and Warner House, which provided 40 specialist accommodation units (Use Class C3) and 1 general needs unit and was decommissioned in 2016. The buildings themselves are set well back from Southend Road itself by informal lawned areas. Parking is provided in the form of garages, and both off and on street parking. The surrounding area predominantly consists of relatively low-density housing between 2–4 storeys although three 10- storey towers are located to the west within the Porchester Mead development.
6. In terms of relevant land use designations, the Beckenham Place Conservation Area directly adjoins to the east and contains the Grade II* listed Beckenham

Place Mansion and Grade II listed stable block, outbuildings and garden walls to Beckenham Place. The park is also designated Metropolitan Open Land (MOL) and a Site of Importance for Nature Conservation (SINC). The site's boundary with Beckenham Place Park also marks Bromley's boundary with the London Borough of Lewisham.

7. The site is accessed from A2015 Southend Road, which is a borough road but forms part of the Strategic Road Network (SRN) for which TfL is the traffic authority. The site has a public transport accessibility level rating ranging from 1b to 2 based on buses alone, on a scale between 0-6b. The site is served by bus route 54 running along Southend Road with stops adjacent to and opposite the site. Two other services are within reasonable walking distance (640m). There is one rail station (Beckenham Hill) within a reasonable walking distance and four additional rail stations which are just outside the reasonable walking distance of 960m: Lower Sydenham, Beckenham Junction, New Beckenham, and Ravensbourne. However, this assessment does not take account of the number of existing pedestrian-only routes and private highways in the area nor the development proposals themselves which will increase permeability of the site. Therefore, it is expected that all of the site would have a PTAL of at least 2.

Details of this proposal

8. The proposal involves the phased redevelopment of the existing Calverley Close Estate to deliver 275 new residential units, including the re-provision of 179 affordable units (of which 136 are currently occupied) and 96 private units. The development would be within 9 blocks between 3 – 7 storeys, including 20 three storey town houses within the northern part of the site.
9. 136 of the units will be provided at social rent tenancies for existing residents returning to the estate, whilst the remaining 43 homes would be provided as London Affordable Rent.
10. The proposal also includes landscaping, on-site parking (125 car parking spaces, including 9 blue badge spaces), cycle, play and communal amenity space provision. Three vehicular access points along with the creation of new pedestrian accesses would be provided from Southend Road.

Case history

11. There is no strategic planning history relevant to the site apart from pre-application discussions.
12. On 10 December 2021, a pre-planning application meeting to discuss the proposal to develop Calverley Close Estate was held virtually and a preliminary response was then issued on 7 February 2022. GLA officers set out that the redevelopment of the housing estate and uplift in residential units is supported in principle subject to the proposal delivering full compliance with the Mayor's Estate Regeneration Best Practice Guidance and Affordable Housing Viability SPG. The applicant was advised to ensure that acceptable affordable housing

reprovision is delivered and that further information is provided with regards to Warner House and housing provision. GLA officers set out that further design improvements to the scheme should be incorporated and other matters in relation to heritage, sustainability, transport and environmental considerations must also be addressed as the development progresses to ensure compliance with the London Plan.

13. A pre-application meeting for a redevelopment proposal of the estate was also held on 26 September 2017. The proposal has evolved since a previous pre-application response issued 30 October 2017 (4358/01) for the redevelopment of the site to provide approximately 400 residential units within four blocks ranging in height up to ten storeys.

Strategic planning issues and relevant policies and guidance

14. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Bromley Local Plan (2019); and, the London Plan 2021.
15. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - The National Design Guide;
 - The Mayor's Good Practice Guidance to Estate Regeneration (2018); and
 - On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#).
16. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Good Growth - London Plan;
 - Regeneration Area - London Plan; the Mayor's Economic Development Strategy;
 - Estate regeneration - London Plan; Affordable Housing & Viability SPG; Mayor's Good Practice Guide to Estate Regeneration;
 - Housing and affordable housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Housing Design Standards draft LPG; Play and Informal

Recreation SPG; Character and Context SPG; Affordable Housing and Viability SPG;

- Specialist accommodation – London Plan;
- Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy draft LPG; Optimising Site Capacity: A Design-Led Approach draft LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG;
- Fire Safety – London Plan; Fire Safety draft LPG;
- Heritage - London Plan;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;
- Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy;
- Transport and parking - London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG; and
- Green Infrastructure - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor draft LPG.

Land use principles

Loss of specialist accommodation

17. London Policy H13 applies to specialist older persons housing and identifies that boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of local housing needs (including Bromley's annual borough benchmarks for specialist older persons housing - 210 units per annum), the need for sites to be well-connected and the increasing need for accommodation suitable for people with dementia. Furthermore, Bromley Local Plan Policy P11 states that proposals involving the loss of sites currently providing specialist accommodation will be resisted unless:
 - a. it can be demonstrated that there is no demand for the existing accommodation and no demand for sites from alternative providers, or
 - b. there is equal or greater replacement provision of improved specialist accommodation in an alternative appropriate location.

