Crossness Sewage Treatment works
in the London Borough of Bexley
planning application no. 08/03936/FULEA

Strategic planning application stage 1 referral (old powers)

The proposal
Extension to the existing sewage treatment works to include additional industrial buildings (2,534 sq.m), plant and tanks increasing the total floor space by 47,162 sq.m. The applicant has also proposed the installation of a 2.5 megawatt wind turbine, 86 metres in height to hub, with 90 metre diameter blades. Mitigation works are proposed at the site, including creation of a reed bed and wetland area.

The applicant
The applicant is Thames Water Utilities Ltd, and the architect is Charles Planning Associates Ltd

Strategic issues
The principle of development on Metropolitan Open Land and a Site of Metropolitan Importance for Nature Conservation has been justified by the circumstances of the proposal. The contribution to renewable energy provision of the wind turbine is welcomed, although further energy information is required. The environmental impacts of the scheme have been satisfactorily mitigated. Contribution towards enhanced the linkages between the open spaces to support the East London Green Grid Framework should be made.

Recommendation
That Bexley Council be advised that the proposal is acceptable in principle, subject to satisfactory resolution of the issues raised in the report.

Context
1 On 11 April 2008 Bexley Council consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor’s use in deciding what comments to make. The application was validated by Bexley Council on 20 March 2008.

2 The application is referable under Categories 1C and 3D of the Schedule of the Order 2000:
• “Development which comprises or includes the erection of a building more than 25 metres high and is adjacent to the River Thames;
• “Development which would involve the construction of a building with a floorspace of more than 1,000 square metres on land allocated as Metropolitan Open Land in the development plan”.

3 If Bexley Council subsequently decides that it is minded to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor of London’s comments on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The application site comprises three parts, the existing Crossness sewage treatment works (STW), where the proposed STW related development is to be constructed (refer to appendix 1, figure 2), and two smaller remote parcels of land for which ecological mitigation measures are proposed.

7 The existing operational STW is identified as such the Bexley Unitary Development Plan (UDP). The STW site total area is 78.6 hectares and includes all the existing STW related plant, tanks, equipment and buildings, an ornamental pond, disused sludge and grit lagoons, a sludge powered generator and surrounding open land (designated as Metropolitan Open Land). The generator has a distinctive curved roof, a 60 metre stack and stainless steel cladding. It is located on the eastern side of the STW and adjoins both the Crossness Nature Reserve and the Thames Riverside Path. The tanks occupy a significant amount of the operation area and are concrete, with heights of between 4-6 metres above ground level.

8 The site is bounded by the River Thames to the north, the A2016 to the south, a golf course to the west and the Crossness Nature Reserve to the east. The Crossness Southern Marshes is a tract of undeveloped land which abuts to the south of the A2016. This land has not been used for a number of years and consequently a self-colonised habitat has developed in this area over time. The southern boundary landscape varies in height from 6m immediately north of the A2016 to 3.9m above the park on the northern side. This landscape bund contains semi-mature tress and vegetation that screen views of the STW from the A2016. It is proposed that this will be extended to screen the extension being proposed.

9 The A2016 Eastern Way, forms part of the Strategic Road Network. The nearest part of the Transport for London Road Network is the A205 John Wilson Street in Woolwich, approximately 5km to the west. The nearest railway station is Abbey Wood, located approximately 2km away from the site. Although four bus routes serve the area, none of the respective bus stops are within acceptable walking distance from the site. As a result, it is estimated that the site records a public transport accessibility level (PTAL) of 1, on of a scale of 1 to 6 where 1 is considered as very poor. However, this should be confirmed by the applicant by providing the necessary calculations as part of the transport assessment.

10 The defined operational site boundary was agreed as part of the UDP process and has been the subject of some scrutiny. The majority of the proposed development falls on land designated as Metropolitan Open Land (MOL) and Area of Metropolitan Importance for Nature Conservation.
11 Typical building heights are of three storeys at this site, however some are higher than this. To the west and south-west of the STW site is the developed area of Thamesmead, which comprises a range of residential, community and commercial uses. Beyond Thamesmead to the south is Shooters Hill, which forms a backdrop to views from the north of the site.

