



Appeal Decision

Hearing held on 27 June & 26 July 2023

Site visits made on 26 June, 27 June & 26 July 2023

by Mr JP Sargent BA(Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 27 September 2023

Appeal Ref: APP/F5540/W/22/3302124

17 Hartington Road, Chiswick, London W4 3TL

- 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 Residence One Hartington Ltd against the decision of London Borough of Hounslow.
 - The application Ref 00567/17/P6, dated 8 July 2021, was refused by notice dated 17 January 2022.
 - The development proposed is alterations to the main house involving its conversion back to a single family house comprising
 - demolition of modern extensions and garage,
 - the erection of a single storey rear extension and outbuilding,
 - alterations to the driveway and front garden,together with the development of 4 houses within the south-western section of the site, with associated parking, landscaping and all ancillary works.
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Decision

1. The appeal is dismissed.

Application for costs

2. An application for costs was made against the Council by Ms Campion on behalf of a group of local residents, and that is the subject of a separate decision.

Main Issues

3. The main issues in this case are
 - a) whether the development fails to preserve the character or appearance of the Grove Park Conservation Area and its effect on a non-designated heritage asset;
 - b) whether it would give rise to unacceptable risk from flooding;
 - c) the effect on ecology and biodiversity and
 - d) if any harm would be caused by any of the above leading to development plan conflict, whether it is outweighed by public benefits or other considerations.

Reasons

Conservation area & non-designated heritage asset

4. The Grove Park Conservation Area comprises a range and diversity of building forms and types, from the tighter terraced streets and older properties at the

northern end, through Victorian villas and avenues of 20th Century housing, to the relatively modern riverside developments in the south and the expansive playing fields. As a result, with its varied building forms and layouts, its significance lies, partly, in the way it displays the evolution of the area over time, and its response to differing demands, styles and pressures.

5. The appeal property is on the west side of Hartington Road, and was built in the late 19th Century as a large detached house. Although subsequently subject to various alterations and modifications, its design and its remaining external detailing still show it to have been a property of some status from that period. These factors therefore reinforce its significance as a non-designated heritage asset and mean it adds to the significance of the conservation area.
6. To the north of No 17 along this side of the road is a lengthy run of detached and semi-detached properties that are mainly dwellings that date from the late 19th and early 20th Centuries. Again, these still reflect detailing and design typical of their respective eras, and so are understandably identified by the Council as positive contributors to the conservation area.
7. Behind No 17 and this run of properties to the north tend to be found very long gardens indeed that run down to the River Thames. I was told that the intention had been to construct a further row of houses behind them facing the river but, when this did not happen, the land was offered for sale to the occupiers of the houses fronting Hartington Road. In the case of No 17 though, the neighbour declined to buy the land for whatever reason, and so it was bought by the owners of the appeal property. Consequently, once past the smaller garden behind No 19, the garden at No 17 is in effect 'double width' for much of its length.
8. Overall, these gardens form a sizeable and heavily treed area of mature and established planting, that creates a semi-rural, landscaped context for the housing and emphasises the sense of status that these properties enjoyed. Moreover, the trees at the end of these gardens line the relatively informal riverbank for an appreciable distance. As a result, when looking from the Thames Path on the opposite side of the river, they soften the sense of being within a large city by concealing the houses to a great extent, and instead create the impression of being a wooded area. Although a variety of summer houses, outbuildings, jetties and terraces continue to be seen along the riverbank, these are very much minor ancillary features that do not compromise or undermine this sense. Therefore, when seen from across the river, the nature of the gardens behind No 17 and the properties to its north also make a valued contribution to the character and appearance of the conservation area.
9. However, on the west side of Hartington Road the form and nature of development established by No 17 and the houses to the north with their large rear gardens, stops immediately to the south of the appeal site. I was told that 1-15 Hartington Road, which were comparable to No 17 and the older properties to the north, had been cleared in the mid 20th Century and replaced by 3 complexes of flats and houses. Each of these complexes extend back from the road to the river, and have properties laid out on a north/south arrangement as well as facing east/west. Whilst they too sit within landscaping that complements their appearance, this is of a very different nature to that of the extensive gardens behind No 17 and to its north, as it is within a far denser

