The Planning Inspectorate

Appeal Decisions

by D Fleming BA (Hons) MRTPI

an Inspector appointed by the Secretary of State

Decision date: 09 November 2022

Appeal A, Ref: APP/B5480/C/21/3268806
140 Benhurst Avenue, Hornchurch, ESSEX RM12 4QW

- 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 Mr D Rafiq against an enforcement notice issued by the Council of the London Borough of Havering.
- The enforcement notice was issued on 15 January 2021.
- The breach of planning control as alleged in the notice is without planning permission, the material change of use of the land from a single dwelling house to two self-contained flats.
- The requirements of the notice are:
  (i) Cease using the property as two self-contained flats;
  (ii) Remove all the kitchen and cooking facilities except for one kitchen and all bathroom and bathroom facilities except for one bathroom; and
  (iii) Remove all electricity metres/fuse boxes from the premises except for one which serves the whole premises; and
  (iv) Remove all internal dividing walls, framework and doors from the ground floor hallway and above the original balustrade to the staircase which facilitates the use as two self-contained flats; and
  (v) All materials and debris associated with steps I ii iii and iv above shall be totally removed from the site.
- The period for compliance with the requirements is three months.
- The appeal is proceeding on the grounds set out in section 174(2)(a) and (d) of the Town and Country Planning Act 1990 as amended.

Summary Decision: The appeal is dismissed and the enforcement notice is upheld.

Appeal B, Ref: APP/B5480/X/21/3264848
140 Benhurst Avenue, Hornchurch, ESSEX RM12 4QW

- The appeal is made under section 195 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991 against a refusal to grant a certificate of lawful use or development (LDC).
- The appeal is made by Mr M Danish Rafiq against the decision of the Council of the London Borough of Havering.
- The application Ref E0041.20, dated 6 July 2020, was refused by notice dated 8 September 2020.
- The application was made under section 191(1)(a) of the Town and Country Planning Act 1990 as amended.
- The use for which a certificate of lawful use or development is sought is described as "Lawful development of the existing 4 bedroom house converted to two flats for more than four consecutive years".

Summary Decision: The appeal is dismissed.

Preliminary Matter

1. It has not been necessary to carry out a site visit as a decision can be reached on the papers. All the information needed is included with the application and appeal documents.

2. The Procedural Guide - Certificate of lawful use or development appeals – England, dated 14 June 2022, states at paragraph 7.2.11.5 that "A site visit won't be needed for every appeal. It is for the Inspector to decide whether to conduct one". This advice is replicated in the Procedural Guide - Enforcement Notice Appeals England, updated 21 April 2022, at paragraph 8.2.11.5.

Background and Procedural Matter

3. The appeal concerns a two storey, mid-terrace property, which has a single storey rear extension. The submitted plans and photographs show that the ground floor flat (Flat A) occupied by the appellant is laid out with an en suite bedroom overlooking the front of the building. This abuts a kitchen opening onto the lounge within the rear extension. There is an additional bathroom to the rear of the stairs. The first floor flat (Flat B) is tenanted and comprises a bedroom overlooking the front of the building which abuts an open plan lounge/kitchen overlooking the rear. There is also a bathroom and a room labelled "dining/store".

4. When the Council viewed the building on 11 December 2020, they found that the ground floor bedroom overlooking the front of the property was being used as a lounge but with some bedding in bags. The kitchen remained in the middle of the ground floor layout but the extension was being used as a bedroom. The first floor layout largely accorded with the plans except there was a single bed in the "dining/store". This flat did not appear to be occupied.

5. Prior to the most recent lawful development certificate (LDC) application (Appeal B), the appellant submitted an earlier LDC for the same development. This was refused by the Council in May 2020. After the most recent LDC application was refused in September 2020 the Council issued the enforcement notice in January 2021. Evidence for the earlier LDC application differs from the later LDC application for example with regard to the utility bills for Flat B. However, it appears that all the appellant's evidence has now been submitted for the ground (d) appeal.

6. When the notice was issued, the Council relied on the policies contained in The London Plan published in 2016 and the London Borough of Havering Local Development Framework Core Strategy and Development Control Policies Development Plan Document, adopted 2008. These have now been replaced by The London Plan published 2021[1] (TLP) and The London Borough of Havering Local Plan 2016-2031, adopted November 2021 (HLP). The views of the parties were sought on these changes and I have taken any comments made into account in determining Appeal A.

