



Appeal Decision

Hearing Held on 21 January 2020

Site visit made on 21 January 2020

by C L Humphrey BA (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 7th May 2020

Appeal Ref: APP/M5450/W/19/3236789

25 Cecil Road, Harrow HA3 5QY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Cecil Road (Woolbro) Ltd against the decision of the Council of the London Borough of Harrow.
 - The application Ref P/2715/18, dated 20 June 2018, was refused by notice dated 8 March 2019.
 - The development proposed is 20 x four bedroom terraced dwellings; Three storey building to create 14 x one-bed, 6 x two-bed flats and the provision of 501sqm business floorspace (B1b/c), and 212sqm of artists' studios (B1c); Associated parking; Cycle and refuse storage; Landscaping.
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Decision

1. The appeal is dismissed.

Procedural Matters

2. During the course of the application the scheme was amended, and the description of development was revised to reflect these changes. I have considered the appeal proposal on the basis of the revised description of development set out on the Council's decision notice and the appeal form, since no party would be prejudiced or caused any injustice by my doing so.
3. After the Hearing, the Council submitted a letter and associated appendices regarding the affordable housing offer and housing land supply and delivery. I considered this information to be material to my decision. Therefore, in accordance with Rule 14(3) of The Town and Country Planning (Hearings Procedure) (England) Rules 2000 the appellant was afforded an opportunity of making written representations or of asking for the re-opening of the Hearing. In reaching my decision, I have taken account of the written representations received from the appellant in relation to these matters.
4. In December 2019, the Mayor of London issued the plan he intended to publish. This was the subject of discussion at the Hearing. Subsequently, the Secretary of State wrote to the Mayor on 13 March 2020 and issued an Annex containing directions setting out modifications. The directions relating to industrial land are relevant to the appeal; the parties have submitted written representations on this matter, and I have had regard to these in reaching my decision.

5. A completed planning obligation under s106 of the Town and Country Planning Act 1990 (as amended) ('the s106') was submitted after the Hearing. This would secure a travel plan, carbon offset contribution, employment of the scheme architect in an executive role until practical completion, connection to a centralised energy centre, construction training and employment programme, landscape works, affordable housing, delivery and management of artists' studios and low cost business space, prohibition on parking permits and a highway contribution relating to vehicular waiting time restrictions. I have had regard to the obligations in the s106 during my consideration of this appeal.

Main Issues

6. The effect of the appeal proposal on the supply of industrial land and floorspace in the borough and on flood risk.

Reasons

The site

7. With a long rectilinear form bounded by a mainline railway line to the south and Cecil Road to the north, the appeal site is surrounded to the south, west and east by industrial and employment land uses. Beyond Cecil Road, to the north, the area is predominantly residential.
8. The site is occupied by a scattered series of units and used as a maintenance and storage facility for vehicles, skips, plant and machinery. At the Hearing, the Council considered that this was a *sui generis* use of an industrial nature. Based on the evidence before me, I see no reason to take a different view.

First Main Issue: Industrial land and floorspace

Policy context

9. The site is located in a designated Business Use Area and the Harrow and Wealdstone Opportunity Area as defined by the Harrow Council Local Policies Map and the Harrow Council Harrow and Wealdstone Area Action Plan (AAP).
10. The AAP covers the 'Heart of Harrow', identified as a priority area for regeneration and designated in the Harrow Council Core Strategy (CS) as an intensification area. The Heart of Harrow is made up of seven sub areas. Paragraph 5.2 of the AAP sets out that 'within each sub-area, sites with significant opportunities for development and change have been allocated'. It continues, 'for each site, expectations are set out relating to land use.... A leading use(s) and supporting uses are specified to direct the nature of the acceptable mix of uses for the site. Leading uses are those that make an essential contribution to delivering the objectives of this Plan and should form principal components of proposals for each site. Supporting uses are uses compatible with the leading use(s) that may form ancillary components of the overall mix of uses proposed on a site.'
11. The appeal site lies within the AAP Wealdstone West sub area, which contains allocated Opportunity Sites 01 - 04. Although it is not included within the boundary of Opportunity Site 03, as drawn on the Harrow Council Local Plan Policies Map and in figure 1.1 of the AAP, the appeal site is referred to in the 'Site description' in Chapter 5.