18. Furthermore, London Plan Policy H8 applies to specialist forms of accommodation. It states that the loss of supported accommodation that meets an identified housing need should be satisfactorily re-provided to an equivalent or better standard.
19. Warner House within the northern end of the site was decommissioned in 2016 and consists of 40 vacant sheltered housing units (clarified by the Council as Use Class C3). The development would not fully comply with Policy H8, as the sheltered accommodation is not being re-provided on site.
20. Whilst strategic policy requires the on-site re-provision of the 40 units, GLA officers recognise that the applicant has undertaken a marketing exercise in relation to Warner House in discussion with LB Bromley officers to meet the requirements of Part A of Local Policy P11 to demonstrate whether there is a need for the re-provision of specialist older persons accommodation on-site. The applicant sets out that there is no existing demand for the accommodation and no expressions of interest were received. A marketing report has been provided within the submission. In addition, at pre-application stage the applicant provided further information confirming the decision taken in liaison with the Council on the decant plan and rehousing arrangements for Warner House.
21. On the basis that the local policy requirements described above are met, and the Council are satisfied with the rehousing arrangements that have been agreed, GLA officers could, on balance, accept the re-provision of the 40 Warner House units as regular affordable housing (Use Class C3). In line with Policy H8 replacement of the existing units should be sought at equivalent affordability levels, however compliance with this requirement can be made through habitable room and floorspace as appropriate to respond to local need and site-specific circumstances.
22. The applicant sets out that affordable housing would be re-provided by floorspace and habitable rooms, and that the quantum of affordable units (179 units) aligns with housing need based on a housing needs assessment undertaken prior to application submission. The applicant identifies that there would be an increase in the quantum of affordable housing floorspace from 16,783 sq.m to 18,623 sq.m along with an increase in affordable habitable rooms from 527 to 605 habitable rooms. Accordingly, GLA officers could accept the re-provision of the Warner House units as stated above in this instance. The Council's assessment of the rehousing arrangements will also be considered and reported to the Mayor at Stage II.

Increasing housing supply

23. The London Plan identifies the optimisation of land as a key part of the strategy for delivering additional homes in London. Policy H1 of the London Plan sets out a 10- year target of 7,740 homes for the London Borough of Bromley between 2019-2029 and identifies that housing delivery should be prioritised on suitable and available brownfield sites, including those which are located within 800 metres of a station. The proposed redevelopment would deliver additional

homes along with improvements to the existing housing stock in a location that also meets the criteria specified in Policy H1 as a preferred source of capacity. Accordingly, the proposal is supported in accordance with London Plan Policy H1.

Estate regeneration

24. The proposal is subject to strategic policies and planning guidance relating to the replacement of existing housing and estate regeneration, which are set out within Policy H8 of the London Plan. Further guidance is also provided in the Mayor's Affordable Housing and Viability SPG and the Mayor's Good Practice Guide to Estate Regeneration (GPGER).
25. Policy H8 of the London Plan seeks to resist the loss of housing, including affordable housing, unless it is replaced at existing or higher densities with at least equivalent floorspace. The Mayor's Affordable Housing and Viability SPG and Policy H8 also make it clear that, with applications relating to housing estate renewal, schemes are required to ensure that existing affordable housing is replaced on an equivalent basis. Policy H8 states that before considering the demolition and replacement of affordable homes, alternative options should first be considered and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts. The policy also seeks that replacement affordable housing is integrated into the development to ensure mixed and inclusive communities.
26. In addition, all estate regeneration schemes should take into account and reflect the following key principles set out in the GPGER which apply to all estate regeneration schemes in London:
 - an increase in affordable housing, comprising like-for-like replacement of existing affordable units and the maximisation of additional genuinely affordable housing;
 - full rights to return or remain for social tenants;
 - full and transparent consultation, with identified direct engagement and consultation events; and,
 - a residential ballot is required if the total number of new homes is greater than 150 units and the application benefits from GLA funding.

Full and transparent consultation

27. The London Plan and GPGER sets out the Mayor's aspirations for full and transparent consultation and meaningful ongoing involvement with estate residents throughout the regeneration process to ensure resident support. The Mayor also requires any landlord seeking GLA funding for estate regeneration projects which involve the demolition of existing affordable or leasehold homes to demonstrate that they have secured resident support for their proposals through a ballot.

28. The planning application sets out information demonstrating consultation with residents through a variety of formats from June 2021 to July 2022 (documented within the applicant's Statement of Community Involvement). The applicant also sets out that a range of events were held with residents since September 2018. The submission identifies the applicant's response and revisions to the scheme in response to comments received during consultation. A Housing Need survey was also carried out between Autumn 2017 and Spring 2021 to understand residents' needs and concerns to inform the design of the redevelopment proposals.
29. A Landlord Offer document was produced which also included the involvement of a Residents Charter. GLA officers have viewed the offer document which includes details on the proposals and ballot, residents' rights, and the approach to the decant strategy and phasing. The applicant sets out a commitment to consult residents throughout and beyond the planning process. In July 2021, the estate-wide resident ballot saw a turnout of 80% of eligible residents vote and 60% vote in favour of the redevelopment of the estate.
30. GLA officers consider that the approach undertaken reflects the key principles set out in the GPGER for early and ongoing consultation.