12 Crossness STW was constructed by Sir Joseph Bazalgette in the 1860s when it only served the purpose of receiving and storing sewage from London via the Southern Outfall Sewer and only included tidal storage tanks. The existing layout was constructed during the 1950s and 1960s and comprises tanks, plant, machinery and buildings, the latter being located near the entrance in the south west corner. The majority of the existing STW is not in MOL and is identified as a Special Industrial Zone in the Bexley Council UDP (April 2004) but the UDP defines a wider STW operational area which includes MOL beyond the industrial designation. Part of this area is also designated as a Site of Importance for Nature Conservation (SINC) and a small part of the site is a Conservation Area and the Victorian pumping station is listed. An extract of the UDP proposals map is shown below.

**Key for the Proposals Map extract below:**

- **The red boundary** – Conservation Area
- **The yellow boundary** with letter B – Thames-side Special Policy Areas – Crossness Sewage Treatment Works
- **The purple and white striped area** – Special Industrial Zone
- **The green striped area** – Area of Metropolitan Importance for Nature Conservation
- **The light green area** – MOL

(Bexley Council UDP Proposals Map 28 April 2004)
Crossness STW receives flows from a westerly and southwesterly direction from the site, and serves a number of London Boroughs wholly or in part. These include Bexley, Bromley, Croydon, Greenwich, Lambeth, Lewisham, Merton, Southwark, Sutton and Wandsworth. It therefore serves an estimated population equivalent of approximately 1,950,000.

Details of the proposal

The proposed development is part of a series of works to improve the water quality of Thames Tideway. The extension to the STW is proposed as a direct response to the requirements of the Urban Waste Water Treatment Directive (UWWTD), which requires Thames Water Utilities Ltd (TWUL) to increase the volume of storm sewage influent, which passes through full treatment at Crossness STW.

The extension will improve the water quality of the River Thames through providing additional capacity to treat dry weather sewage flows to a higher standard and provide additional capacity to fully treat an increased quantity of storm flows (flows during and after heavy rainfall). The proposed footprint (i.e. permanent landtake, including internal access roads and buildings/structures) of 8.2 hectares will include:

- An Inlet Pumping Station;
- Preliminary Treatment, in the form of screenings and grit removal, as well as a building containing conditioning and washing plant;
- Primary Sedimentation, in the form of tanks which use gravity settlement to separate and remove sewage sludge and flotation for the removal of fat, oil and grease;
- Secondary Treatment, using aeration tanks and final settlement tanks. This process stage includes a ‘blower’ house building and a recirculation pumping station;
- Sludge thickening and handling plant contained in a building;
- Odour management plant;
- A number of smaller substation enclosures and ancillary structures;
- Roads and hardstandings; and
- Associated temporary construction compounds within the STW site.

In addition to this the applicant is proposing to install an 86 metre high wind turbine (to hub), which will be located in the south-east of the existing operational STW site. (Refer to appendix 1, figure 2).

A reed bed and wetland area will be created so the south of the operational areas.

Figure 1 (attachment) is an aerial photo of the existing site. Figure 2 shows the intensity of further development proposed at this site. The proposed extension will provide additional waste treatment stream by allowing 44% of existing flows to be fully treated with all the combined flow being to a higher environmental standard. The objective of the extension is both environmental and to accommodate for some population growth within the existing catchment boundaries.

The proposed STW improvements are required to be operational by March 2014, with construction anticipated to start in 2009 running for approximately 4.5 years. The maximum anticipated construction workforce on-site during one month would be approximately 230.

Case history

Officers from the GLA were originally consulted with for pre-application advice relating to the sewage treatment plant proposals in October 2007. The issues raised at the time in relation to
both energy and biodiversity have been considered in this submission and reflect the guidance provided in the development progression of this application.