12. At the Hearing the Council stated that, at the time of allocation, it wasn't clear how much land would be needed to achieve the key site objectives of providing a new secondary school and reconfiguring the open space, so the description included surrounding sites. This is evinced in the 'Design considerations' listed under AAP Site 03, which include 'Whether opportunities for enhanced design, access arrangements, layout of shared facilities, and reconfigured open space/playing field's warrants acquisition of some or all of the neighbouring industrial land.'
13. There are clear discrepancies between the site allocation boundary as drawn and the extent of the site allocation as described in the AAP. Consequently, there was discussion at the Hearing about whether the appeal site forms part of an allocated business and industrial site within Chapter 5, as described in AAP Policy AAP15(B), or whether it is non-allocated business and industrial land as referred to in Part C of the policy.
14. If I were to accept the appellant's argument that the appeal site forms part of the AAP Site 03 allocation, the proposal should be assessed against Part B of AAP Policy 15. However, Part B refers to 'Proposals for enabling mixed use development'. The school has now been built and the key site objectives have been achieved without the need to acquire any of the wider site referred to in the site description. Therefore, the appeal proposal cannot constitute 'enabling' mixed use development and so is not supported by AAP Policy AAP15(B).
15. Even if I were to accept the Council's reasoning that the appeal site is non-allocated business and industrial land, it would be necessary to demonstrate that the proposal met the criteria in both Parts B and C of the policy. I have considered these matters below.
16. In any event, having considered the arguments from both sides, I do not consider the matter to be determinative in this case.
17. Policy 4.1 of the London Plan (LP) seeks to develop London's economy by, *inter alia*, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost. LP Policy 4.4 sets out to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses, and plan, monitor and manage release of surplus industrial land.
18. CS Policy CS1(O) sets out that the borough's stock of business and industrial premises will be monitored and managed to meet economic need and, having regard to the most up-to-date monitoring of the demand and supply balance, any release of surplus stock for other uses will be considered in accordance with a sequential approach.
19. The Harrow Council Development Management Policies Local Plan (DMPLP) Policy DM31 states that the loss of industrial and business land and floorspace to non-employment uses will only be permitted having regard to CS Policy CS1(O) and where it can be demonstrated that a site is no longer suitable and viable for its existing or an alternative industrial or business use, and a suitable period of continuous marketing activity has been undertaken without success.
20. Among other things, AAP Policy AAP3 requires proposals for the development of identified Opportunity Sites within the three Wealdstone sub areas to be in general conformity with the site objectives and development parameters for each site set out in Chapter 5.

21. The London Industrial Land Demand study 2017 identifies Harrow's industrial land vacancy rate as being below the London average. Based upon net demand projections, it recommends that Harrow seeks to retain its capacity to accommodate industrial activity.
22. The direction setting out the Secretary of State's modifications in respect of industrial land in the draft emerging London Plan deletes policy reference to 'no net loss of industrial floorspace capacity'. It also amends the wording of the supporting text to Policy E4, referring to the need to *provide* rather than *retain* sufficient industrial, logistics and related capacity. Nevertheless, the Secretary of State's modifications do not alter Part A of Policy E4 of the emerging draft London Plan, which states 'A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained'. Whilst policies that are the subject of the direction cannot currently be adopted, I give material weight to the relevant policies of the emerging draft London Plan.