Alternatives to demolition

31. The applicant has provided details of an options appraisal carried out to assess the viability of various refurbishment and regeneration options for the site. Notable drivers of transformation include overcrowding of existing dwellings, poor standard of accommodation and inadequate layout and accessibility across the site. Although the assessment highlights that some of the issues above could be improved through maintenance, refurbishment and partial infill development, when considering cost, efficacy, and longevity of such measures the applicant has established that redevelopment would be the appropriate option to resolve the significant and chronic issues currently present across the estate. The regenerative benefits of this option were also set out. As discussed above, a ballot has also been carried out with residents voting in favour of the redevelopment.
32. GLA officers are of the view that the decision to redevelop the estate is an acceptable approach, however the applicant must continue to address comments in relation to sustainable development, design and transport to maximise the regenerative and environmental benefits of redevelopment. In terms of the social impact of redevelopment, the applicant's commitment to residents to redevelop in the form of a single decant is strongly supported. Appropriate details should also be secured to minimise disruption and impacts to existing and neighbouring residents.

Like-for-like replacement and rights of return

33. Policy H8 of the London Plan sets out that the loss of existing affordable housing should be resisted unless it is replaced by an equivalent amount of affordable housing floorspace (with no overall net loss). Policy H8 also requires that replacement affordable housing floorspace must be provided at social rent

levels, where it is being provided to facilitate a right of return for existing social rent tenants. The GPGER also seeks to ensure that social tenants have a full right to return to a property on the regenerated estate of a suitable size, taking into account levels of overcrowding or under-occupancy within each household, and at the same or similar rent level, with the same security of tenure.

34. As mentioned previously in this report, the proposal would result in an increase in the quantum of affordable housing floorspace along with an increase in affordable habitable rooms from 527 to 605 habitable rooms. The applicant sets out that the unit mix for the reprovided units is derived from a housing needs survey carried out by Riverside to evaluate existing residents' and future need, including the provision of larger units to address concerns with overcrowding. It is noted that the proposal results in an increase in affordable 3–5-bedroom units and a reduction in 2-bedroom units when compared to the existing unit-mix on the estate. The commitment to re-provide all affordable floorspace should be secured along with the proposed tenure mix and minimum level of affordable housing on the additional units.
35. In line with the principles set out in the GPGER, the applicant's submission and offer document identifies that all 136 existing social tenants with a right to return would be offered a new home within the redeveloped estate, retaining the same tenancy rights and paying the same levels of rent with any residents moving into smaller or larger homes charged the existing rent for that sized home.
36. The applicant's Offer Document states that all residents will be given the statutory Home Loss Payment to compensate for moving and the applicant would provide all residents a disturbance allowance, which includes moving costs.

Phasing and decant approach

37. The applicant has set out an incremental phased demolition and decant strategy for the site which will re-provide all the existing residents with new homes through single decants. The phasing approach utilises the opportunity to redevelop Warner House in the initial phase to unlock the strategy. The development will be carried out in 6 phases over a period of approximately 10 years. GLA officers are strongly supportive of the single decant approach. Appropriate phasing obligations should be included within the S106 agreement.

Housing

Affordable housing and viability

38. As set out in London Plan Policies H5 and H8 and the Mayor's Affordable Housing & Viability SPG, estate redevelopment schemes are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace. Additional affordable housing should meet the Mayor's preferred tenure mix, outlined in London Plan Policy H6 of at least 30% low cost rent (social rent or affordable

rent), at least 30% intermediate (London Living Rent or shared ownership) and the remaining 40% as determined by the local planning authority.

39. As discussed above in paragraph 22, whilst the scheme would not result in an uplift in affordable housing in terms of units when considering the now vacant units within Warner House, there would be an increase in the quantum of affordable housing on a floorspace and habitable rooms basis.
40. The applicant has submitted a Financial Viability Appraisal (FVA) which is currently being scrutinised by GLA officers to ascertain that the scheme is providing the maximum viable amount of affordable housing. Early and late-stage viability review mechanisms should be secured via the S106 agreement, in accordance with the formulas and approach set out in the Mayor’s Affordable Housing and Viability SPG. The affordability details for all tenures must also be robustly secured in line with the requirements of London Plan Policy H6. The GLA’s standard template s106 agreement clauses and definitions for affordable housing and review mechanisms will be provided to the applicant.