Strategic planning issues and relevant policies and guidance

21 The relevant issues and corresponding policies are as follows:

- Water & Sewage Infrastructure: London Plan
- Loss of MOL: London Plan; East London Green Grid Framework; PPG2
- Energy: London Plan, Mayor’s Energy Strategy
- Biodiversity: London Plan; the Mayor’s Biodiversity Strategy; PPG9
- Design: London Plan: PPG1
- Flooding: London Plan; PPG25
- Transport: London Plan; the Mayor’s Transport Strategy; PPG13
- Air quality: London Plan; the Mayor’s Air Quality Strategy; The Control of dust and emissions from construction and demolition BPG; PPS23

22 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 Bexley Unitary Development Plan, which was adopted in April 2004 and the 2008 London Plan (Consolidated with Alterations since 2004).

Water and sewerage infrastructure

23 Policy 4A.18 of the London promotes partnership working with relevant stakeholders to ensure that London’s drainage and sewerage infrastructure is sustainable and meets the requirements placed upon it by population growth and climate change. The policy also identifies the need to provide additional capacity the management of sewage sludge and states that the Mayor will work in partnership with the boroughs to ensure timely provision of appropriate facilities at sewage treatments works in London.

24 The development is part of a series of works to improve the water quality of Thames Tideway and is a direct response to the requirements of the Urban Waste Water Treatment Directive, which requires Thames Water to increase the volume of storm sewage influent, which passes through full treatment at Crossness STW.

25 The extension will improve the water quality of the River Thames through providing additional capacity to treat dry weather sewage flows to a higher standard and provide additional capacity to fully treat an increased quantity of storm flows (flows during and after heavy rainfall).

26 The proposal is therefore supported by policy 4A.18.

Loss of Metropolitan Open Land

27 Part of the application site (and the majority of the new development) is located on land that is identified within Bexley’s Unitary Development Plan as being within Metropolitan Open Land (MOL). Policies 3D.9 and 3D.10 of the London Plan align the presumption against inappropriate development for Green Belts, set out in national guidance, PPG2, to MOL and gives both the same level of protection. Built development of the nature proposed constitutes inappropriate development in terms of both government guidance and the London Plan. Accordingly, such development should not be permitted except in very special circumstances.
The proposed development’s primary purpose it to improve the water quality and aquatic conditions within the Thames Tideway for fish and other aquatic species. At present, heavy rainfall and the consequent runoff which results during such periods causes the STW catchment to reach its threshold. The excess flow of combined rainwater and sewage is then discharged directly to the Thames Tideway via a series of Combined Sewer Overflows and from the STWs when its treatment capacity is reached. This has a significant impact on the biodiversity of the Thames as well as other amenity and health issues.

To address this problem, Thames Water together with the Environment Agency, the GLA, Department for Environment, Food and Rural Affairs and the Water Services Regulation Authority began the Thames Tideway Strategic Study to address the problems caused by these storm discharges from the Combined Sewer Overflows along the river.

The main European statutory driver requiring this action is the Urban Waste Water Treatment Directive, which requires secondary treatment of urban waste water to prevent the environment from being adversely affected by the disposal of insufficiently-treated urban waste water. The proposed capacity and quality improvements to the existing STWs is one of the steps to addressing these problems.

The EU statutory requirement, the benefits to biodiversity and health and the support for the scheme in the London Plan together constitute the very special circumstances required to justify the development. Furthermore paragraph 5.19 of the Bexley UDP, which supports Policy ENV15 of the UDP states that ‘development of TWUL land at Crossness will normally be permitted where this is a necessary part of its functions as a statutory undertaking and which would result in environmental improvement.’

In addition the visual impact of the proposed development is considered to be minimal due to the low lying design proposed for the new buildings, (which can be viewed in figure 2 appendix 1, refer to the attachment) set behind a bund which will also be extended to avoid visual intrusion from the south. The environmental improvements to the water quality and habitat preservation, together with the mitigation measures proposed which will compensate and enhance the open space and species diversity will significantly offset the loss of MOL.

The wind turbine will introduce a new tall structure into the area. However, this should be viewed in the context of the existing industrial nature of the site and the two 86 metre high turbines located on the opposite side of the river. These are not visually dominant against the existing structures in the area and the proposed turbine would complement these turbines already in place.