- urban environment. Overall though each complex comprises a cohesive entity, and they have a pleasing form that means they add positively to the diversity across the conservation area.
10. When seen from the opposite bank, instead of the softening effects of the trees and the informal riverside, these complexes have dominant quays or similar, with terraced residential accommodation a few metres back and clearly visible. From this direction there is therefore a far greater awareness of built form at the complexes than is appreciated at No 17 and the properties to its north. I accept that in winter months the depth of the complex next to the appellant's property, which is called Chiswick Staithe, might well now be apparent from this direction over the appeal site. That though is only the case for part of the year, and even then is substantially filtered by intervening trees. In any event, those existing buildings would be read very much as part of that distinct and different development, rather than as part of the pattern of built form found at No 17 and the properties to the north.
 11. The effect of these complexes in general, and Chiswick Staithe in particular, means the historic context of No 17 has changed. Instead of being in the midst of a run of similar properties it is now at the end of the row, adjacent to modern intensive development. However, Chiswick Staithe is separated from the appeal property by a straight wall that runs from Hartington Road to the river, and it is of a relatively high density at depth. These factors mean it is sharply and abruptly distinct from No 17 and the villas that extend northwards with their long, treed gardens. Indeed in the *Grove Park Conservation Area Appraisal* the complexes are identified as forming their own character area within the conservation area. As such, the change in context brought about by the clearance and redevelopment of the original buildings to the south of No 17 does not have an appreciable effect on the contribution the appeal site and the properties to the north make to the conservation area.
 12. The 4 new houses now proposed would draw design inspiration from the terrace of townhouses immediately adjacent on Chiswick Staithe. Whilst they would be separated at upper floor level to create 2 pairs of semi-detached houses rather than a terrace of 4 units, they would nonetheless rise to a similar height to those adjacent properties, and would be set back a comparable distance from the river.
 13. They would not have a formal quay as such but, when seen from the opposite bank to the west, the effect on the riverbank and the scale, design and form of the houses would reflect the Chiswick Staithe complex rather than the gardens to the north. To my mind, in this view they would therefore be a notable feature, that would erode the sense of informal woodland along this part of the bank to the Thames that makes a positive contribution to the conservation area. Consequently, the scheme would harm the conservation area's character and its appearance, and this would not be outweighed by any sense of 'liveliness' it may bring.
 14. Looking from the east and south, the development would be clearly visible from the houses fronting onto Hartington Road, as well as from some of the houses on Chiswick Staithe. Moreover, the Chiswick Staithe access road would also allow views of the proposal from Hartington Road itself.
 15. From these points, the 4 houses would constitute a notable and bulky encroachment of built form into this area of mature gardens, to some extent

appearing as an extension of the neighbouring complex. Certainly during the early years it would not be significantly screened by trees, and over time, I am by no means certain the constraints of the site would allow the new planting to mitigate its visual presence to any material degree. Whilst the scheme's overall housing density may be relatively low, and while the houses may have large plots compared to those on Chiswick Staithe, the density and garden sizes would be notably at odds with what is found at No 17 and the properties to the north.

16. Their design would reflect the Chiswick Staithe terrace adjacent, but that existing terrace is seen very much in the context of the more intensive development between it and Hartington Road. In contrast, and mindful of the distinct and clear separation between the sites (reflected in the different character area designations), the scheme before me would not be in a similar context to that adjacent terrace. As such, I find it would be discordant.
17. Indeed, the sharpness and abruptness of the separation between Chiswick Staithe on the one hand and the garden area to its north on the other means that, at the moment, the distinctive nature of each is readily defined and contained, as is the contribution they make to the conservation area. To my mind, by extending housing that reflected the appearance of Chiswick Staithe into the area of gardens to the north of that complex, this scheme would blur and dilute this strong distinction, diminishing the character of the garden area behind No 17 and the houses to its north, and so harming the significance of the conservation area as a consequence.
18. Finally, No 17 and most of the properties to the north have had a historic link to the river, that has been both actual (the gardens have run down to the water's edge) and visual (there has been an awareness of the river and the openness it provides). However, access to the river would be confined to a narrow passage along the northern boundary. Moreover, while there would be gaps between the 2 middle dwellings in the scheme and between the southernmost house and 1 Chiswick Staithe, the narrowness of these and the depths of the houses mean that any views through would be glimpses and any sense of permeability would be limited. I therefore find that the historic link between No 17 and the river would be very much reduced and eroded.
19. Consequently, looking from this direction I consider the proposal would represent a notable encroachment of built form that would be appreciably at odds with the extensive area of gardens that runs from No 17 northwards. This would result in it detracting unacceptably from the semi-rural nature of this area and diminishing the contribution it makes to the status of the houses to the front and, in the case of No 17, its historic context. Therefore, it would not preserve the character or the appearance of the conservation area.
20. Given the great variety of house types that it contains, this is not a conservation area where the emphasis should be on maintaining a single pattern or form of development. I do not question the quality of the architecture of itself. New proposals though still have to respond appropriately to their context, and for the reasons above I find that is not the case in this instance.
21. The proposal would offer a 'softer' northern gable than the existing large plain one that now forms the side elevation of 1 Chiswick Staithe. However, the impact of the gable to No 1 is not experienced over a wide area and so

