



Appeal Decision

Hearing Held on 10 December 2024

Site visit made on 11 December 2024

by R Merrett Bsc(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 07 January 2025

Appeal Ref: APP/T5150/C/24/3349329

85 & 85a Draycott Avenue, Harrow HA3 0DD

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
- The appeal is made by Jadavji Patel against an enforcement notice issued by the Council of the London Borough of Brent.
- The enforcement notice, numbered E/21/0538, was issued on 24 June 2024.
- The breach of planning control as alleged in the notice is Without planning permission, the material change of use of the premises from two flats to short-term letting accommodation. AND/OR Without planning permission, the material change of use of the premises from two flats to two Houses in Multiple Occupation (HMO). ("the unauthorised change of use").
- The requirements of the notice are STEP1 Cease the use of the premises as short-term letting accommodation AND/OR Cease the use of the premises as Houses in Multiple Occupation (HMO); STEP3 Remove all internal partitions, items, materials and debris associated with the unauthorised change of use, including the removal of all kitchens, en-suite bathrooms/shower rooms and toilets, except those shown in the attached plans; STEP4 Restore the internal configuration to the original layout before the unauthorised change of use took place, as shown in the attached plans.
- The period for compliance with the requirements is 6 months.
- The appeal is proceeding on the grounds set out in section 174(2)(a), (c), (d) and (f) of the Town and Country Planning Act 1990 as amended. Since an appeal has been brought on ground (a), an application for planning permission is deemed to have been made under section 177(5) of the Act.

Summary of Decision: The appeal is dismissed and the enforcement notice is upheld with corrections in the terms set out below in the Formal Decision.

Preliminary Matters

1. There is agreement between the parties that at the time the notice was issued, the alleged short-term letting use, and not the alleged House in Multiple Occupation (HMO) use, was being operated in both properties. The appellant described an arrangement whereby guests may rent rooms in the properties, initially for between 3 and 28 nights but with the possibility of extending the booking. I am satisfied that I am able to correct the notice accordingly, without causing injustice to either party. Consequently, only the alleged short-term letting use, and not an HMO use, may form the basis of the deemed application for planning permission pursuant to the ground (a) appeal.
2. In the initial 'start letter', issued by the Planning Inspectorate, the grounds on which the appeal was made were recorded as including ground (b), namely that the alleged breach of planning control had not occurred as a matter of fact. However, at the Hearing, the appellant confirmed that there was no appeal made on ground (b). I have no reason to take a contrary view, and therefore make no assessment of the appeal against that ground.

3. The appeal grounds include (c) and (d) which are 'legal' grounds of the appeal. For each ground the onus is on the appellant to prove their case. The standard of proof is the balance of probability.

The appeal on ground (c)

4. The ground (c) appeal is that there has not been a breach of planning control. In order to conclude on this ground, it is necessary to set out the planning history of the appeal site, in the context of any relevant changes in planning law, so as to establish whether the alleged use is lawful because it does not constitute development by being materially different from any lawful use of the properties.
5. No 85 Draycott Avenue originally comprised a detached dwelling. Planning permission was granted by the Council in December 2005 to sub-divide the property into two self-contained maisonettes (Nos 85 and 85a)¹. No 85 was shown as a two-bedroom dwelling; and no 85a was to have three bedrooms. The appellant says that the approved layout plans for the two properties were not implemented and instead the design 'evolved' such that by the time the conversion works were completed in December 2006, each property was provided with seven bedrooms. They say that the implemented layout has not been altered since then. The Council disputes the appellant's account, and considers the evidence indicates the current layout has resulted from progressive alterations, identified on previous plans.
6. In my judgment there is a lack of compelling evidence to contradict the appellant's claim that the approved layout plans were not implemented and that when the properties were first let on a continuous basis, from May and July 2007 respectively, they were partitioned in accordance with the drawing specified below². However, because on the balance of probability, the scheme was not implemented in accordance with approved plans, and what was implemented deviated substantially from those plans, I find that the December 2005 planning permission would have lapsed and cannot therefore be relied on. It follows, in accordance with s55(3) of the 1990 Act, that the sub-division of the dwelling into two separate units would have involved a material change in the use of the building which was unauthorised and therefore unlawful.
7. It is uncontentious that the respective sub-divided properties were let to various groups of up to six students between 2007 and 2015. Supporting evidence is submitted by the appellant in the form of tenancy agreements, and the Council do not seek to challenge the continuity of this arrangement.
8. During 2007 the Council investigated an enforcement complaint in relation to the use of the properties. This resulted in an acknowledgement that the respective units each appeared to be let out to no more than 6 persons and that consequently a HMO use was not taking place and that the use had not altered³. The use was accepted as falling within Class C3, as it was previously defined, of the Use Classes Order⁴, which included up to 6 persons living together as a single household.