Appeal A: The ground (d) appeal and Appeal B: The LDC appeal

7. The appeal on ground (d) is that at the date when the notice was issued, no enforcement action could be taken. The burden of proof in an appeal on this ground lies with the appellant. As such, the appellant needs to show, on the

[1] The London Plan – The Spatial Development Strategy for Greater London, March 2021

balance of probabilities, that the use of the building as two self-contained flats began more than four years before the notice was issued. In addition, that the use continued such that at any time during the four year period the Council could have taken enforcement action against the use. The relevant date for Appeal A is therefore 15 January 2017.

8. The purpose of an LDC is to enable owners and others to ascertain whether specific uses, operations or other activities are or would be lawful. Lawfulness is equated with immunity from enforcement action. The issue of a certificate depends entirely on factual evidence about the history and planning status of the building or land in question and the interpretation of any relevant planning law or judicial authority.

9. As with the ground (d) appeal, the burden of proof regarding decisive matters of fact rests on the appellant. The appellant must therefore adduce enough relevant, clear and unambiguous evidence to demonstrate the truth of that assertion. The relevant test of the evidence is the same as for the ground (d) appeal.

10. Rather unusually, the appellant has asserted that the use of the building as two flats is lawful but that he would like lawfulness to be considered from December 2019. A residential use is only considered to be lawful if it is immune from enforcement action and it began more than four years before the date of the LDC application. This would mean the relevant date for Appeal B is 6 July 2016, not December 2019. As the December 2019 date would mean there was less than four years use, and the appeal would be dismissed, I shall proceed on the basis that this must have been a misunderstanding by the appellant. In particular, it contradicts what is stated in the statutory declaration and the affidavit.

11. In this case each self-contained flat is classed as a dwelling house for the purposes of ground (d) and the LDC. Establishing the start of the four year period involves a two stage process.

12. The first stage is to look at the physical works and ascertain the date that the flats were capable of providing viable facilities for living, rather than the date when all the works were completed. The second stage is to establish when the use of each flat actually commenced and whether there was a continuous residential use thereafter with viable facilities for living, to the extent that the Council could have taken enforcement action against the use of any flat at any time.

13. On the matter of continuous use, there is a difference between an established dwelling house or flat where an occupier does not have to be continuously or even regularly present in order for it to remain in use as a dwelling house or flat and where there is no established use. In the latter case, the use has to be affirmatively established at the start of the four years.

14. It is possible for the change of use of each flat to have commenced prior to actual occupation, provided that the premises were capable of being so used. It is a matter of fact and degree as to when the change of use occurs, and it is incorrect for a decision maker to simply regard the commencement of actual residential use after the conversion as giving rise to the change of use. It is not enough to conclude that because the premises were not in fact actually

used, there had not been a change of use. On the other hand, it is more difficult to show a change of use just by physical works and nothing more.

Reasons

The appellant's case for both appeals

15. The appellant states he purchased the property on 30 January 2015 and that the use as two flats began on 3 December 2015 following conversion works carried out in November 2015. He has submitted the following information:

    - Construction contract dated 6 May 2015;
    - Receipts for materials purchased from Selco dated 2015;
    - Photographs of Flat B from November 2015 until July 2020;
    - Utility bills from 2014 to 2018;
    - Letter from estate agent who advised on a proposed sale of the property as two flats in 2017;
    - Statutory declaration from the appellant;
    - Tenancy agreements for Flat B; and
    - Affidavit from the appellant.

The Council's case

16. The Council question much of the appellant's evidence and state that Planning Enforcement Officers visited the site on 21 October 2015 as part of an enforcement investigation. The appellant and his architect were also present during this visit. Photographs were taken of the internal layout and sketches were made to ascertain the use of the property, although these have not been submitted by the Council. Their conclusion at the time was that the property was being used as a house in multiple occupation (HMO) with one shared kitchen and shared bathrooms.

17. The Council also confirm that they have no building control records in relation to the property and that Council Tax records indicate it is in use as a single dwelling.