Supply of industrial land and floorspace in Harrow

23. The London Borough of Harrow Economic Development Needs Assessment 2017 (EDNA) identifies at paragraph 3.2 that 'the total stock of employment space in Harrow decreased by 32% between 2000/01 and 2015/16'. It goes on to state that 'both industrial and office floorspace decreased over the time period, with industrial floorspace having a greater loss.' Paragraph 3.45 of the EDNA recognises that the majority of Harrow's industrial stock is 'relatively dated', but finds that 'Nevertheless, local agents report strong levels of demand and in light of limited supply this results in low levels of vacancy across the Borough.' It concludes, at paragraph 7.22, that 'the Council should seek to carefully manage losses of industrial space going forward, encouraging renewal and recycling so that outdated buildings are upgraded or replaced rather than lost to other uses.'
24. The West London Employment Land Evidence 2019 (WLELE) was commissioned by the West London Alliance of the London Boroughs of Ealing, Brent, Barnet and Harrow. It shows, at paragraph 3.5, that Harrow has just 8% of the industrial floorspace in the study area. Furthermore, paragraph 7.10 notes that, since 2001, Harrow has lost 34% of its industrial floorspace. It goes on to state 'Compared to boroughs like Brent or Ealing, or Greater London as a whole, Harrow has lost a greater proportion of stock from a lower base.' Table 69 of the WLELE indicates that Harrow's industrial land needs equate to a total of 2.48ha.

Whether site is suitable and viable for existing use

25. The appeal site is not a Locally Significant Industrial Site or Strategic Industrial Land and is located away from the strategic road network. Moreover, the appellant asserts the site is underutilised, and the EDNA deemed it to be 'poor quality'. Nonetheless, the parties agreed at the Hearing that the site is a Non-Designated Industrial Site. It remains in active use and provides a maintenance and storage facility which supports the local economy. The operation and functional appearance of the site is wholly appropriate to this use. The London Borough of Harrow Employment Land Review 2010 concludes that the site 'appears to be meeting the needs of its current users'. I have no evidence to demonstrate it is no longer suitable and viable for its existing use.

Whether site is suitable and viable for an alternative industrial or business use

26. Appendix 6 of the appellant's Employment Land Report (ELR) includes viability appraisals which appear to show that alternative employment uses of the site would not be viable. However, they were produced more than 2 years ago and therefore the viability evidence underpinning the assessments is not up to date. Moreover, the ELR describes them as 'high level viability assessments' and provides little detail about the nature and form of alternative uses considered.
27. The ELR outlines that the site is constrained by its narrow depth, the culvert on the Cecil Road frontage and the railway line and avers this would prevent adequate circulation space for industrial development and raise issues including site densities, loading depths and access. The report also highlights limited nearby parking provision, a road width restriction to the north and a low railway bridge to the south, and the proximity to residential development. Nevertheless, I note that there are other business and industrial uses on similarly constrained plots along Cecil Road and Tudor Road. These factors have not prevented their development and do not appear to be hampering their continued operation.
28. Unauthorised intensification of part of the site in the past led to complaints from neighbouring residents and enforcement action. However, this does not in itself demonstrate that it would not be possible to achieve some form of appropriate intensification of the industrial floorspace on the site.
29. The letter from the landowner, McGovern Brothers (Haulage) Ltd, dated 5 September 2019 states that the tenants in occupation are 'aware the site has been marketed'. However, I have not been provided with any evidence to show that a suitable period of continuous marketing activity has been undertaken without success. Whilst the ELR points to pre-application discussions with Council officers when it was confirmed that marketing would not be required, the Council's email dated 22 April 2015 makes clear this was on the basis that suitable replacement employment space was provided within the site.
30. Overall, there is no substantive up to date evidence before me to demonstrate that the site would not be suitable and viable for an alternative industrial or business use. The lack of any market investigation means that this possibility cannot be ruled out.

Alternative sites for existing use

31. The appellant's Addendum Employment Land Report notes that 'Labour and property markets extend across boundaries.' Further to the letter from McGovern Brothers (Haulage) Ltd, at the Hearing the appellant provided details of 2 sites the landowner has in the London Borough of Brent which could be made available to relocate the appeal site's current tenants. While suitable alternative land may be available in the wider market area for the existing use, this in itself does not justify the loss of land in industrial use in Harrow to a mixed use development.

The proposed provision

32. There is support within both the development plan and emerging draft London Plan for the efficient use of land and delivery of intensified industrial floorspace capacity on existing industrial sites. Indeed, Harrow and Wealdstone is designated as an intensification area and a focus for significant development,

growth and investment. However, what is proposed is not intensified industrial floorspace. Rather, it would result in the redevelopment of a site in industrial use for a mixed use scheme which would include a fairly modest element of Class B1(b)/(c) floorspace on less than half the appeal site, alongside a substantial amount of residential development.