**Sustainability**

Consideration has been given to the material selection, water conservation, waste minimisation, and conservation of the natural environment and community issues such as noise, odour and job creation. A Flood Risk Assessment (FRA) has been undertaken by the applicant with guidance received from Environment Agency officers.

The GLA advise that consideration be given to the East London Green Grid Framework SPG, in particular the opportunities outlined for the Bexley, River Cray and Southern Marshes section of the SPG (section 5 page 48-49) to ensure that high quality open space links are created and maintained between the existing and proposed habitats and to explore opportunities to increase the flood storage capacity of this local floodplain. Mitigation and adaptation is considered vital due to the predicted effects of climate change. Sustainable drainage and storage measures should be incorporated in the mitigation measures proposed to reduce surface runoff and ensure the linkages between Erith Marshes and the river are maximised.
Energy

Energy Efficiency - Policy 4A.3

36 No building modelling work has been undertaken because of the small building-related energy usage, which is acceptable in this case. The estimated carbon emissions are of around 2,210 tC/year. Energy efficiency measures are proposed that reduce carbon emission by 11%.

Combined Heat and Power (CHP) - Policy 4A.6

37 Non-applicable. The applicant should however provide further information about the existing sludge power generation plant. Clarification is sought as to whether the sludge is used to raise steam and obtain electricity in a steam generator. The applicant should also state the electrical efficiency of the plant and comment on the suitability of recovering waste heat originated in the power generator to feed a district-heating network serving adjacent customers.

Renewable Energy- Policy 4A.7

38 The applicant has conducted a total energy demand assessment for the extension and stated their commitment to providing 20% of this energy from renewable sources. This is following a series of informal pre-application discussions with the applicant and GLA energy officers. It has been estimated that the extension will increase carbon dioxide emissions from the entire STW by approximately 25%, in the absence of a renewable energy proposal.

39 Thames Water (TWUL) has proposed a 2.5 Megawatt (MW) wind turbine at this site. It is estimated by TWUL that this will supply approximately 20% of the proposed extension’s energy demand. Although the precise specification of the wind turbine is yet unknown, it is anticipated that a variable speed turbine up to 86m height (to the hub) and a rotor diameter of 90m will be sited here.

40 The site across the river from the Crossness STW is an industrial area made up of large factory and storage units. This site already has two 85 metre hub height 2MW wind turbines. These are not visually dominant against the existing high structures at this site and it is considered that the turbine proposed at the STW would compliment these turbines already in place.

41 However, more information should be provided in order to better understand the stated electricity generating capacity of the wind turbine. It is advised that the applicant provide the following information:

- Estimation of wind resource at the site accounting for the nature of the surrounding terrains
- Estimation of the annual electricity produced by the proposed wind turbine model relating its power curve to the annual wind resource of the site.

42 The applicant should also provide/obtain any information about the performance of the two existing adjacent wind turbines to more clearly understand the performance of the wind turbine for this particular scheme.

43 A wind turbine of at least 2 MW and a hub height of at least 80 metres should be installed by the time the improvements works at the Crossness Sewage Treatment Plant have been finished. This should be required by a condition/S106. It is recommended the applicant submit an alternative renewable energy proposal for consideration in case the wind turbine is not deliverable at detailed feasibility stage.
The applicant has also looked at the possibility of obtaining biogas out of the anaerobic digestion of the sludge. This option is currently not compatible with the existing Sludge power generator, which burns dry sludge to obtain electricity. The existing plant will handle the additional sludge as a result of the improvement of the plant.

**Energy Conclusion**

Overall, sufficient information has been provided to understand the energy proposals, although further details are required in particular areas raised above. Finally, the proposals are acceptable in broad terms subject to the provision of further information.

**Noise**

A noise assessment from the proposed wind turbine has been undertaken by the applicant and it has been stated that the noise levels at the nearest sensitive receptors are predicted to remain well within the limits outlined in the BS4142 guidance. Furthermore, due to the remoteness of the STW, the nearest residential properties are also not likely to experience vibration resulting from piling activities, which are considered to be the worst-case construction activity at this site. Hence the extension will not contribute to building damage or annoyance to existing residents.

