

STATEMENT OF CASE

APPLICANT: L&Q

PROPOSED DEVELOPMENT:

Redevelopment of the site to provide a mixed use scheme of 441 residential units (Class C3) including 50% affordable housing with ancillary facilities, flexible uses (within Classes A1, A2, A3 and B1) and a nursery (Class D1). Comprising buildings of 12, 13, 16, 17 and 18 storeys in height, with associated cycle parking, car parking, playspace, landscaping and public realm improvements.

Site: Citroen Site, Capital Interchange Way, Brentford, TW8 0EX

Planning Inspectorate Reference: APP/G6100/V/19/3226914

Date: 26 July 2019

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1. Introduction

- 1.1. This statement of case is authored on behalf of L&Q in respect of the Secretary of State's decision to call-in planning application 01508/A/P6 (GLA reference GLA/4279/02/NR) for the mixed use redevelopment of the Citroen Site, Brentford, TW8 0EX (hereinafter referred to as 'the Site').
- 1.2. This statement of case provides details of the site and its surroundings, relevant planning history, the planning framework, the main considerations for the call-in, and relevant evidential documents.
- 1.3. Comprehensive proofs of evidence will be provided at a later date in accordance with the agreed bespoke programme.
- 1.4. This statement of case outlines that the application accords with the development plan and how the direction of travel of emerging policy and guidance provides further support to the application. Any harm resulting from the proposals is limited and less than substantial whilst the public benefits include much-needed housing in the Great West Corridor, the provision of 50% affordable housing, the delivery of a high quality building design and public realm in an area identified for significant growth and regeneration both at a local and regional level. When weighing up the development plan, national policy and guidance and the material planning considerations, the statement of case concludes that planning permission clearly should be granted.

Background

- 1.5. A planning application for full planning permission for the mixed-use redevelopment of the Site was submitted to the London Borough of Hounslow in November 2017. The description of development was:

“Redevelopment of the site to provide a mixed use scheme of 427 residential units (Class C3) including 40% affordable housing with ancillary facilities, flexible uses (within Classes A1, A2, A3 and B1) and a nursery (Class D1). Comprising buildings of 12, 13, 15, 16 and 18 storeys in height, with associated cycle and car parking, playspace, landscaping and public realm improvements.”
- 1.6. The London Borough of Hounslow resolved to refuse permission for this application on 16 February 2018. On 26 February 2018, having considered a report on the case, the Mayor of London notified Hounslow that he would act as the Local Planning Authority for the purposes of determining the planning application under article 7 of the Mayor of London Order and the powers conferred by Section 2A of the 1990 Town and Country Planning Act.
- 1.7. The application was amended in May 2018, and subject to re-consultation. The revised description of development is

“Redevelopment of the site to provide a mixed use scheme of 441 residential units (Class C3) including 50% affordable housing with ancillary facilities, flexible uses (within Classes A1, A2, A3 and B1) and a nursery (Class D1). Comprising

buildings of 12, 13, 16, 17 and 18 storeys in height, with associated cycle parking, car parking, playspace, landscaping and public realm improvements.”

- 1.8. Following site visits and a hearing on 20 July 2018, the Mayor of London resolved to grant planning permission on the 22 August 2018.
- 1.9. The Secretary of State issued a holding direction over the scheme on 20 November 2018. The planning application was subsequently called-in on 15 April 2019.

2. Site and Surroundings

- 2.1. The site extends to approximately 0.96 hectares in area and is located in the Brentford ward of the London Borough of Hounslow (LBH). It is located on the northern side of Chiswick High Road (South Circular) close to the junction with the Great West Road/elevated M4 motorway. Capital Interchange Way curves around the site on its north-western and south-western boundary.
- 2.2. The site currently comprises the Citroen car dealership and associated surface level parking area for the sale and storage of vehicles. The application site is under-utilised, comprising of three one-storey buildings and significant hardstanding.
- 2.3. The site is located within close proximity to bus stops served by five routes. Kew Bridge national rail station is located approximately 200m from the site and is served by South West train services.
- 2.4. The nearest London Underground station is Gunnersbury, located approximately 800m from the site. This is served by the District Line, as well as London Overground services to Richmond and Stratford. The site has an average Public Transport Accessibility Level (PTAL) of 3 (with a small element within PTAL 4). The site is a sustainable location for high density development.
- 2.5. The site is bounded by a Volkswagen car dealership to the north east. To the south east the site is bounded by the Fountain Leisure Centre, owned by Hounslow Council. Kew House School, a co-educational independent senior school is located to the west of the site.
- 2.6. There is substantial development activity taking place in the immediate vicinity, reflecting the areas inclusion in the “Great West Corridor” which is subject to regeneration aspirations for both the Council and the Greater London Authority. The details of these applications are set out in Section 3 (Planning History) of this Statement of Case. The role that the application site is able to play in improved connectivity and townscape together with these other developments will be explored in the evidence.
- 2.7. The site is not located within a conservation area and does not contain any listed buildings. The site is not within a Strategic Viewing Corridor.
- 2.8. In the wider area, Gunnersbury Park located to the north of the site is a Grade II* registered landscape and contains the Grade II* Listed Mansions and lake with 18th Century Grade II* Listed Temple.
- 2.9. To the south of the site, Kew Bridge Conservation Area contains the Grade II Listed Kew Bridge, Kew Bridge Station and several other listed buildings, including the Grade I Listed Pumping Station. To the east and south-east of the site, there are the Strand on the Green, Thorney Hedge and Wellesley Road conservation areas. Beyond the borough boundary, south of the River Thames lies Kew Gardens World Heritage Site.