33. The existing use generates around 5 full time on-site jobs, whereas the evidence suggests that the proposed development could create up to 25 jobs on site – 18 jobs within the proposed 501sqm B1(b)/(c) and 7 within the B1(c) artists' studios. It is clear, therefore, that the appeal proposal would result in a greater employment yield.
34. A letter from the Association for Cultural Advancement through Visual Art (ACAVA) states there is considerable demand in Harrow for affordable workspace for artists and anticipates the proposed artists' studios would be quickly occupied. The letter from Brasier Freeth Chartered Surveyors offers a more qualified response to the proposed B1(b)/(c) element of the scheme and concludes that 'while the market appeal is narrow, there are occupiers who will find this accommodation attractive.' This is echoed in the letter from office agency Ferrari Dewe. On the basis of this limited evidence, it seems there would be some demand for the proposed low cost and affordable workspace.

Conclusion on first Main Issue

35. Overall, whilst the development would result in a greater employment yield than at present, the evidence before me demonstrates that there is a clear need to retain the appeal site for industrial use. I have no evidence that the site is no longer suitable and viable for its existing use, or that it is not suitable and viable for alternative industrial or business use. Consequently, I conclude that the appeal proposal would have a harmful effect on the supply of industrial land and floorspace in the borough and would conflict with LP Policies 4.1 and 4.4, CS Policy CS1(O), DMPLP Policy DM31 and AAP Policies AAP3 and AAP15.

Second Main Issue: Flood risk

Sequential approach

36. The National Planning Policy Framework (Framework) states, at paragraph 155, that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.' The Framework sets out a sequential, risk-based approach to the location of development which aims to steer new development to areas with the lowest risk of flooding. It makes clear at paragraph 158 that 'The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.'
37. Framework paragraph 159 goes on 'If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.'
38. LP Policy 5.12 states that 'development proposals must comply with the flood risk assessment and management requirements' set out in the Framework. CS Policy CS1(U/V) requires development to be 'managed to achieve an overall reduction in flood risk and increase resilience to flood events.' Policy DM9 of the

DMPLP states 'proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.' Finally, Policy AAP9 of the AAP stipulates, among other things, that proposals must demonstrate that the development is designed and laid out to be resistant, resilient and safe from all sources of flooding.'

39. With reference to the flood risk vulnerability classification, as set out in Table 2 of the Planning Practice Guidance (PPG) on flood risk and coastal change, the submitted Flood Risk Assessment (FRA) dated 12 June 2018 identifies the proposed development as 'more vulnerable'.
40. The FRA states at paragraph 4.2 'The Environment Agency Flood Map... shows that the site is located in Flood Zone 1; however, in the Addendum to the level 2 SFRA the map for the modelled extents of the Wealdstone Brooke... shows the site is on the very edge of modelled Flood Zone 2.' Under the heading 'Sequential Test', at paragraph 4.3, the FRA refers to PPG Table 3: flood risk vulnerability and flood zone 'compatibility' and concludes 'the development is appropriate for both zones 1 and zones 2 and therefore the exception test is not required.'
41. However, the FRA does not take into consideration the level 1 West London Strategic Flood Risk Assessment (WLSFRA) dated April 2018. This identifies that the site lies partly within Surface Water Flood Zone 3a, defined as having a high probability of flooding.
42. Moreover, as confirmed at paragraph 5.87 of the appellant's statement of case, the appeal site is also located within a Critical Drainage Area (CDA). Heavy rainfall and severe weather leave CDAs at risk from multiple flood risk sources, mainly surface water flooding but often interrelated with sewers and/or watercourses. The appellant's Surface Water Flood Risk Note states 'The surface water flood risk is linked to a flow path that runs from west to east along Cecil Road fed from a larger urban catchment. This flow path is believed to be associated with the culverted watercourse beneath the site.'
43. On the basis of the evidence before me, the sequential approach required by national and development plan policy has not been properly followed in this case. Furthermore, even if it were demonstrated that there were no reasonably available sites within Flood Zones 1 and 2, as 'more vulnerable' development on land which lies partly within Flood Zone 3a, it would be necessary to apply the exception test. I have no evidence that this has been undertaken. Without proper application of the sequential test and, if necessary, the exception test, it is not possible to establish whether the principle of development is acceptable with regard to flood risk.