Assessment

18. Having regard to the first stage of the assessment, the appellant relies upon the construction contract and the Selco receipts. The contract is dated 6 May 2015 and the project is described as "Ground floor to be converted into two flats, front room as a separate flat and rear two rooms including bathroom as a separate flat. First floor already converted into a separate flat but minor internal work need to be done". In the specification for the first floor flat there is mention of "Installation of kitchen plinth with LED lights" and "Painting of existing cupboards" which suggests that there was an existing kitchen. However, this is disputed by the Council, given what was seen at their October 2015 site visit.

19. It is not clear whether this contract was acted upon as the ground floor is laid out as one flat, not two. It appears to be a quote for works rather than a

contract and although it states the first floor has already been converted into a flat, there is no date from the appellant as to when this occurred. There are no details from the appellant to show how the building was laid out when he purchased it, such as sales particulars, and no photographs from that time. He simply states on the LDC application form that the use as two flats began on 3 December 2015.

20. Within the statutory declaration the appellant states he converted the property into 2 x 1 bedroom flats in November 2015. Additional information is provided in a later affidavit in which he states that the property was rented as two "units" prior to November 2015 and used as an HMO "but in an informal and ad hoc manner". There is no further information to explain how these two different uses took place and what is meant by the term "ad hoc". There is also no evidence from for example bank statements to show payment for the works following completion, especially as the construction contract is dated much earlier.

21. I turn now to the Selco invoices. The earliest is dated 29 December 2014, which is before the appellant purchased the property, and appears to be an order for kitchen units and a combi boiler. There is nothing to link the invoice to the appellant or the site whereas the second invoice dated 18 February 2015 states the appeal site as the delivery address. It is not known what was bought as the receipt obscures the items listed. The invoice dated 12 May 2015 lists several items, most of which are obscured again, except for the combi boiler, but the delivery address is the appeal site.

22. The appellant states he bought some items before the contract was awarded. As the last receipt is dated 28 July 2015, it would appear he bought all items well in advance of construction works taking place in November. It is not known where they were kept, especially as some of them would have been quite bulky such as the kitchen units, but the appellant may have been prepared to live with the inconvenience. An alternative explanation is that the appellant refitted the existing kitchen after he purchased the property. Several of the invoices have no link to the appeal site such as those dated in June 2015. Whilst the appellant makes a link by explaining that AA Studio, listed on some of the invoices, was the agent for the appellant in 2014 and 2015, they equally could have been receiving items for other customers, not necessarily the appellant.

23. There may be a perfectly reasonable explanation with regard to the invoices, but it is not before me. The Council suggest that ordering goods for one property and having them delivered to another would not happen in the real world but I disagree. It is not unknown for builders to take delivery of kitchen units and appliances prior to preparation works in the old kitchen being complete. However, in this case the appellant states that the address on the invoices is the business address of his architect not a builder. Overall, I afford the construction contact and the invoices limited weight when it comes to establishing a date for the creation of each of the flats.

24. Turning now to the use of the two flats, there are the following tenancy agreements for Flat B:

Occupier	Start date	End date
Tenant 1	5 Dec 2015	4 May 2016
Tenant 1	15 Jun 2016	14 Dec 2016
Tenants 2 & 3	15 Dec 2016	14 Dec 2017
Tenants 2 & 3	5 Jan 2018	4 Jan 2019
Tenant 4	10 Jan 2019	9 Jun 2019
Tenant 4	1 Jul 2019	30 Jun 2020
Tenant 4	1 Jul 2020	31 Dec 2020

25. Tenancy agreements are contracts and on their own they are not evidence of use; they only show intent and that a particular person agreed on a certain date to rent a property. The early tenancy agreements are not witnessed with a handwritten signature by a person who is not the landlord. The tenancy agreements are also not accompanied by any proof of identity of the tenant. The only verification of Tenant 1 is from a utility bill which was issued 10 months *before* (my emphasis) the signing of their tenancy agreement and for Tenant 2 the verification is from a utility bill issued in their name in January 2016, which was 11 months *before* they signed their tenancy agreement. There is no verification for the other tenant.

26. The tenancy agreements show some breaks in occupation. In respect of each tenant's occupation, it is likely that their first tenancy agreement was rolled over until their second agreement could be signed. The gap between Tenants 2 & 3 and Tenant 4 was less than a week, which is insignificant. Sometimes flats are decorated between a changeover of tenants and in terms of a small flat, such as this, it is unlikely that this would take more than a week. However, the appellant offers no explanation for the interruption in the use.