Unit mix

41. The applicant has provided the following breakdown of unit mix for the scheme:

	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Affordable rent (social rent / LAR)	55	69	37	16	2	179
Market sale	47	43	6	0	0	96
Total	102	112	43	16	2	275

42. London Plan Policy H10 encourages a choice of housing with a range of unit sizes based on local needs, setting out a number of factors which should be considered when determining the appropriate housing mix with affordable family housing being a strategic priority. GLA officers do not raise any strategic concern with the unit mix proposed. The mix is informed by the housing needs assessment and it is welcomed that the provision of family-sized (3-bedroom+) is skewed towards the affordable rent component. The Council will also assess the proposed unit mix against local need/policy objectives.

Equality considerations

43. London Plan Objective GG1 highlights the diverse nature of London’s population and underscore the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities.

44. Furthermore, the Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.
45. Given that the development involves the redevelopment of an existing housing estate including affordable housing, the applicant should demonstrate that possible equality impacts have been considered and if impacts of the proposals on protected characteristics are identified, the ways in which the applicant has sought to minimise any potential negative impacts.

Urban design

46. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Optimising development capacity

47. London Plan Policy D3 requires the optimisation of sites by following a design-led approach, having regard to site attributes, local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in London Plan Policy D4.
48. In terms of land use and supporting infrastructure capacity, the proposed uplift in homes is considered to respond to the intent of Policy D3(B) in terms of the site's connectivity and accessibility, however the applicant must address comments contained within the transport section of this report in respect of this. The design of the scheme has been refined during the pre-application process including significant reductions in scale to respond to surrounding sensitives. Whilst the proposal is considered to meet the objectives of Policy D3 for a design-led approach to site optimisation, the applicant should also address the comments in the paragraphs below to ensure that the form of the development demonstrates full compliance against the criteria set out in Policy D3(D).

49. Whilst it is not currently considered that the scheme includes tall buildings based on the local definition and does not trigger the requirement for a design review by Policy D4, further discussed below, it is noted that the application has been subject to review from a Design Review Panel, as well as scrutiny from planning and design officers at the Council and the GLA prior to application submission. It would therefore be considered that the proposal is in line with the objectives of Policy D4.

Development form, scale and massing

Tall buildings

50. London Plan Policy D9 seeks to manage the development and design of tall buildings within London. Policy D9 (Part B3) states that tall buildings should only be developed in locations that are identified as suitable in development plans. Part C of Policy D9 also sets out requirements for assessing tall buildings, including addressing their visual, functional, environmental, and cumulative impacts.
51. Policy D9 also sets out that Boroughs should define what is a 'tall building' for specific localities, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
52. The Bromley Local Plan defines tall buildings as those that exceed the general height of their surroundings and cause a significant change to the skyline. Much of the Borough is not considered appropriate for tall buildings due to the established suburban character of the Borough. In this instance, although the proposed development is considered to exceed the general height of surrounding development, GLA officers are not currently of the view that the proposal would result in a significant change to the skyline. As such, the development is not currently considered to comprise tall buildings for the purposes of London Plan Policy D9. However, the Council should clarify this position.
53. Should the Council determine that buildings within the scheme meet the definition of a tall building, although in-principle the site is not in an area identified as suitable for tall buildings, the visual, functional, environmental, and cumulative impacts of the tall buildings would also need to be assessed to determine their overall acceptability.

Assessment of form, scale and massing

54. Notwithstanding the above, the development form, scale and massing of the development has been reviewed within the context of London Plan Policies D3, D4(F) and D6.
55. The proposed scheme would result in a notable increase in built form from the existing buildings on the site. However, in terms of scale and massing, the applicant's Heritage, Townscape and Visual Impact Assessment (HTVIA) demonstrates that consideration has been given to the surrounding sensitivities which include the Beckenham Place Park and heritage assets, along with

surrounding lower-scale residential development and the sloping topography of the site.

56. The development has been formulated to ensure that the majority of the built form would remain below the existing tree line from views within Beckenham Place Park. Whilst portions of the development would still be visible from various viewpoints through the canopy, particularly in winter months (i.e. View 6) which would result in some impact to the character and openness of the park, overall GLA officers are satisfied that the applicant has sought to minimise this impact sufficiently.
57. Furthermore, although the proposal would result in an increased scale and enclosure on Southend Road compared to the existing characterised townscape, GLA officers consider that given the presence of taller buildings within the wider vicinity of the site, the mixture of surrounding building typologies, and retained vegetative screening, the proposed massing would not appear overly intrusive when viewed from Southend Road and would integrate appropriately into the surrounding residential neighbourhood. As such, GLA officers raise no concerns in terms of the scale of the development. The heritage impact of the proposal is also discussed from paragraph 73 of this report.
58. GLA officers raise no further concerns in relation to the form of the buildings. The inclusion of affordable townhouses at the northern end of the site which factors in the change in topography and offers an additional typology on Southend Road is strongly supported. It is noted that the materiality appears appropriate with red brick predominant in the surrounding area. In line with London Plan Policy D4, key details from the design stage should be secured to achieve and maintain the highest design quality. It is also encouraged that the involvement of the original design team is conditioned to monitor the design quality of a development through to completion.