**Odour/Air Quality**

This extension is expected to increase odour levels by 12% if there were no mitigation measures proposed, however a range of mitigation measures proposed to reduce the effect have been incorporated in the design of the proposal. It is proposed that the mitigation combined with a 4% reduction arising from separate storm tanks cleaning project will contribute to an overall reduction in odour levels from the whole site by approximately 7.5%. In addition to the odour mitigation measures proposed, a separate project to install automatic cleaning equipment in the existing storm tanks is also proposed, which will further reduce odour by a further 4%.

**Design**

The proposed development will help to meet a number of pressing issues such as water quality, species diversity and increasing capacity requirements to address the increase in population but good design (architecture and landscape design) are important in the delivery of this development.

The structures proposed are operational equipment and therefore have a functional design characterised by a steel frame structure and metal sheet cladding. The additional three buildings will be of 10.8 metres, 8.7 metres, and 8.0 metres in height respectively.

It is important to carefully consider the boundary treatment and landscape design of the whole site. More details should be provided on the edge treatment and how this site links in to its wider context.

The extension of the STW should make sure the listed Victorian Pumping Station benefits from this new development; the restoration of the Victorian station should be seen as a key priority as is improving the links between the pumping station and its wider context (including links to the river Thames, links to the Crossness Nature reserve and improve public transport links).

The applicant is recommended to engage with Design for London to ensure the (landscape) design of the scheme is improved and to ensure it meets the policy requirements for high quality design.
**Biodiversity**

53 The GLA Biodiversity officers were consulted during earlier consultations undertaken by the applicant and it is evident that the suggestions made for mitigation at the Crossness STW site have been incorporated in the application.

54 The proposed development impacts on part of a Site of Metropolitan Importance for Nature Conservation, Erith Marshes, as identified through the adopted procedures for London.

55 London Plan Policy 3D.14 is clear on the expectation of boroughs to strongly protect Metropolitan SINCs. As the development will result in the permanent loss of a significant area of the SMI (c. 7 ha), there is an issue of potential departure from regional policy. However, the purpose of the development is to improve the water quality of discharges from the treatment works into the River Thames, offering a clear enhancement opportunity to another Site of Metropolitan Importance (The River Thames and tidal tributaries). Taken in this context, the loss is acceptable.

56 Mitigation Strategy proposals for the losses from the SMI:

It should be noted that the lost area in the SMI is somewhat marginal in comparison with the habitats for which the site is primarily designated, and importantly does not intrude into the adjacent Crossness Nature Reserve. A full ecological impact assessment has been undertaken for the proposals, which includes a detailed analysis of impacts to the Erith Marshes SMI and a habitat creation strategy to offset and ameliorate these. This is a comprehensive document, which is supported by the GLA.

57 In mitigation for the loss of habitat the applicant proposes significant habitat creation, effective both within the expanded STW footprint and the neighbouring Crossness Nature Reserve. In summary this amounts to a convincing and feasible mitigation/compensation package, comprising a number of projects that will contribute moreover to the restoration and re-creation targets for London Biodiversity Action Plan priority habitats in the revised London Plan (2008). These priority habitats include floodplain grazing marsh, reed beds and wasteland. This mitigation strategy should be made fully enforceable as a condition or series of conditions as suggested in the Environmental Statement.

**Flood Risk**

58 The site is within Flood Zone 3a and a flood risk assessment has been carried out.

59 As a “less vulnerable” land use the principle of the development is acceptable. The assessment has also examined potential breaches of the tidal flood defences and concludes that there are no significant changes to risks under breach conditions as a consequence of the development.

**Transport for London comments**

60 Information related to existing and future car and cycle parking provision, as well as sustainable modes of travel to the site, is currently missing from the report and should be provided. It is expected that cycle facilities on site be compliant with TfL’s cycle guidance for this particular type of use. Although no references have been made to changes in staff number as part of the report, TfL requests that future traffic impact, once the development is complete be submitted.

61 Given that the largest impact of the proposals will be during construction period, TfL would request that construction traffic be co-ordinated to avoid accessing the site during peak traffic
periods. This could be secured through conditions and would help to mitigate any potential adverse effects of the proposals during this phase.