27. The Council found Flat B to be vacant when they visited on 11 December 2020. There was no bedding or clothing in the bedroom and the kitchen bin, cupboards and fridge were all empty. It may be that Tenant 4 moved out just before their tenancy agreement ended or they may have surrendered their agreement earlier. In either case there is no explanation from the appellant as to when this occurred.

28. With regard to Flat A, the appellant states in both his statutory declaration and affidavit that he has occupied Flat A continuously from when it was constructed. The Council disputes this by reference to their records of the appellant's telephone calls made to Council tax personnel. These notes record calls made on 27 January 2017, 19 December 2017 and 15 January 2018 in which the appellant states the property has been occupied by a single person since 30 January 2015. In response, the appellant states it is not an offence to convert a property into two flats without planning permission and to register them with Council tax would bring that to the attention of the Local Planning Authority. I find some appellants do seek to conceal a material change of use but where that occurs, and positive deception is proven, it has been held in the Courts that appellants would not benefit from any claimed period of immunity.

29. With regard to the utility bills, these are as follows:

Bill type	Date	Addressee
Electricity	11 Sept 2015	Appellant, Flat A
Electricity	14 Jul 2016	Appellant, Flat A
Water	26 Sept 2016	Appellant. Flat A
Electricity	15 Jan 2018	Appellant, Flat A
Water	4 Feb 2015	Tenant 1, Flat B
Water	8 Jan 2016	Tenant 2, Flat B

30. The bills are addressed to the occupiers of Flats A and B but in some cases, this is before the flats are constructed. The appellant explains this by reference to the previous "ad hoc" arrangement of the property and that lawful use as two flats is only claimed from December 2015. As I have no detailed explanation as to what the ad hoc arrangement was, I afford little weight to the first bill dated 11 September 2015.

31. The water bill dated January 2016 is addressed to Tenant 2 but according to the tenancy agreement, Tenant 2 did not occupy the flat until December 2016. The appellant explains this discrepancy by saying that it is not unusual for utility bills to be out of step with tenancy agreements especially when tenants move on after six months. It can also be the case that the tenancy agreement is signed by one occupier but the bills are in their partner's name. Whilst a bill might be issued in a previous tenant's name after that tenant has moved on, the dates on these bills are for periods before the tenant has officially occupied the flat. I find that this is not tenable. Furthermore, the water bill is dated January 2016 but it refers to the arrangement for paying the bill by direct debit. The bank details are set out but, rather oddly, the date of the first collection is specified as 18 February 2018, some two years later. The discrepancy between the dates is not explained by the appellant.

32. The Council submit that they examined the veracity of the bills and have been advised by the water authority that their records show the property is registered as being one unit. In addition, bills have not been issued by them for two flats. The Council also contacted the electricity supplier who confirmed that there is only one electricity meter at the property. The Council submit a photograph taken by their Enforcement Officer dated 11 December 2020 which shows one gas meter and one electric meter. The appellant, other than criticising the Council's suggestion that the bills have been tampered with, makes no Final Comments on these points.

33. Turning now to the photographs, these appear to all be dated and the details of the jpeg files are provided for each photograph to also show when they were taken. Three of the images are of Flat A, namely the bathroom, kitchen and lounge and these appear to correlate with the appellant's plan for this flat. The remaining images are a series of photographs of the bedroom, kitchen/lounge and bathroom of Flat B, taken from November 2015 to July 2020.

34. The photographs clearly show that there is a kitchen on the first floor very similar in age and appearance to the kitchen on the ground floor. The

photographs also appear to show that the kitchen in Flat B has existed since November 2015. However, there is a discrepancy in the images in that the 2015 kitchen units each appear to be affixed with an A5 size sticker at a jaunty angle. These are not present in the 2016 images but they re-appear in the 2017 images, all in the same place and at the same angle.

35. As it is not possible to see the wording on the stickers, it is not known whether these are manufacturer's labels or are decorative features applied by the tenant. In either case, it seems unlikely, given their precise positioning, that they were removed in 2016 (during Tenant 1's occupation) and then re-applied in 2017 (during Tenant 2's occupation) in exactly the same places. An alternative explanation is that the dates of the photographs contain an error, which casts doubt on the accuracy of the evidence.