Development layout and public realm

59. Policies D1-D3 and D8 of the London Plan and the Mayor's Housing SPG apply to the design and layout of development and the public realm. Overall, the arrangement and layout of buildings is broadly supported which creates a high level of residential quality with 100% dual aspect homes, centred around open courtyard amenity spaces which generally achieve high levels of solar access, are well overlooked and a well-considered approach to urban greening. The council must ensure that the final landscape proposals are robustly secured to ensure the quality of the spaces. The inclusion of the ecological corridor and protection of the tree canopy to the east of the site is strongly supported, which also seeks to draw the character of the park into the scheme.
60. However, as raised at pre-application stage, a significant concern is the dominance of surface parking within the scheme where the continuous and monotonous line of car parking spaces is not supported. As detailed in the transport section of this report, further mitigation measures are necessary to break down the car dominated environment to make this element of the

scheme acceptable. This should include addressing the inter-relationship between the surface parking and Southend Road and measures to avoid the parking abruptly dissecting the North-South route through the site.

61. Furthermore, the applicant must ensure that a suitable public realm and pedestrian environment is achieved on Southend Road. The retention of the high value mature trees is strongly supported along with the multiple benefits of wildflower planting on the Southend Road buffer. In addition, further consideration should be given to the proposed pedestrian connections from the site to Southend Road to ensure that these will be well used and attractive to activate the Southend Road frontage and pedestrian environment. The Council must ensure that the landscaping proposals are robustly secured.

Residential quality

62. London Plan Policy D6 sets minimum quantitative standards for private internal space, private outdoor space, and floor-to-ceiling heights apply to all tenures and types of housing. Additionally, Policy D6 states that housing development should maximise the provision of dual aspect dwellings.
63. The development would deliver high residential quality with all of the residential units of the scheme dual aspect. The residential quality of the scheme is viewed as a very positive element of the proposal by GLA officers. Although a detailed review will be carried out by the Council, the applicant sets out that all units would comply with minimum unit and amenity standards with minimum floor-to-ceiling heights exceeding 2.5 m. The homes would be well-connected to surrounding green space and GLA officers do not raise concern in terms of overall daylight and sunlight performance for the development. The development would be tenure blind with equitable access to amenity and play space and has efficient core to unit ratios.
64. In accordance with London Plan Policy D6(D), the development must ensure that sufficient daylight and sunlight is provided to surrounding housing that is appropriate for its context, whilst minimising overshadowing and maximising the usability of outside amenity space. Separation distances to neighbouring properties should also be carefully considered to ensure adequate privacy and outlook. The Council's assessment in this respect will be reviewed at the Mayor's decision-making stage.

Fire safety

65. The applicant has submitted fire information in the form of an outline fire strategy. Although the detailed fire strategy demonstrates that the fire safety of the development has been considered from the outset, including the provision of evacuation lifts as required by London Plan Policy D5, it is not clear that each of the requirements of London Plan Policy D12B (parts 1-6) and D5 have been addressed. An additional statement should be provided as an appendix to the document clearly specifying how the policy criteria is met with consideration given to the draft Fire Safety London Plan Guidance ([here](#)) to ensure that the appropriate level of information is provided under each category. In particular,

the fire consultant should review sections 5.2 and 6 of the draft guidance. A declaration of compliance should also be provided in Fire Statement (see Section 7 of the draft Guidance) confirming compliance with the requirements of D12(B) and D5.

66. The Council should then secure compliance with the revised statement by condition and is encouraged to refer to the example conditions listed in the draft Fire Safety LPG.

Inclusive access

67. London Plan Policy D5 seeks to ensure that new development achieves the highest standards of accessible and inclusive design. In addition, London Plan Policy D7 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
68. The applicant has identified that the scheme will provide 29 wheelchair units which exceeds 10% of the residential unit numbers and also meet the South East London Housing Partnership (SELHP) standards required by the Borough. The wheelchair units would be distributed throughout the market and affordable residential units of the scheme, with a mix of unit sizes also provided. Furthermore, the applicant confirms that all remaining units would achieve M4(2) standards. The Council should appropriately secure the M4(3) and M4(2) units.
69. Details of the approach to accessible and inclusive design are included in the applicant's submission. The development would be step-free and consideration has been given to entrances and circulation, which would result in a significant improvement from the conditions on the existing estate. Evacuation lifts will be included within the development as required by Policy D5, however further information is required in relation to fire safety as detailed in the above section. In addition, further information is required in terms of consideration of impact on equalities and the applicant should address comments relating to the Blue Badge car parking spaces within the transport section of this report.

Play space

70. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child. The requirement should be based on the GLA Population Yield Calculator. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement. Play space provision should be available to all housing tenures to promote social inclusion.