Flood risk management and mitigation

44. Even if the sequential test were passed and both elements of the exception test satisfied, based on the plan¹ submitted by the appellant at the Hearing, the proposed removal of the boundary wall that runs along Cecil Road and the lowering of site levels to accommodate drives in front of the dwellings would enable more of the site to flood than at present. The plan shows that the additional floodplain would extend up to the front building line of the houses.

¹ Post-Development Surface Water Flood Compensation 191950-002 Rev A.

45. At the Hearing, the appellant confirmed that a dry means of escape was not possible. On that basis, and in the absence of an emergency plan as required by Framework paragraph 163 and the WLSFRA, there is insufficient information to demonstrate that the appeal proposal would allow residents and users to safely access and exit the development during a flood event.
46. Details of flood resistance and resilience measures to be incorporated into the construction of the buildings could be secured by condition. However, the PPG is clear that 'flood resistance and resilience measures should not be used to justify development in inappropriate locations.'

Ordinary watercourse

47. On the basis of the submitted evidence and discussion at the Hearing, I am satisfied that, subject to a suitably worded planning condition, the appeal proposal would not adversely affect the ordinary watercourse beneath the site.

Conclusion on second Main Issue

48. Overall, for the reasons above, I conclude that it has not been demonstrated that there are no other reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding and, if not, that the appeal proposal would provide wider sustainability benefits to the community that outweigh the flood risk and will be safe for its lifetime, without increasing flood risk elsewhere. Consequently, the appeal proposal fails to comply with the Framework and LP Policy 5.12, CS Policy CS1(U/V), DMPLP Policy DM9 and AAP Policy AAP9 which seek to protect people and property from flooding.

Other considerations

49. In addition to the increased employment yield on the site outlined above, the scheme would create job opportunities during the construction phase, with a construction training programme secured through the s106. Future occupants would spend in the local area, thereby supporting shops and services, and the development would generate tax revenue for the Council.
50. The appeal proposal would provide 40 accessible residential units, including 20 family houses and 20 flats, which could be brought forward in the immediate future. On the basis of the evidence before me, the Council can demonstrate a five year supply of deliverable housing sites and delivery is above the housing requirement. However, there is significant unmet housing need in London overall; the scheme would make a modest contribution towards meeting this. Furthermore, the s106 would secure much needed affordable housing. All the proposed residential units would be affordable, comprising 14 London Affordable Rented Units and 26 Shared Ownership Units.
51. Making efficient use of previously developed land in an accessible location, the scheme would be of a high quality design, sympathetic to neighbouring development, and would introduce additional soft landscaping and active frontages along Cecil Road. The development would utilise sustainable design and construction techniques, incorporate energy efficiency and renewable energy measures, be air quality neutral and achieve net gains in biodiversity.
52. I note the appellant has sought to respond positively to the refusal of an earlier planning application, successfully addressing several previous reasons for refusal, and that the appeal scheme has the support of some local residents.