- 2.10. The site is located within Flood Zone 1 and thus is identified as having less than 1 in 1,000 annual probability of river or sea flooding. The Site is not subject to any international, European or national ecological designations.
- 2.11. The applicant's evidence will draw upon the many locational characteristics of the site, the physical features of the site, the long-held regeneration aspirations for the area together with wider heritage considerations beyond the immediate environs.

3. Planning History

- 3.1. The site itself has an unremarkable planning history. However, there have been a number of recent applications submitted for sites in the immediate proximity of the Site, which have either been determined or are currently pending consideration. These include several applications for tall buildings.
- 3.2. The applicant will refer to relevant planning applications in its evidence, including but not limited to the following:

Neighbouring Sites

Wheatstone House, 650 Chiswick High Road

- 3.3. Wheatstone House abuts the southern eastern corner boundary of the site, immediately next to Fountain Leisure centre.
- 3.4. A full planning application for the demolition of the existing building and redevelopment to provide commercial floorspace (464m²) at ground floor (Class A1-A4) and/or B1a) with 95 apartments (Class C3) above was approved at appeal on 16 March 2015 (reference P/2013/2757).
- 3.5. The proposed building is 9 storeys in height (28.63m). Following planning permission being granted the site was acquired by L&Q, the applicant in this matter. Wheatstone House is currently under construction. It is due for completion in early 2020.

Brentford Football Stadium, Land at Lionel Road

- 3.6. Brentford Football club is located immediately opposite the site on the other side of Capital Interchange Way.
- 3.7. A hybrid planning application for Brentford Football Club was approved on 12 June 2014 (reference P/2013/1811). This was for full planning permission for the erection of a stadium with ancillary accommodation (D2 Use Class) and associated infrastructure, parking and landscaping; and outline planning permission for the erection of associated enabling development, comprising up to 910 residential units (C3 Use Class), up to 1,200m² retail/other floorspace (A1, A2, A3, A4, A5, D1 and D2 Use Classes), a hotel of up to 160 bedrooms (C1 use class), circulation areas, parking, landscaping and amenity areas.
- 3.8. Following this, a reserved matters application in relation to a two-storey car park was approved on 18 December 2015 (reference P/2015/3247). A further reserved matters application for access, appearance, landscaping, layout and scale in relation to Central Eastern, Capital Court, and Central Southern sites comprising 648 residential units, A Class and D Class floorspace was approved on 21 January 2016 (reference P/2015/3392).

Minor Material Amendments (P/2017/3891) and Reserved Matters (P/2017/3892).

- 3.9. A s73 planning application was validated on 12 September 2017. The proposals amended the design of the approved scheme. This included re-configuring the layout of the residential buildings and reducing the capacity of the stadium from 20,000 to 17,250.
- 3.10. The changes to the residential buildings involved changes to mass and orientation of the blocks. However, the scheme remains within the height parameters of the original permission. A reserved matters application was submitted in reference to the central southern and central eastern sites comprising 487 units, 1,019m² community facilities and 1,043sqm non-residential uses (A1-A5, D1 and D2 use). Both the s73 and reserved matters applications were approved on 1 February 2018.
- 3.11. The development is under construction, and evidence will reference the proposal in relation to regeneration and heritage issues relevant to the applicant's Site.

1-4 Capital Interchange Way

- 3.12. 1-4 Capital Interchange Way is located immediately north of the site.