71. Applying the GLA population calculator, the required playspace is 2,204 sq.m. based on the proposed unit mix. The applicant would provide the required play space on site for each age group. The communal courtyards have been well utilised to incorporate play space for the 0-4 years and 5-11 age groups. Play for the 12+ age group would be provided along the vegetated corridor to the east and north of the site. The proposed strategy to accommodate all play space provision on-site is supported. The Council should ensure that the peripheral play space receives adequate visibility from the development and won't interfere with other objectives (i.e. areas for planting within this corridor).
72. The ongoing availability of all play space to all children in the development must be secured by appropriate conditions. The quality and design of equipment provided in play areas should also be secured.

Heritage

73. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.
74. The site is not within a Conservation Area and there are no heritage assets located on the site, however the Beckenham Place Conservation Area directly adjoins the site to the east. The Grade II* listed Beckenham Place Mansion is situated approximately 150 metres from the eastern boundary of the site, within Beckenham Place Park. The Grade II listed Stable Block, Outbuildings and Garden Walls to Beckenham Place also lie a similar distance from the site boundary.
75. The applicant has submitted a Heritage, Townscape and Visual Impact Assessment (HTVIA) which reviews the surrounding heritage assets and the likely impacts of the development. In this instance, GLA officers consider that there would be a low degree of harm resulting to the significance of the Beckenham Place Conservation Area and to the significance of the Grade II* listed Beckenham Place Mansion and the Grade II listed Stable Block, Outbuildings and Garden Walls. The development would remain peripheral and the applicant has sought to avoid harm by ensuring the development is below the tree line. However, officers have also noted the existing uninterrupted parkland views, including those which form part of the historic setting of the Grade II* and Grade II listed buildings and structures, along with the sensitivity of the park and the perimeter tree belt making up a key element of the designated landscape. Officers consider that a low level of harm would arise from the visibility of the development through the tree canopy in winter months.

76. The Beckenham Place Park Conservation Area (LB Bromley) and Southend Road, Beckenham Conservation Area are located further to the south and south-west of the site and would not be harmed by the proposed scheme. Similarly, no harm would result to the Grade II listed assets the Summer Pavilion, Beckenham Tennis Club and Two Lodges to Beckenham Place.
77. The Council should consider the impact on non-designated assets to allow officers to provide an update to the Mayor at Stage II.
78. In accordance with paragraph 202 of the NPPF, where a development will lead to 'less than substantial harm' to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, great weight and importance should be attached to harm to designated assets.
79. GLA officers consider that the proposal would result in some less than substantial harm to the significance of heritage assets within the surrounding vicinity of the subject site. Although harm to heritage assets would be contrary to London Plan Policy HC1, the NPPF heritage balance would also be triggered, and in accordance with the NPPF this harm would need to be able to be weighed against the public benefits of the proposal. The results of the assessment by the Council's heritage officers and Historic England on the proposals' impact on heritage assets will be reported to and taken into account by the Mayor at Stage II.

Transport

Healthy streets – walking & cycling

80. All developments should deliver improvements that support the ten Healthy Street indicators, in line with London Plan policy T2. As there are primary residential accesses along the proposed internal access routes, these should also provide a Healthy Streets environment. Appropriate footway widths, landscaping, and natural surveillance should be provided. In addition, further comments in relation to the public realm and pedestrian environment have been provided in paragraphs 60 and 61 of this report.
81. The proposed development will be required to make contributions towards off-site walking and cycling improvements via a S106 legal agreement. This may include new or improved crossings on Southend Road, signage/wayfinding to local rail stations (e.g. Beckenham Hill or Lower Sydenham), or improvements to local pedestrian and cycling routes.

Vehicular access

82. The proposal replaces one single vehicular access point from Southend Road (Calverley Close) with three separate entrances onto three private roads, all containing surface car parking. This represents a degradation of the quality of the streetscape and worsens the walking and cycling experience along

Southend Road by increasing the potential for vehicle and pedestrian/cyclist conflicts, contrary to Healthy Streets principles and Vision Zero objectives. It also has the potential to negatively affect bus operations along Southend Road. The number of accesses combined with the proposed private highways and surface car parking will perpetuate the car dominated environment of the existing estate. Significant mitigation measures and robust justification would be required to make this acceptable from a Healthy Streets perspective. This should include, amongst other things, traffic calming measures with physical infrastructure (e.g. raised pedestrian crossings) at the accesses, wide footways, and appropriate landscaping and street furniture to provide a buffer from traffic.

83. Ideally, the proposed parking/vehicular access areas should be consolidated to reduce the number of two-way accesses and to align better with London Plan policy. Ideally, the overall level of car parking should also be reduced. Permeability for pedestrians and cyclists should, however, be retained and improved.