¹ Planning permission ref: 05/2065, dated 1 December 2005.

² CON/DA/FITOUT/P2-02 Rev E.

³ Council's letter dated 12 November 2007.

⁴ the Town and Country Planning (Use Classes) Order 1987.

9. At the Hearing the Council confirmed it accepted the aforementioned arrangement of students living together as a single household would have comprised the lawful use of the properties in 2007. To reiterate, I do not accept such use of the properties would have been lawful at that time, for the reasons set out in paragraph 6 above.
10. On 6 April 2010, an amendment to the Use Classes Order introduced a definition of small-scale houses in multiple occupation into the planning system. It effectively split the old Class C3 (dwellinghouses) class into two separate classes – Class C3 (dwellinghouses) and Class C4 (houses in multiple occupation).
11. The result of this was that development previously falling under Class C3 was reclassified so that it fell into either the new C3 or C4 Classes. This reclassification did not amount to a change of use under planning legislation (it is not classified as development), so no consequences arose from the reclassification, in itself, in terms of the need to seek planning permission.
12. However, for the purposes of Class C4, an HMO has the same meaning as in s254 of the Housing Act 2004, in that the living accommodation is occupied by persons who do not form a single household, recognising that the definition of a single household therein excludes unrelated persons living together. I have not been provided with any evidence to persuade me that Nos 85 and 85a Draycott Avenue would not therefore have been reclassified as HMOs for up to six residents (Use Class C4).
13. S171B(2) of the 1990 Act provides that where there has been a breach of planning control, consisting in the change of use of any building to use as a single dwellinghouse, no enforcement action may be taken after a period of four years⁵ beginning with the date of the breach. This would include the sub-division of a single dwelling into two residential units, as in the present case. Therefore, drawing the above considerations together, I am satisfied that the use of the appeal properties for letting to groups of up to 6 unrelated tenants, would have gained lawfulness due to the passage of time by July 2011.
14. Article 3(1) of the Use Classes Order, as amended, provides that where a building or other land is used for a purpose of any class specified in the Schedule, the use of that building or that other land for any other purpose of the same class shall not be taken to involve development of the land. This means that a change of use within a single use class does not involve development and therefore does not require planning permission. The upshot is that once the units became lawful within Class C4, planning permission would not have been required for continued HMO use, so long as the number of tenants did not, in each case, exceed six.
15. From August 2015 it appears that the number of tenants living at both properties increased. The appellant's evidence for No 85 includes a tenancy agreement for seven tenants between August 2015 and August 2017. With regard to No 85a there were tenancy agreements between September 2015 and August 2018 with separate management companies and the appellant's evidence, as confirmed at the Hearing, despite lacking details of occupancy, indicates the property was let for up to nine residents over this period⁶. No evidence is provided to suggest that in practice the number of occupants of this property continued not to exceed six.

⁵ For breaches that occurred prior to 25 April 2024.

⁶ Response to Council's Planning Contravention Notice dated 3 January 2023.