2016 Planning Application (P/2016/5238).

- 3.13. A full planning application for the demolition of existing warehouse/storage buildings and advertisement stanchion, and redevelopment to provide a bus depot (sui generis), up to 550 residential units (Use Class C3), offices (Use Class B1), cafe (Use Class A3) and pod buildings was submitted on 16 November 2016 (reference P/2016/5244). At the same time an application for advertisement consent was also submitted (reference P/2016/5238). The proposal included a two-storey podium building and three 18, 19 and 20 storey buildings above. The proposal did not include any affordable housing. The planning application was refused on 15 December 2017.

2018 Planning Application (P/2018/4117)

- 3.14. A full planning application was submitted in 2018 (P/2018/4117). The proposed development comprises of 420 residential units (Use Class C3) and flexible retail and commercial floorspace (A classes and B1) in buildings up to 16 storeys in height. The application is pending determination.
- 3.15. The applicant will refer to the above proposals as part of the evidence submitted.

“Chiswick Curve” Site

‘The Citadel’ (P/2002/0568)

- 3.16. Planning permission was granted in September 2002 (reference P/2002/0568) for a thirteen storey office building with basement car parking. The implementation of the permission has been confirmed by Hounslow Council. The height of the implemented permission is 59m.

‘Chiswick Curve’ (P/2015/5555 and P/2015/5560)

- 3.17. A planning application for the redevelopment of the site to provide a mixed use building of one part ground plus 31 storeys and one part ground plus 24 storeys, comprising 327 residential units (Use Class C3), office (Use Class B1) and retail/restaurant uses (Use Class A1-A3) was submitted in December 2015 (reference P/2015/5555). An application for advertisement consent was also submitted (reference P/2015/5560) for the erection of three internally illuminated fascia signs to the proposed building. The maximum height of the building was 120m AOD.
- 3.18. Both planning applications were refused at a planning committee meeting on 12 January 2017. The decision notices were issued on 9 February 2017. An appeal against the Council's decisions on the full application and advertisement consent were lodged on 17 May 2017 and 8 August 2017 (references APP/F5540/Z/17/3173208 and APP/F5540/W/17/31809620).
- 3.19. The Planning Inspectorate recommended that both appeals be allowed on the 10 December 2018. However, on the 19 July 2019, the Secretary of State dismissed the appeals, disagreeing with the Inspector's recommendations.
- 3.20. The applicant will refer to the previous permissions on the land for a tall building, and the implemented "Citadel" permission amongst other matters.
- 3.21. The applicant will also reference the findings of the Secretary of State and Planning Inspector, including the agreed position that the proposal constituted "*Less than Substantial Harm*".
- 3.22. The applicant will also draw attention to affordable housing in the context of these sites. These include:

Site	Affordable Contribution % (Habitable Rooms)
London Borough of Hounslow Policy	40%*
Applicant Site (Citroen)	50%
Wheatstone House	28%**
Brentford Football Stadium	0%
1-4 Capital Interchange Way (2018)	41%

*Hounslow Local Plan (2015) Policies SC2 and SC3

**Quantum and tenure of affordable housing not available for Wheatstone House by habitable room calculation. Numbers presented are by unit.

Other Relevant Planning History

Albany Riverside (P/2017/3372)

- 3.23. Hounslow Council resolved to grant planning permission for the demolition of the existing office and arts centre for 193 homes and ancillary ground floor retail/café. The application was considered alongside a related application for the former Brentford police station (P/2017/3371) which sought to provide a new arts centre alongside 105 homes. Both schemes had a maximum height of 7 storeys.

- 3.24. The Albany Riverside application was subsequently called-in by the Secretary of State at the same time as the Citroen scheme (15 April 2019) and it was envisaged that the two applications may initially be co-joined. However, it was decided by the Secretary of State on 16 May 2019 that a co-joined inquiry for both applications was not warranted.
- 3.25. Based on the original call-in referring to both applications, the applicant's evidence will reference the Albany Riverside scheme.
- 3.26. In addition to the above applications in the immediate vicinity of the Site, the applicant will also make reference to other tall buildings in the Great West Corridor that are visible from key views. These include Vantage West (62m AOD), the BSI Building (71m AOD), the Haverfield Estate Towers (72m AOD) and the Kew Eye (102m AOD).
- 3.27. The applicant is also aware that planning application submissions may be made for other sites in the vicinity of the site. These may be referenced in the applicant's evidence.