Car parking

84. In line with the Mayor's objectives of reducing car-dependency and ensuring that at least 75% of trips in Outer London are made by public transport or active modes by 2041, car parking should be limited. Table 10.3 of the London Plan provides that Outer London sites with a PTAL rating of 2-3, should provide a maximum car parking ratio of 0.75 spaces per unit for 1-2-bedroom units and one space for 3-bedroom units and larger. In this case, this results in a maximum of 221 car parking spaces.
85. The proposed development provides a total of 125 car parking spaces and thus below the maximum standards as set out in London Plan Policy T6.1. However, Policy T6 requires developments in less well-connected areas to provide only the minimum necessary parking. It is noted that 78 of these spaces are replacing spaces for returning residents who own cars, as determined by the housing needs survey detailed in the Transport Assessment (TA). This is acceptable as long as the residents live in the new development and own a car; however, in line with the London Plan's aspirations, a lower car parking ratio is encouraged to reduce car domination, improve cyclist and pedestrian safety and comfort, and support more sustainable lifestyles.
86. This total also includes nine disabled persons' spaces for Blue Badge holders. Whilst this is slightly in excess of the 3% of total units provision required under Policy T6.1 of the London Plan at the outset, in this case it is considered acceptable provided there are strong controls to ensure the spaces are used only by Blue Badge holders and allocated on the basis of need and not tied to particular homes. It should be made clear how a provision of disabled persons' parking for up to 10% of the total number of units can be accommodated, if demand justifies. It is proposed that Blue Badge spaces are evenly distributed throughout the site. However, this results in some spaces that are far from the residential lobbies and lifts, which it is anticipated most Blue Badge holders will be using. Therefore, the location of these spaces should be further refined to ensure that proximity to where there is likely to be highest demand, or that

there is flexibility in the design and allocation to respond to specific need for such a space.

87. 20% of car parking spaces will be provided with electric vehicle charging points (EVCP) from the outset, with the remainder having passive provision. This should be secured by condition including a plan which would manage the transition of passive ports to active at no cost to residents. It is encouraged that all of the Blue Badge spaces be provided with active ECVP provision from the outset.
88. One car club space is also proposed. The car club space should be appropriately secured alongside arrangements for residents' use of the vehicle.
89. A comprehensive Parking Design and Management Plan should also be secured by way of condition.
90. Residents should be excluded from eligibility from CPZ parking permits and the Council should consider whether the existing CPZs near the site should be enlarged and/or have additional hours of control. If so, an appropriate contribution should be secured.

Cycle parking

91. The proposal incorporates a total of 500 long-stay cycle parking spaces within a number of separate cycle store rooms in each residential core and eight short-stay spaces within the public realm. The minimum London Plan quantum of cycle parking is met. However, further work and clarification is required to demonstrate full compliance with LCDS as also required by Policy T5.
92. Officers query the cycle parking for townhouse units, as the preference is to provide these residents with access to the communal stores rather than on-plot spaces. It must also be demonstrated that exterior accesses to the cycle stores do not present safety concerns. Further details are also required in relation to short-stay spaces. The short-stay spaces must be located in visible and accessible parts of the public realm, close to residential entrances, and should be in at least two separate locations given the size of the site and number of residential cores. Detailed transport comments covering these matters will follow to the Council and applicant.

Transport network impacts

93. Taking into consideration the anticipated trip generation, it is considered that these trips would not result in a significant impact on the SRN but further work is required to demonstrate that additional bus passengers, on route 54, the only bus service which runs adjacent to the site, would not result in peak time crowding.
94. One proposed access would appear to be within the bus stop cage on Southend Road. This part of the scheme should be revised to avoid impacting bus services and passengers.

95. The submitted Travel Plan identifies a number of key services and facilities which can be reached by active travel or public transport. Many are in Beckenham Town Centre. In line with London Plan Policy T2, Section 106 contributions towards healthy streets should be focused on improving walkability long Southend Road, including new and/or improved crossing facilities, subject to discussion with Bromley Council as highway as well as planning authority. Improvements should also be secured towards links with the nearest rail stations and subject to discussion with TfL the nearest bus stops which would be used by residents and their visitors.
96. A comprehensive Travel Plan should be appropriately secured.

Deliveries and servicing

97. An Outline Deliveries & Servicing Management Plan has been submitted in support of the application. Deliveries and servicing are generally proposed to be handled through the three proposed access roads. The current servicing arrangements involve refuse trucks and other large vehicles to reverse over pedestrian footways, contrary to Vision Zero and this should be addressed along with the aforementioned concerns about the proposed vehicle access arrangements.
98. A full Deliveries & Servicing Plan should be secured by way of a planning condition.

Construction

99. A full Construction Logistics Plan (CLP) should be submitted and approved prior to any construction works taking place, including demolition and site clearance. It should demonstrate how the operation of the adjacent bus stop and bus services more generally are not impacted and likewise a pleasant and safe environment for pedestrians and cyclists is maintained. If there is any impact on bus operations this must be discussed with TfL prior to any approval. Delivery and waste hours should avoid peak times as well as drop-off/pick-up hours of local schools.