mitigating any adverse effects it might cause and providing a more appropriate termination of that terrace is not something to which I attach any appreciable weight.

22. There would be some benefits to the non-designated heritage asset of No 17 due to the improvements to its external appearance and its front garden, and it being brought back into use as a dwelling, and these in turn would also be to the conservation area's benefit. To my mind though any such benefits do not outweigh the harms I have identified to the conservation area. Furthermore, when these factors are balanced against the adverse effects of building to its rear and diminishing its connection to the Thames, I find the significance of the non-designated heritage asset would, overall, be diminished.
23. There was a further concern that the projection of the scheme forward of the front elevation of 1 Chiswick Staithe would detract from the character and appearance of that complex. The varied building lines already found there though mean I consider the impact in this regard would not be unacceptable.
24. Accordingly, I conclude that the proposal would not preserve the character or the appearance of the Grove Park Conservation Area. As a result, it would cause harm to its significance, though mindful of its scale in relation to the conservation area as a whole, I acknowledge such harm would be less than substantial. Moreover, the scheme would also cause harm to the significance of the non-designated heritage asset.

Flooding

25. I was told that the appeal site and the gardens to its north used to be osier beds that were at that time regularly flooded by the river. However, in the mid to late 19th Century an embankment was formed along the river's edge to prevent such flooding, and the land behind became the gardens of the Hartington Road houses once they were built. This embankment is still there, and it runs along this side of the Thames behind the appeal site and the houses to the north. Moreover, in the 1980s a continuous brick wall was built along the top of the embankment, and raised the defence's height by some 700mm (the embankment and the wall together I shall refer to as the defences).
26. On the map accompanying the West London Strategic Flood Risk Assessment (SFRA), the existing building at No 17 and the houses to the north are not in Flood Zone 3, while the middle portion of the appeal site is in Flood Zone 3a. However, the end of the garden where the new houses are to be built is in Flood Zone 3b, and this designation is shown as extending from the side wall of 1 Chiswick Staithe northwards through the extensive garden areas, and joins the river itself a little to the north of No 17. It was agreed that if there were to be a tidal or fluvial flood and there was an inundation, given the existing ground levels the water could be up to 2.59m in depth on this part of the site.
27. Having regard to the *Planning Policy Guidance* (the PPG) and the *National Planning Policy Framework* (the Framework), Government guidance states that inappropriate development at areas at risk of flooding should be avoided. To this end, 'more vulnerable' uses such as buildings used for dwelling houses should not be permitted in Flood Zone 3b. As such, this would be a basis to resist the scheme, unless material considerations indicated otherwise.