16. Where a HMO accommodates more than six residents it falls outside any specified class of use within the Use Classes Order. In such circumstances it would be regarded as a '*sui generis*' use. The question is, therefore, in the context of paragraph 15 above, whether this change would have been material requiring planning permission.
17. I concur with the view that an increase in the number of unrelated tenants living at the properties would be likely to have given rise to greater overall variation in movement patterns, and that there would be fewer linked trips than if the dwellings were occupied, say, by a single family. Furthermore, it is likely there would have been an increase in the number of visitors associated with the unrelated identities of the occupiers.
18. Accordingly, this would have given rise to increased comings and goings to and from the properties, including possible audible conversations between people. The appeal site is within a predominantly residential suburban location, such that nearby residents are likely to have been aware of and potentially sensitive to such changes.
19. In addition, an increase in tenant numbers would result in less space per occupant being available, and would potentially result in the provision of inadequate internal amenity space overall.
20. I therefore consider any increase in the number of tenants that would have taken the units outside the C4 Use Class, would have been likely to have had a noticeable effect on the surrounding area and the amenities of the occupiers. Accordingly I find, on the balance of probability, both Nos 85 and 85a were the subject of a material change of use of land around August 2015. This is not to say whether or not the use would have been acceptable on its planning merits, only that it would have amounted to development requiring planning permission. Because no such planning permissions were sought, on the balance of probability the use of the respective properties became unlawful once again in 2015.
21. Whilst it has been suggested, as part of the appellant's statement of case, that more than six residents at a time have been living at the properties continuously since 2006, this proposition is not supported by evidence. The appellant confirmed at the Hearing that three letters dated 21 May 2013 were in relation to potential replacement, as opposed to additional, occupiers.
22. The appellant has confirmed that since October 2017 (at the earliest), in the case of No 85 and since August 2018, in the case of No 85a, the properties have been subject to a short-term letting arrangement, based on online bookings for up to 28 nights. They refer to occupiers staying at the units as guests, rather than tenants, and as visitors, rather than residents. They describe guests as having diverse backgrounds which might include hospital visitors; persons working short term contracts; refugees; homeless persons; victims of violence; tourists who are unable to afford more expensive hotels and persons who dislike living alone. The appellant also confirmed at the Hearing that it was possible for an occupier in one of the units to use the communal facilities such as lounge or kitchen in the other unit, and vice versa.
23. The maximum number of occupiers may have remained consistent with the previous larger HMO uses. However, it seems to me that the diverse background and potentially far more frequent turnover of guests, and transient pattern of

occupation at the properties, would potentially lead to a reduced sense of social cohesion, both with one another and in terms of having a stake in the wider residential community, than would otherwise have been the case with residents subject to longer term tenancies. It seems to me that this could be detrimental to an individual guest's sense of responsibility to and consideration for other residents, which may harm living conditions.

24. I am also mindful of the implications of the Deregulation Act 2015, whereby the cumulative use of any residential premises in Greater London for temporary sleeping accommodation, for greater than ninety nights in the same calendar year, would, by definition, amount to a material change of use.
25. I therefore consider the change to short-term letting of the properties would have resulted in a further material change in their use which would have required planning permission. Again, no such planning permission has been sought and the uses are therefore unlawful. I conclude the alleged unauthorised use represents a breach of planning control. It follows that the appeal on ground (c) must fail.

The appeal on ground (d)

26. The ground of appeal is that at the date the notice was issued, no enforcement action could be taken. In order to succeed on this ground, in accordance with s171B(3) of the 1990 Act, it would be necessary for the appellant to demonstrate that the short term letting use(s) had continued for a period of 10 years or more prior to the date the notice was issued, that being 24 June 2024, so as to be immune from enforcement.
27. The onus rests with the appellant to demonstrate, on the balance of probability, that the use(s) has been continuous over this period, with the exception of any non-material breaks in occupation.
28. I have determined in the pre-ceding paragraphs that a material change of use to short-term letting occurred at the appeal properties in 2017 and 2018 respectively. The appeal on ground (d) must therefore fail.
29. For the avoidance of doubt, it is also evident from my findings on the ground (c) appeal that the larger HMO uses, which effectively operated prior to the short-term letting use(s) and from August 2015 could also not gain lawfulness through the passage of time.

The appeal on ground (a)

Main Issues

30. The appeal on ground (a) is that planning permission should be granted. The main issues are i) the effect of the development on the vitality of town centres; ii) the effect of the development on the living conditions of the occupiers of the properties in terms of the amount of internal space available; iii) the effect of the development on neighbouring residents, having particular regard to disturbance from comings and goings and management of the properties; iv) the effect of the development on the supply of family housing and v) the arrangements for cycle parking.