Sustainable development

Energy strategy

100. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations which should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.
101. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further

information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

- Be Clean – demonstration that the heat loads served by on-site communal networks has been maximised;
- Be Green – demonstration that renewable energy has been maximised, including detailed roof layouts showing the extent of PV provision to all roofs and further details of the proposed air source heat pumps;
- Be Seen – compliance to be secured within the S106 agreement;
- Energy infrastructure – further details on the design for future district heating network connection is required, and this future-proofing must be secured by condition or obligation;
- Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

102. In addition, the applicant should confirm the carbon offset payment that will be made to the borough. For the domestic new-build element, the development is estimated to achieve a 74% reduction in CO2 emissions compared to 2013 Building Regulations.

103. The development falls short of the net zero-carbon target in Policy SI2, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

Whole life-cycle carbon

104. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

105. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2. Further information is required on third-party verification mechanisms, details on the options assessment for retaining the existing buildings and in relation to the key actions to reduce whole life-cycle carbon emissions. The applicant needs to respond to the WLC Memo provided and update the GLA WLC Template accordingly. Detailed comments have been provided to the applicant and Council.

106. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions.

The template and suggested condition wording are available on the GLA [website](#)¹.

Circular economy

107. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
108. The applicant has submitted a Circular Economy Statement. The Circular Economy Statement does not yet comply with London Plan Policy SI7 and a revised Circular Economy Statement must be provided in line with the adopted London Plan Guidance (March 2022). Further information is required in relation to the design approach and principles, pre-redevelopment and pre-demolition audits, bill of materials, recycling and waste reporting, operational waste, Circular Economy targets, post-construction report, end-of-life strategy and in relation to supporting documentation. Detailed comments on these aspects have been provided to the applicant and Council.
109. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)².

Digital connectivity

110. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

Environmental issues

Green infrastructure and urban greening

111. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening. This includes the green links across the site to integrate into London's wider green infrastructure network. This also includes the incorporation of rain gardens which supports multifunctionality, in accordance with Policy G1 of the London Plan. The opportunity for the provision of biosolar roofing should be explored.

¹ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

112. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.4, which meets the minimum target set by Policy G5 of the London Plan.

Trees

113. There are a number of existing trees on site. It is clear that the retention of trees of value has been carefully considered within the Design and Access Statement (DAS). The applicant has provided an Arboricultural Impact Assessment (AIA), which states that 59 individual trees are to be removed to facilitate the proposed development, including Category B trees and a single Category A tree. 40 standard trees and 57 multi-stemmed trees are proposed.

114. The applicant should provide an assessment of the value of the trees to be lost using the appropriate valuation system and set out how this has been accounted for through replacement tree planting within a reasonable timescale, such as 15-20 years to allow proposed trees to establish and mature. Tree value can be derived from 'i-tree' or 'CAVAT', or another appropriate valuation system, in accordance with Policy G7 of the London Plan. Without this valuation comparison, compliance with Policy G7 cannot be determined.

Open space

115. The applicant demonstrates consideration of access to public open space across the site, in accordance with London Plan Policy G4.

Biodiversity

116. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The DAS sets out that there will be a biodiversity net gain of 12.5%.

Local planning authority's position

117. Bromley Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

118. 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 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

119. There are no financial considerations at this stage.

Conclusion

120. London Plan policies on land use principles, housing, equality, urban design, heritage, transport, sustainable development, and the environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land Use Principles:** The proposal would comply with the Mayor's key principles for estate regeneration set out in the London Plan and GPGER. The uplift in housing is supported and GLA officers could accept the re-provision of the former sheltered accommodation units as regular affordable housing, subject to consideration of the Council's assessment of the rehousing arrangements at Stage II.
- **Housing:** The application would provide an uplift in affordable housing when measured by floorspace and habitable rooms. Considering the estate regeneration nature of the scheme, the proposal will need to follow the Viability Tested Route and GLA officers are currently scrutinising the information submitted. Early and late stage reviews are required. GLA officers do not raise any strategic concern with the unit mix proposed.
- **Equality:** Given that the development involves the redevelopment of an existing housing estate including affordable housing, the applicant should demonstrate that possible equality impacts have been considered and if impacts of the proposals on protected characteristics are identified, the ways in which the applicant has sought to minimise any potential negative impacts.
- **Urban design:** GLA officers are broadly supportive of the design in terms of the built form and residential quality. The applicant should address comments in relation to site layout and public realm, notably in relation to the expanse of surface parking, along with comments in relation to fire safety and inclusive design. GLA officers do not consider that the proposal would include tall buildings, however will also review the Council's determination of the scheme in relation to this aspect at Stage II.

- Heritage: GLA officers consider at this stage that the proposal would result in a low level of less than substantial harm to nearby heritage assets which would need to be weighed against the benefits of the proposal at Stage II.
- Transport: The applicant should address comments in relation to healthy streets, vehicle access, car and cycle parking, transport network impacts and deliveries and servicing. Contributions should be discussed and secured towards healthy streets and rail and bus infrastructure improvements. Details outlined within the transport section of this report should be secured.
- Sustainable development and environmental issues: The applicant must address outstanding comments in relation to the energy strategy, whole-life cycle carbon, circular economy and trees.

For further information, contact GLA Planning Unit (Development Management Team):

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