28. The SFRA map should not determine where is or is not functional floodplain, but rather it should reflect where such floodplain is actually found. No technical flooding data or anecdotal evidence from long-term residents was submitted to show the site had experienced tidal or fluvial flooding since the construction of the defences, reflecting their effectiveness. Indeed, in the greatest flood event to which I was referred, water came up to the bottom of the wall. As a result, and despite the designation in the SFRA map, I acknowledge that no one has shown that the garden to No 17 had in fact performed a role as functional floodplain.
29. The Council's specific concern was around the integrity of the defences, and this was shared by local residents. However, the condition of the wall along the entirety of the embankment is regularly inspected by the Environment Agency, and there are requirements on the land owners to maintain it, and to increase its height by certain specified dates to accommodate increased flood risk over time. Moreover, conditions were suggested to mean that, if the scheme was allowed, the structural states of the embankment and the wall, as they crossed the end of the site, would need to be assessed and, if necessary, addressed. The effect of any proposed works to the embankment (such as the forming of the outfall pipe) could also be controlled. I therefore have no basis to question the integrity of the site's own defences.
30. In the light of the above, and mindful that the Thames Barrier also controls flooding along this stretch of the Thames, the appellant contended there was no reason to question the future funding, maintenance, renewal and presence of the embankment and wall. As such, it drew attention to the comment in the Officer Report that a more appropriate classification of the site of the 4 new houses was as Flood Zone 3a, and further stated *'the entire site is located entirely in Flood Zone 3a'*.
31. However, as was made clear through discussions at the Hearing, the dates and requirements for modifying the height of the flood defences at this point seem to be changing over time. This is in response to the fact that the effects of climate change are increasingly expected to be more pronounced. As a result, the nature of the defences at this point into the future cannot be certain. Furthermore, any fluvial or tidal flooding of this site is linked to the gardens to the north. Consequently, its protection is dependent upon the future funding, maintenance, renewal and presence of defences at those properties too, which are outside of the appellant's control and for which no substantive evidence was submitted. I am also aware that, as the area designated as Flood Zone 3b on the SFRA map seems at present to cover only garden land behind those dwellings, maintaining the defences may well not be given the same priority as defences that protect established living accommodation. These issues therefore mean I have a certain caution in concurring with the appellant's position.
32. If I was nonetheless to adopt the appellant's approach and consider the site should be seen as being, in effect, in Flood Zone 3a, it means a sequential test should be undertaken, the aim of which is to steer new development to areas with the lowest risk of flooding. The PPG states that only where there are no reasonably available sites in low and medium risk areas should it be necessary to locate development within high risk areas. It goes on to say that the area of test will be defined by local circumstances relating to the catchment area for the type of development proposed. 'Reasonably available sites' are those in a suitable location for the type of development with a reasonable prospect that

the site is available to be developed at the point and time envisaged for the development. The onus is then on the appellant to identify whether any 'reasonably available sites' are within the area of search that have not already been identified and their status. When making this assessment, the presence of existing flood risk infrastructure should be ignored initially as its long-term funding, maintenance and renewal is uncertain. The *West London Guidance* gives further advice on this.

33. I would not anticipate that any other site is directly comparable to this one with its specific attributes, and so there will not be anywhere else with a lower flood risk where this precise scheme can be accommodated. However, the purpose of the sequential test is not to establish whether the precise scheme can be delivered elsewhere, but rather to examine whether the type of development can be directed to areas of lower flood risk. The PPG says that 'reasonably available sites' could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the development, and so it is not necessary to identify a single site that can accommodate this number of dwellings only. For a site to be 'reasonably available' it also does not need to be owned by the appellant.
34. Of the list of sites that were considered as part of the sequential test exercises, many are in Flood Zones 1 or 2 so have a lesser chance of tidal or fluvial flooding than the site before me. The appellant pointed out that the Council is allocating sites in Flood Zones 2 and 3 for housing. Again, some of these would include sites where the flood risk is less, while all would have been through the rigorous assessment approach associated with plan preparation that is found in Government guidance. It therefore does not follow that housing can be justified on any land in Flood Zone 3a in the borough. Whilst the appellant stated there was no evidence the potential identified sites owned by the Council would be available, I had nothing before me that satisfactorily justified that assertion. It was said the redevelopment of some of the other sites was likely to be contentious but such a statement is based on a degree of speculation and does not mean their redevelopment would not be accepted. Further sites were discounted because of a higher risk of flooding from other sources. This though seems to be based on the appellant addressing surface water flooding on the appeal site, and I have no evidence concerning whether similar approaches could not satisfactorily overcome this hazard at those other sites as well.
35. The appellant's sequential test states that '*in order to accommodate the proposed development, any alternative site must have an area of at least 0.2 ha (i.e. the same as the application site)*' though went on to say '*only those sites that are allocated for residential development and have an area of 0.27 ha or larger have been considered as reasonably suitable*'. Similarly, weight is placed on the Officer Report saying there was a '*lack of any equivalently sized sites in this part of Hounslow*'. I am unclear as to the basis for not taking into account unallocated sites. Moreover, 0.27ha is larger than needed for the 4 new houses, as it includes the area occupied by the existing building and what would be its garden, which of course are present now and lie outside of Flood Zone 3. Putting these points aside though, the absence of sites of the same or equivalent size to the appeal site is not necessarily decisive, as the PPG makes clear the search should not be confined to sites of a comparable size only.