Reasons

Town Centre vitality

31. The Council sets out that in keeping with national policy it supports the development of hotels and other visitor accommodation, subject to a sequential test, whereby sites within town centre areas of Wembley and Kilburn should be prioritised. It states that visitor spend can have potential spin-off benefits for complementary uses such as bars and restaurants in town centres. The National Planning Policy Framework (the Framework) defines main town centre uses as including tourism development such as hotels. The appeal site is not situated within a town centre location.
32. This raises the question as to whether the short-term letting use targeted by the notice can be properly characterised as tourist accommodation. Having regard to the diverse backgrounds of the users of the accommodation, as set out above and which is not disputed by the Council, it is clear that the units in this case are not only used for tourism related purposes. Indeed, I am not persuaded it can be said the units are even predominantly used for tourism purposes, or make any meaningful impact on the tourism related economy. Furthermore, from the evidence, it seems possible that guests at the properties may decide to remain in occupation for substantial periods; and for some that it will be their main residence.
33. I have set out above how I consider the short-term letting use may be distinguished from an HMO use. Notwithstanding this, I do not consider the character of the short-term letting use in this case to be particularly dependant on or supportive of the typical sorts of leisure, entertainment and recreation uses associated with the town centre. Accordingly, I conclude that the development would not be harmful to town centre vitality and would not be in conflict with Policies DMP1 and BE9 of Brent's Local Plan 2022 (BLP) or with the Framework insofar as they seek to prioritise visitor accommodation in town centre locations.

Living Conditions of Occupiers

34. The Council's Houses in Multiple Occupation Supplementary Planning Document 2022 (HMO SPD) sets out minimum standards of amenity expected for new HMOs. It recognises that bedrooms in HMOs often comprise the sole private living space for occupants and are therefore more likely to be occupied for greater periods than bedrooms for households in self-contained dwellings.
35. I have set out above that for some, the short-term letting accommodation is likely to provide their main residence. Either way, it is likely that occupiers may seek to spend considerable periods of time in their rooms. It therefore seems reasonable that the HMO SPD amenity space standards should be equally applicable to the short term letting accommodation in this case. Furthermore, because I have determined the use to be unlawful, it is reasonable that the standards are applied retrospectively.
36. With regard to bedrooms the HMO SPD states that the London Plan net internal floorspace standards are considered the minimum acceptable to gain planning permission. For a single person room this is 7.5 square metres. The standards also require sufficient defensible space for rear bedrooms, with windows facing directly onto communal outdoor amenity space and that bedrooms are not accessed from communal space such as kitchens. A minimum standard of 5

square metres of internal communal amenity space should be provided per resident.

37. From my visit it was apparent that one bedroom in each of the appeal properties, at first floor level, fell significantly short of meeting the minimum floorspace standards; that the rear ground floor bedroom in No 85 lacked the requisite defensible space, thus impinging on the privacy of occupiers, and was also accessed from a communal area in contravention of the standards. It also appeared to me that the kitchen / lounge areas in relation to both units were deficient in space against the internal communal amenity space standards, when having regard to the potential number of occupiers.
38. Even if it can be said that some occupants may have relatively few possessions, I am not persuaded that this will typically be the case, especially as I have determined that for some occupiers it is likely to be their main residence. I conclude that the design of the appeal properties, because of inadequate standards of internal space, result in harm to the living conditions of occupiers⁷. Accordingly, there is conflict with Policies DMP1 and BH7 of the BLP, Policies D6 and H9 of the London Plan 2021 (LP) and with the Framework insofar as they seek to safeguard such conditions. The fact that the accommodation may previously have been acceptable for licensing purposes does not alter my conclusion, given that this constitutes a separate and independent regime of control.
39. The various habitable rooms were all served by windows and I have no reason to conclude they would be deprived of sufficient natural light or ventilation.

Living Conditions of Neighbours

40. The occupation of the properties by guests independently of one another, is likely to give rise to a wide variation in movement patterns. Furthermore, it appears that for some, the appeal site could be their main residence. A significant number of visitors to the properties, associated with the unrelated identities of the occupiers, cannot therefore be ruled out.
41. The pattern of occupation could potentially give rise to a large number of comings and goings to and from the properties, and potentially at times when neighbouring occupiers would reasonably seek to enjoy the peace and quiet of their homes.
42. However, the semi-detached construction of the two appeal properties allows for greater separation from much of the accommodation in the neighbouring dwellings than may otherwise have been the case. I have not been informed of any complaints from neighbouring or nearby residents, with regard to noise disturbance arising from general comings and goings, over the lengthy period of time the appeal site has been used for HMO or short-term letting uses. Furthermore, the appellant proposes to introduce a management plan for the premises. I agree that the wording of such a plan could be effective in terms of deterring disorderly behaviour and ensuring the maintenance of the properties, including the storage of waste.
43. Drawing these considerations together, on balance, I conclude the development would not be harmful to the living conditions of neighbours. I do not find conflict with Policies DMP1 and BH7 of the BLP, with the LP or with the Framework insofar

⁷ My conclusion here would remain unaltered, even if the size of the loft bedrooms, which were not measured during my visit, were found to comply with the relevant standards.

as they collectively seek to avoid development having unacceptable impacts in terms of noise and other forms of disturbance.