36. The Selco receipts appear to show that two boilers were purchased by the appellant. A boiler is visible in the kitchen of Flat B but none is visible for Flat A. It may be that it is not captured by the camera angle or that it is in the unphotographed bedroom but given that usually a boiler flue needs to be placed so that it expels fumes through an outside wall, this discounts the bathroom and it is not seen in the lounge. There is no further information from the appellant which would explain this.

37. Finally, there is the letter from the estate agent. Most of it appears to repeat the information that has been passed on by the appellant. The only first-hand knowledge relates to the appellant's proposed sale of the flats in or around January 2017. The letter is not accompanied by a copy of those sales details, which may have been deleted given the time that has passed, and it does not mention that the estate agent visited the property. It does however contribute to my understanding of the history of the site but in itself it carries limited weight.

38. The Council's records show that the appellant made a request for pre-application advice on 7 December 2017. He stated that he was proposing to change the use of the dwelling into two flats. This information highlights an inconsistency in the appellant's case but this is explained away by him. He states the pre-application advice was to see if a future application to retain the use as two flats would be acceptable. If that was the case, then this could also amount to positive deception, as I have already discussed.

Overall Summary

39. Having regard to the totality of the evidence, it has not been demonstrated when each flat was created. I am also not persuaded that the use of either flat began more than four years before the issue of the enforcement notice or the date of the LDC application and continued without material interruption for a period of four years thereafter. This is because the appellant's evidence alone is not sufficiently precise and unambiguous to justify the grant of a certificate. The appellant's own evidence does not need to be corroborated by independent evidence to be accepted but the appellant's own evidence appears to be inconsistent, with several unexplained discrepancies.

Conclusion

40. The appeal on ground (d) and the appeal against the refusal to grant an LDC therefore fail.

Appeal A: the ground (a) appeal and the deemed planning application

Mian Issue

41. The main issue is the effect of the development on the living conditions of existing and future occupiers and neighbours, having regard to the standard of accommodation, noise and disturbance.

Reasons

42. The parties disagree over the size of each flat with the Council stating that Flat A is 43sqm and Flat B is 38.75sqm and the appellant stating that each flat is larger with Flat A being 48.66sqm and Flat B being 40.59sqm. Table 3.1 accompanying TLP Policy D6 sets out the minimum space standards for new dwellings[2]. These depend on the number of bedrooms and number of bed spaces. The appellant has not submitted any photographs of the bedroom in Flat A but if the flat is occupied by one person with one bedroom, then the size of it meets the minimum standard, which is 39sqm. However, notwithstanding that the burden of proof rests with the appellant, he has not responded to the Council's observations at their site visit that there were two persons occupying the flat, in which case I find that the size of Flat A does not meet the standard, which is 50sqm.

43. With regard to Flat B, the minimum standard is either 50sqm or 61sqm depending on whether there are one or two bedrooms. The tenancy agreements and utility bills show that two people have occupied the flat and the appellant has not responded to the Council's observation at their site visit that there was a second bedroom. So, whether there are two bed spaces or three, I find that the size of Flat B does not meet minimum standards.

44. Failure to meet the standards matters as these are minimum standards which have been created so as to provide comfortable and functional layouts that are fit for purpose. The occupation of each flat by more than one person results in a cramped layout, for example, in Flat B there is no separate lounge and the photographs show a small sofa and coffee table have been placed in the kitchen. In Flat A, if the extension is used as a second bedroom, then this is only accessible and separated from the kitchen by a pair of obscure glazed doors, resulting in minimal privacy for the occupier.

45. In addition, Policy 9 of the HLP, which deals with the subdivision of residential properties to self-contained homes, only supports such proposals where the original dwelling has no less than 120sqm of original floor space. That does not appear to be the case at the appeal site. Furthermore, the resulting layout does not include a family unit of three or more bedrooms, which is also required by the policy. The supporting text explains this is necessary so as to enable the retention of smaller dwellings for householders on moderate incomes.