36. Overall, given the size of the scheme and based on the evidence before me, even if I accept the new-build dwellings are proposed on land that is, in effect, in Flood Zone 3a, it has not been sufficiently shown that 4 houses cannot be accommodated either on a single site, a series of smaller sites or as part of a larger site in and around Hounslow that have a lesser flood risk. As such, to my mind the sequential test has not been passed.
37. In coming to this view, I accept that there is a need for housing across London, and there is a requirement to have regard to wider sustainable development objectives. However, neither of these matters justify the proposal given either the actual or the contended Flood Zone designations.
38. Accordingly, mindful of the Flood Zone designation in the SFRA and taking into account the appellant's submissions, I conclude it has not been demonstrated there are no reasonably available sites in low and medium risk areas, or that housing is otherwise justified here in the face of the possible flood risk. Accordingly, I conclude it conflicts with Policy EQ3 in the Hounslow Local Plan, and the Framework which seek to ensure flood risk is reduced by locating development appropriately.

Ecology and biodiversity

39. As the site is at present a sizeable, secluded and overgrown garden that links not just to the river but also to the large gardens to the north, it is to be expected that it currently provides foraging and habitat for wildlife.
40. The scheme would result in the removal of much of the current planting. Many of the existing trees would also be lost, which were accepted by the Council as being of low/medium value. While the appellant is proposing additional planting and an overall increase in trees, appreciable areas would nonetheless be covered by built development and smaller gardens, and its tranquillity would inevitably be replaced by more human activity, noise, disturbance and light spillage. Balanced against this, I am aware much new planting is proposed and also a high Urban Greening factor and there are to be improvements arising from the delivery of biodiversity net gain.
41. The scheme would clearly lead to a reduction in the area available for and attractive to wildlife, but such a change is not uncommon when delivering new houses. The Council has contended it is an unacceptable urbanisation and intensification of the site, but that has to be balanced against the need to make the best use of land. On the evidence before me, and having regard to the opportunities and requirements that would flow from the suggested conditions, it has not been shown that this scheme would have an unacceptable impact on ecology and biodiversity, even if some of the appellant's planting does not in fact succeed.
42. Accordingly, I conclude the development would not unacceptably affect ecology and biodiversity, so would not conflict with Policy GB7 in the Local Plan, which seeks to protect and enhance the borough's natural environment.

Other Matters

43. The separation distances are sufficient to mean the proposal would not have an unacceptable effect on the privacy or daylight enjoyed by nearby residents. Noise and nuisance during the construction phase would inevitably occur, but conditions can ensure the impact of that can be suitably mitigated.

44. Although the access and parking opportunities are limited, they would be sufficient to serve the development and would not constitute a basis to dismiss the scheme.