Considering the proximity of the site to the river, TfL would also encourage the applicant to investigate the scope for using nearby jetties, deemed appropriate for construction transportation and freight uses, to transport aggregates. TfL would therefore suggest the applicant to consult the relevant Port of London Authority’s guidance on this matter. Alternatively, trip reduction as a result of on-site retention of excavated material, as recommended in DfT’s Water Freight Planning Guidance, and increase in average vehicle size to encourage a more efficient use of road space, eventually through DfT’s Freight Facilities Grant, are strongly recommended by TfL to be investigated. If considered feasible, viable and appropriate, those should be dealt through section106 conditions.

No allowance has been made as part of the TA for staff travelling to and from the site by public transport. TfL would therefore require the applicant to investigate the scope for improving public transport in the vicinity of the site and encourage more sustainable modes of travel. Improvements to pedestrian and cycle linkages to nearby public transport amenities mainly bus stops, bus stops upgrade, as well as provision of a potential bus route extension or shuttle bus service from the station to the site should also be looked at. If deemed necessary, those should also be secured through section 106 or conditions.

London Development Agency (LDA) comments

The LDA supports the principle of the proposed extension to the existing sewerage works as contributing to additional employment opportunities and generally conforming to the objectives of the Economic Development Strategy and relevant policies of the London Plan.

Policy 3B.11 of the London Plan aims to improve the skills and employment opportunities for Londoners. Local residents and businesses should benefit from the creation of jobs resulting from the construction and operational phases of the development. Initiatives to create training and employment opportunities and to utilise the goods and services of SME’s and local businesses could be formalised through a Section 106 Agreement between the applicant and the London Borough of Bexley or planning condition. An employment and training strategy should cover the following elements:

- Timing and arrangements for its implementation including funding arrangements (if through a s106 Agreement).
- A stakeholder charter to ensure initial and subsequent employers within the completed development participate in the implementation of the strategy.
- Minimum local recruitment targets for employees and targets for the involvement of local businesses and measures to be undertaken by the applicant to meet with these targets.
- Periodical workforce and business monitoring and reporting of the results to the Council and such other parties as may be set out in the approved strategy.
- A programme for skills training for local residents and/or businesses, including the potential for the provision of suitably equipped training premises.
- Local publicity, awareness raising proposals and methods for advertising employment opportunities and impending contracts which includes:
  - Initiatives to promote the involvement of local businesses including sub-contracting
and the supply of goods and services.
- Initiatives to promote the employment of small and medium businesses.
- Initiatives to promote the employment of black and ethnic minority owned businesses.

The delivery of such initiatives will assist in ensuring the regeneration benefits of the proposed development are maximised for local residents, and that the objective to tackle barriers to employment set out in the Economic Development Strategy is met.

Policy 3A.17 of the London Plan requires the adequate provision of social infrastructure. The Agency would therefore encourage the Council to consider any additional needs resulting from the intensification of the existing sewerage treatment works, such as a financial contribution for off-site childcare facilities and public transport improvements, as a means of tackling barriers to employment.

In conclusion, the Agency supports the principle of the proposed development, subject to the comments made above.

Local planning authority’s position

The view of Bexley Council was not known at the time of writing this report.

Legal considerations

Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Bexley Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. 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 comments unless specifically stated.

Financial considerations

There are no financial considerations at this stage.

Conclusion

Considering the fact that existing infrastructure is in place, it is considered appropriate that complimentary infrastructure takes place at this site to enable the STW to work at capacity however it is important that the following factors are taken on board:

- The buildings proposed should respect the setting of the listed buildings and conservation area designation.
- Whilst the development requirements on MOL have been clearly justified, further work is required by the applicant to demonstrate compliance with the Mayor’s energy hierarchy and recommendations specified in the energy section of this report, together with consideration to the opportunities outlined in the East London Green Grid Framework SPG.
- The GLA recommends that the developer be required through the section 106 agreement to contribute financially to the strategic open space opportunities identified in paragraph 6.46 of the Planning Statement to offset the harm caused by inappropriate development on MOL.
- The outstanding energy information should be provided.
- Consideration should be given to the points raised in the transport section of the report.
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