46. Having regard to neighbouring occupiers, the appeal site is a mid-terrace property. The layout of No 138 and the appeal site means that they are "halls adjoining" nevertheless, concerns have been raised that the use of the first floor as a self-contained flat has resulted in unacceptable levels of noise and disturbance. Third parties have experienced this, through the party wall between their third bedroom and Flat B's either "dining room/store" or second

[2] New dwelling in this context includes new build, conversions and change of use.

bedroom. For the occupiers of No 142, Flat B's kitchen abuts one of their bedrooms, which is likely to result in noise and disturbance.

47. The appellant submits that in any residential unit bedrooms will abut primary habitable rooms. However, the difference in the appeal situation is that the appeal property is occupied by more than one household. Unlike single households, where control can be exercised over the use of the property, separate households operate in accordance with their own timetables which may conflict with other occupiers and neighbours. Policies 7 and 9 of the HLP seek to protect the amenity of existing and future residents from unacceptable levels of noise, vibration and disturbance and seek to avoid having living areas that abut the bedrooms of adjoining properties.

48. I turn now to the provision of private outdoor space. The appellant submits that the rear garden is available for Flat A and Flat B tenants can make use of a nearby park. On the basis that the rear extension is used as a lounge, this would be acceptable for Flat A. However, the appellant has not responded to the Council's finding at their site visit that the rear extension is used as an additional bedroom. In which case access to the garden would not be acceptable, as it would intrude on the privacy of the occupier of the bedroom. This would conflict with the intention of Policy D6 of TLP for practical outside space and the requirement of Policy 7 of the HLP for flatted schemes to be provided with balconies.

49. A nearby park is useful for recreation for the occupiers of Flat B but this overlooks the requirement for private outdoor space. Policy D6 states where there are no higher local standards in the borough development plan documents, a minimum of 5sqm of private outdoor space should be provided for one to two person dwellings. Such space is necessary, for example, to dry washing and to provide an easily accessible sitting out area. Its absence adds to my findings on the unsuitability of the property being used as two flats.

50. The appellant submits two further points, namely the development supports the optimisation of housing, especially as it is near public transport and refers to TLP Policy H2 Small Sites. However, as the Council have identified, I find that this has to be balanced against the equally pressing need for family homes, hence the adoption of a threshold of 120sqm for the subdivision of houses. I therefore find no conflict between TLP Policy H10 Housing Size Mix and HLP Policy 9 as referred to by the Council and Policy H2.

51. Third parties have raised other concerns about the effect of the development. With regard to the turnover of tenants and looking out from the first floor rear room of Flat B, this could occur if the whole property was tenanted even if the room was used a bedroom. With regard to cooking smells, there is no substantiated evidence that these emanate from the first floor kitchen as opposed to the ground floor kitchen and the appellant states that both kitchens are fitted with extractor fans. The appellant also states that Havering Building Control has carried out a building regulation fire assessment, which was satisfactory, and that sound insulation meets building regulation requirements. In addition, the property has space for two off street parking spaces and is well located for public transport. The effect of the use on property values is not a material planning consideration.

52. The Council also seek to rely on several other policies (HLP Policies 23, 26, 27 and 35[3] and TLP Policies D1, D5, T5, T6 and T6.1[4]) the equivalent of which, if there were any, are not referred to in the reasons for issuing the notice. I find that as the Council have not explained why they have been submitted, they merit little weight in respect of this decision.

53. In conclusion, I find that the development harms the living conditions of existing and future occupiers and neighbours, having regard to the standard of accommodation, noise and disturbance. This does not accord with TLP Policies GG4, D4, D6 and HLP Policies 7 and 9. The appeal on ground (a) therefore fails.

Conclusions

Appeal A

54. For the reasons given above, I conclude that the appeal should not succeed. I shall uphold the enforcement notice and refuse to grant planning permission on the application deemed to have been made under section 177(5) of the 1990 Act as amended.

Appeal B

55. For the reasons given above, I conclude that the Council's refusal to grant a certificate of lawful use or development in respect of "Lawful development of the existing 4 bedroom house converted to two flats for more than four consecutive years" was well-founded and that the appeal should fail. I will exercise accordingly the powers transferred to me in section 195(3) of the 1990 Act as amended.

Formal Decisions

Appeal A

56. 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.

Appeal B

57. The appeal is dismissed.

D Fleming

INSPECTOR

[3] Transport Connections, Urban Design, Landscaping and Waste Management
[4] London's Form, Character and Capacity for Growth; Inclusive Design; Cycling; Car parking and residential Car Parking