Public benefits and other considerations

45. I have therefore found less than substantial harm to the significance of the conservation area, harm to the significance of the non-designated heritage asset, and development plan conflict in relation to flood risk.
46. The Framework states that heritage assets are an irreplaceable resource. It adds that great weight should be given to an asset's conservation, with any harm to the significance of a designated heritage asset requiring clear and convincing justification. Moreover, if less than substantial harm is caused to the significance of any asset, that harm should be weighed against the public benefits in what I shall call the heritage balance. In relation to non-designated heritage assets the Framework says that a balanced judgement will be required, having regard to the scale of harm and the significance of the asset, and this too I will consider under the heritage balance. Local Plan Policies CC1 and CC4 are broadly consistent with the Framework in relation to this, in that they seek to conserve and enhance the significance of the borough's heritage assets.
47. A second balance is found in section 38(6) of the *Planning and Compulsory Purchase Act 2004*, which says development should be in accordance with the development plan unless material considerations indicate otherwise (the planning balance).
48. In relation to the heritage balance, I accept there is a public benefit from the delivery of more dwellings in a borough where there is a need, and I accept that biodiversity improvements are proposed. I afford these significant weight. Improvements to No 17 would be welcomed but there is little to demonstrate that the building could not be enhanced to some degree without the proposal. While it is said there would be public access to the riverbank, I have nothing to secure this or show it would be part of any meaningful, publicly accessible footpath that would be created along this side of the Thames in the foreseeable future. Economic benefits would inevitably arise from new housing and while the flood defences are to be enhanced as part of the scheme, the evidence before me does not show that they are in such a state as to mean that needs to be secured. The proposal would also reduce demand placed on the Hartington Road sewer, but there is limited evidence to show this is a problem at present. Finally, I recognize the intended sustainability credentials of the properties, though consider they could be associated with developments elsewhere and are not necessarily specific to this site. Lesser weight is therefore attached to these benefits.
49. Taken together, in a balanced judgement I consider these benefits would outweigh the harm to the non-designated heritage asset. However, mindful of the permanent impact of the scheme and in the absence of any clear and convincing justification, I consider the less than substantial harm to the designated heritage asset is not outweighed by these or any other cited public benefits. I therefore conclude that the scheme's public benefits do not outweigh the less than substantial harm to the conservation area. As such, the development conflicts in this regard with Policies CC1 and CC4 in the Local Plan, and the Framework.

50. Turning to the planning balance, I afford significant weight to the moderate benefit of 4 new dwellings, and my assessment in relation to the other material considerations are as stated in the heritage balance above. Even if all the above factors are taken together, to my mind they are clearly and demonstrably outweighed by the harm to heritage assets and in relation to flood risk, and so do not justify a decision otherwise than in accordance with the development plan. Indeed, having regard to the weight I have afforded to these material considerations, I find that the harm to the designated heritage asset would, of itself, be sufficient grounds to resist this proposal.

Conclusion

51. Accordingly, I conclude that the appeal is dismissed.

JP Sargent

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

M Brady	Engineer
M Cook	Barrister instructed by the appellant
S Desai	Planning consultant
O Gomez	Appellant
S Maiden-Brooks	Flood risk consultant
S Westwater	Architect

FOR THE LOCAL PLANNING AUTHORITY:

M Ergen	Team manager with the Council
J Meacher	Senior Planning Officer with the Council
J Rotrand	Deputy Area Manager East Area with the Council

INTERESTED PARTIES:

V Bott	Local resident
J Cage	Consultant Engineer representing some local residents
M J Campion	Local resident
A Gostling	Planning consultant representing some local residents
M Krantz	Lawyer representing some local residents
L Manville	Local resident
P Nessling	Local resident
R Smith	Local resident
P Way	Local resident
D Williams	Local resident
J Wisdom	Local resident

DOCUMENTS SUBMITTED AFTER THE HEARING OPENED

BY THE APPELLANT:

1. Undated Unilateral Undertaking (received 17 July 2023)
2. Drawings entitled '*Existing contour plan*' and '*Proposed contour plan*' (Drawing numbers 2033-PP-zz-00-dr-a-SK-0001 Rev 01 & 2033-PP-zz-00-dr-a-SK-0002 Rev 01) (received 19 July 2023)
3. Drawing entitled '*Schematic surface water drainage section*' (Drawing number HC-2685-502) (dated 25 July 2023)
4. Unilateral Undertaking dated 4 August 2023.
5. Email to the Planning Inspectorate concerning the suggested conditions and with amended contour plans (Drawing numbers 2033-PP-zz-00-dr-a-SK-0002 Rev 02 & 2033-PP-zz-00-dr-a-SK-0003 Rev 01) (received 8 August 2023)

BY THE LOCAL PLANNING AUTHORITY:

1. Application plans of the refurbishment of No 17

BY INTERESTED PARTIES:

1. Representations from Rob Smith (dated 17 July 2023)
2. '*Outline response to Herrington Rebuttal Statement concerning flood risk and drainage and related documents*' with 19 Appendices by Gunnercooke LLP submitted by HGH Consulting (received 17 July 2023)
3. '*Create Consulting Engineers Response to Herrington Rebuttal Statement Flood Risk & Drainage*' submitted by Jonathan Cage (received 17 July 2023)
4. Email from Sham Marcellin-Fowler to Cllr Donatella (dated 23 June 2020) submitted by Mr Krantz
5. June Extract plan from *West London SFRA* submitted by Mr Krantz