Planning Balance and Conclusion

53. The proposed development would result in the loss of a site in industrial use. Based upon the evidence before me, there is an identified need for Harrow to maintain its capacity to accommodate industrial activity. The appeal proposal would therefore have a harmful effect on the supply of industrial land and floorspace in the borough. There would be conflict with LP Policies 4.1 and 4.4, CS Policy CS1(O), DMPLP Policy DM31 and AAP Policies AAP3 and AAP15.
54. The sequential, risk-based approach to the location of development as set out in the Framework and relevant development plan policies has not been followed in this case. It has not been demonstrated that the appeal proposal would protect people and property from flooding. Thus, there would be conflict with LP Policy 5.12, CS Policy CS1(U/V), DMPLP Policy DM9 and AAP Policy AAP9.
55. Set against the identified harm, the appeal scheme would provide new, good quality Class B1 premises, providing affordable workspace for small businesses including the creative sector. There would be a marked increase in the number of jobs provided at the site. These would be benefits of significant weight.
56. The scheme would make good use of brownfield land, provide a sensitive design response appropriate to the local context and incorporate sustainable construction measures, landscaping and biodiversity gains. These benefits have significant weight.
57. Other economic advantages of the scheme include the jobs generated during the construction phase, together with increased spending in the local economy following occupation. These benefits have moderate weight.
58. The development would provide 40 accessible new homes which would help boost housing supply in accordance with the Framework. That 100% of these homes would be affordable, with a policy compliant tenure mix, would be a significant benefit. However, the weight these matters can be afforded is limited because it has not been demonstrated that the terraced houses and their future residents would be protected from flooding.
59. There are some policies in the development plan that support the scheme. However, the most important policies to the determination of this appeal are those referred to above with which it would conflict. In such circumstances the appeal proposal would not accord with the development plan as a whole.
60. Due weight should be given to existing policies according to their degree of consistency with the Framework. The Framework seeks to support economic growth by ensuring that sufficient land of the right types is available in the right places and at the right time. Moreover, it makes clear that inappropriate development in areas at risk of flooding should be avoided. Even considering the Framework objectives to increase housing and make efficient use of land, the conflict between the appeal proposal and the development plan policies set out above should be given substantial weight.
61. The Council can demonstrate a five year supply of deliverable housing sites and delivery is well in excess of the housing requirement.
62. In such circumstances the normal planning balance applies, and Paragraph 11 of the Framework is not engaged.

63. The benefits that I have identified above would be of considerable importance. However, I do not consider that these benefits would outweigh the harm that would arise from the proposed development, which together are matters of substantial importance. The appeal proposal conflicts with the development plan when taken as a whole. There are no material considerations, including the provisions of the Framework, which indicate that the decision should be taken otherwise than in accordance with it. Therefore, the appeal is dismissed.

CL Humphrey

INSPECTOR

APPEARANCES

FOR THE APPELLANT: CECIL ROAD (WOOLBRO) LTD

Saira Kabir Sheikh	of Queen's Counsel, instructed by Cecil Road (Woolbro) Ltd
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Alun Evans	ROK Planning
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Steve Burton	Ardent Consulting Engineers
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FOR THE LOCAL PLANNING AUTHORITY: COUNCIL OF THE LB OF HARROW

Nabeel Kasmani	Principal Planning Officer
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Callum Sayers	Planning Policy
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Anthony Donetti	Drainage and Infrastructure
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DOCUMENTS SUBMITTED AT AND AFTER THE HEARING:

1. Harrow Council Local Plan Policies Map
2. The London Borough of Harrow Employment Land Review 2010
3. West London Employment Land Evidence 2019
4. Letter to Planning Inspectorate from ROK Planning dated 20 December 2019
5. Maps indicating suggested alternative sites
6. Extracts from West London Strategic Flood Risk Assessment
7. Cecil Road – Flood Extent
8. Cecil Road – Surface Water Flood Depth
9. Cecil Road – Surface Water Flood Velocity
10. Cecil Road – Surface Water Flood Hazard

11. 191950-001 Rev A - Pre-Development Predicted Surface Water Flood Extent
12. 191950-002 Rev A – Post Development Surface Water Flood Compensation
13. Harrow Council Harrow and Wealdstone Area Action Plan (received by email dated 22 January 2020)
14. The London Plan Intend to Publish version December 2019 (received by email dated 22 January 2020)
15. London Industrial Land Demand study 2017 (received by email dated 22 January 2020)
16. List of Conditions – agreed position (received by email dated 28 January 2020)
17. s106 planning obligation (received by email dated 4 February 2020)
18. Letter from the Council regarding 100% affordable housing offer and housing land supply and delivery, together with Appendix A - 5 Year Supply note, schedule of sites and housing trajectory (received by email dated 4 February 2020)
19. Letter from ROK Planning in response to item 18 above, together with correspondence relating to PA Housing Ltd affordable housing offer (received by email dated 24 February 2020)
20. Letter from ROK Planning regarding Secretary of State's letter and associated directions dated 13 March 2020 in respect of the emerging draft London Plan (received by email dated 27 March 2020)
21. Letter from the Council in response to item 20 above (received by email dated 21 April 2020)