Family Housing

44. The appellant firstly seeks to argue there has been no loss of family housing in this case, as the appeal properties are both HMOs. However, this point cannot be relied on because for the reason set out later in my decision, any lawful HMO use at the properties no longer exists.
45. The BLP sets out that the majority of housing need in Brent is in relation to family dwellings of 3 bedrooms or more. Policy BH10 of the BLP is concerned with resisting housing loss, and the provision and safeguarding of the stock of family housing is recognised in the BLP as a Brent priority. The Council granted planning permission in December 2005 to sub-divide No 85 (a family sized house) into two maisonettes. Because one of the units included three bedrooms, the Council says that this would not have resulted in a net loss of family accommodation. It says the present short-term letting use and the previous HMO uses would have been at odds with this policy priority. I concur that the short-term letting use of the appeal properties fails to safeguard family accommodation and would conflict with the objectives of Policy BH10.
46. The appellant refers to the Council's evidence demonstrating that housing delivery in Brent between 2021 – 2023 significantly exceeded the planned requirement; and that in addition it delivered 144% of its requirement under the Housing Delivery test. It therefore considers the loss of a family dwelling at the appeal site to be immaterial. However, this performance outcome does not specifically indicate that targets for the delivery of family sized housing are being met, and I concur with the Council that it does not equate to the need for such housing being overcome.
47. The appellant has referred to Policy BH7 of the BLP which sets out that accommodation with shared facilities will be supported subject to compliance with certain criteria. These include that the location should have good access to public transport and other amenities (normally within 400 metres). Whilst the appeal site is outside this distance threshold, it was apparent from my visit that it is within a ten minute walk of a variety of shops (including a large supermarket) as well as separate overground and underground rail stations. In my judgment the site therefore has an acceptable standard of access to amenities.
48. In terms of other criteria, acknowledging that the units would provide some occupiers with their main residence, HMOs are recognised within Council policy as playing an important role, allowing for flexibility and affordability. Furthermore, the Council accept that it would not lead to an over-concentration of such accommodation in the area; also that a condition could be imposed requiring that satisfactory management arrangements are operated. It is also undisputed that a need exists for additional serviced visitor accommodation within the Borough.
49. Notwithstanding this, I have set out above that the accommodation would fail to provide acceptable quality standards for its occupants. For this reason the proposed development would fail to comply with all of the specified criteria as required. I am also mindful that the HMO SPD states that where the quality of accommodation is considered not to be sufficient, it is more likely to tilt the balance in favour of retaining the premises as a family dwelling.

50. Drawing the above considerations together, on balance I find the development to be at odds with the Council's strategy for prioritising the safeguarding of its stock of family dwellings.

Cycle Parking

51. The Council object to the development on the grounds of a lack of sufficient, secure on-site cycle parking provision, which therefore fails to encourage the use of sustainable modes of travel. However, at the Hearing the Council accepted that it would be possible for sufficient cycle parking to be secured on the site, at the rear of the properties, via the imposition of a suitable planning condition.
52. Subject to the imposition of a condition I therefore concur that the proposed use would comply with Policies BT1 of the BLP and T5 of the LP insofar as they seek to promote sustainable travel choice, and in particular cycling.

Planning Balance and Conclusion on ground (a)

53. I have found conflict with the Council's development plan in terms of the loss of family housing, even though the premises would appear not to have been used as such for several years, and in terms of the standard of accommodation provided. Set against this is the contribution the units make towards a requirement for visitor accommodation, and to flexible and affordable living accommodation, in a location which has reasonable accessibility to local amenities, which would no doubt provide a degree of support to the local economy. However, for the reasons set out earlier in my decision, this does not outweigh the harm.
54. I have not found harm in terms of town centre vitality, the living conditions of neighbouring residents or the provision of cycle parking. However, this lack of harm is neutral in the planning balance.
55. Therefore, on balance, drawing the above considerations together, the factors in support of the use do not, in my view, outweigh the policy conflict I have identified. I therefore conclude that it would not be appropriate to grant planning permission for the short term letting use. The ground (a) appeal fails.
56. I recognise that the requirements of the notice would interfere with rights under Article 8: The Right to Respect for Private and Family Life and for the Home of the Human Rights Act 1998. However these are qualified rights and Article 8(2) provides that interference may be justified where it is in the interests of, amongst other things, the economic well-being of the country, which has been held to include the protection of the environment and upholding planning policies. In this case I have found the proposed development to be in conflict with planning policies and would not outweigh the wider public interest. Accordingly, the degree of interference that would be caused would be insufficient to give rise to a violation of rights under Article 8 and would not be disproportionate.

The appeal on ground (f)

57. The ground of appeal is that the steps required by the notice to be taken exceed what is necessary to achieve the purpose. The purposes of an enforcement notice are set out in s173 of the 1990 Act and are to remedy the breach of planning control (s173(4)(a)) or to remedy injury to amenity (s173(4)(b)). The 1990 Act sets out that the breach may be remedied by making the development comply with the terms of any planning permission granted in respect of the land, by discontinuing

any use of the land or by restoring the land to its condition before the breach took place.

58. With regard to the unauthorised development, the objectives of the notice are to discontinue its use and to restore the maisonette configuration, prior to the unauthorised use taking place. It follows that the purpose of the notice is to remedy the breach of planning control.
59. However, given that the purpose of the notice is to remedy the breach of planning control, and I have found the maisonette use was never implemented, this can only therefore be achieved by the discontinuance of the unauthorised use. To require that much does not, therefore, exceed what is necessary.
60. There is a right under s57(4) of the 1990 Act, when an enforcement notice has been issued, to revert to the last use, provided it was a lawful use. That right does not extend to a past lawful use when there has been one or more intervening unlawful uses between it and the use alleged. I have identified such an intervening unlawful use, by way of the material change of use of the properties in 2015.
61. Accordingly, there can be no automatic reversion, in relation to either property, to the six person HMO use, as this can no longer be regarded as the lawful use of the properties. Nos 85 and 85a therefore have a 'nil use'. However, despite this position, I am unable to conclude that the introduction of the maisonette layouts, when such layouts were not implemented to begin with, would be a proportionate step. I shall therefore correct the notice to remove the relevant steps, and the ground (f) appeal succeeds to this limited extent.

Conclusion

62. For the reasons given above I conclude that the overall appeal should not succeed. I shall uphold the enforcement notice, with corrections, and refuse to grant planning permission on the application deemed to have been made under section 177(5) of the 1990 Act as amended.
63. I have determined that the appeal properties have a 'nil use'. It will therefore be necessary for the appellant to consider how they propose to use the properties going forward, and whether planning permission will need to be sought from the Council for that use.

Formal Decision

64. It is directed that the enforcement notice is corrected by:

the deletion of the wording in Schedule 2, describing the alleged breach of planning control, in its entirety, and the substitution of the following wording instead:

“Without planning permission, the material change of use of the premises to short-term letting accommodation.”; and

the deletion of the wording in Schedule 4, describing the requirements in various steps to remedy the breach of planning control, in its entirety, and the substitution of the following wording instead:

“Cease the use of the premises as short-term letting accommodation.”

65. Subject to these corrections the appeal is dismissed, the enforcement notice is upheld, and planning permission is refused on the application deemed to have been made under section 177(5) of the 1990 Act as amended.

R Merrett

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Thaddaeus Jackson-Browne	Planning Consultant
Jadavji Patel	Appellant

FOR THE LOCAL PLANNING AUTHORITY:

Nigel Wicks	Planning Consultant
Tim Rolt	Planning Enforcement Manager
Anna Mascheroni	Planning Enforcement Officer

DOCUMENTS SUBMITTED AT THE HEARING:

- 1) Extracts from Greater London Council (General Powers) Act 1973 and Greater London Council (General Powers) Act 1983.
- 2) Draft List of suggested conditions if minded to allow the appeal.