4. Planning Policy Framework

- 4.1. The applicant will evidence the relevant planning policy framework consisting of, but not limited to, the following:

National Planning Policy & Guidance

- 4.2. The Revised National Planning Policy Framework (NPPF) was published on 24 July 2018 and updated on 19 February 2019. It is accompanied by the National Planning Practice Guidance (NPPG) which is online guidance that is periodically updated.
- 4.3. The Hounslow officer report was written whilst the 2012 NPPF was in force. A draft of the revised NPPF was the subject of consultation prior to the GLA Hearing. The decision to resolve approval of the application took place after publication of the Revised NPPF.
- 4.4. The applicant's evidence will demonstrate how National Planning Policy and Guidance weighs in favour of the application. This includes boosting the supply of housing and meeting affordable housing needs through a high quality design, whilst not causing more than very limited harm to heritage asset settings, which are outweighed by very considerable public benefits.

The Development Plan

- 4.5. The development plan comprises the 2016 London Plan (consolidated with alterations since 2011) and Hounslow Local Plan (2015). Of particular relevance are London Plan policies 3.3 (Increasing Housing Supply), 3.4 (Optimising Housing Potential), 3.5 (Quality & Design of Housing Developments), 3.7 (Large Residential Developments), 3.8 (Housing Choice), 3.9 (Mixed and Balanced Communities), 7.1 (Lifetime Neighbourhoods), 7.4, (Local Character) 7.6 (Architecture), 7.7 (Tall Buildings), 7.8 (Heritage Assets and Archaeology) 7.10 (World Heritage Sites) and Hounslow Local Plan policies SV1 (Great West Corridor Plan), SC1(Housing Growth), SC2 (Maximising the Provision of Affordable Housing); SC4 (Housing size and type), SC4 (Scale & Density of New Housing Development), Ensuring suitable internal and external space, CC1 (Context and Character), CC2 Urban Design and Architecture), CC3 (Tall Buildings), CC4 (Heritage) amongst others.
- 4.6. The site is not subject to any site-specific allocations in the adopted local plan for development. It is located within a wider Archaeological Priority Area. Both the adopted local plan and the adopted London Plan reference the Great West Corridor as a potential Opportunity Area, within which the site lies. The Great West Corridor is also identified as a London Development Centre in the development plan.
- 4.7. The applicant will provide evidence that elements of the development plan are being superseded with the emergence of the Great West Corridor Opportunity Area gathering weight, the adoption of the new National Planning Policy Framework, and new evidence available on housing delivery and housing targets. Nonetheless, the application can be determined against the adopted development plan, and that planning policies provide sufficient basis for approval.

Emerging Policies

The Draft London Plan (July 2019)

- 4.8. The draft London Plan has been published for consultation and has been subject to an Examination in Public, which concluded on 24 May 2019. The Panel Report is timetabled for September 2019. Whilst the weight that can currently be attached to the draft London Plan is relatively limited, depending on the contents of the report, the weight that may be attached to the London Plan may be greater by the time of the Inquiry.

Draft Great West Corridor Local Plan Review (2017 & 2019)

- 4.9. The draft Great West Corridor Review (Preferred Options Consultation) was the subject of consultation between 23 October and 10 December 2017. The proposed Regulation 19 pre-submission draft is anticipated to be the subject of consultation in July 2019. The proof of evidence may refer to the current draft or the Regulation 19 consultation dependent on its availability at the time of the inquiry.
- 4.10. In these documents, the Great West Corridor Opportunity Area is identified as a location for significant growth for 7,500 new homes and 14,000 new jobs. Evidence will be provided on the site's role in achieving these targets, both in absolute terms and the wider regeneration benefits that will prevail for the proposal.

The Draft Brentford East SPD (2017)

- 4.11. The draft Brentford East Supplementary Planning Document (SPD) was released for consultation on the 23 October 2017. The 6-week consultation period concluded on the 10 December 2017.
- 4.12. Workshops with "Key Stakeholders" identified by the Council took place on a revised draft Brentford East SPD in July 2018 and included the Citroen site. A new version of the SPD was anticipated to be released in early 2019.
- 4.13. If a new Brentford East SPD is not released ahead of the inquiry, the applicant's evidence will consider the weight that should be attributable to the first draft SPD in the decision-making process and the soundness of its content.
- 4.14. Emerging policies were cited by The London Borough of Hounslow in their original reasons for refusal, and similarly by the Mayor of London and the Greater London Authority in reasons for approval. The applicant's evidence will therefore demonstrate how the application performs favourably against these forthcoming policies and the evidence bases that underpin them.

Other London Plan Guidance Documents

- Affordable Housing and Viability SPG (August 2017);
- Housing SPG (March 2016);
- Crossrail Funding SPG (March 2016);
- Social Infrastructure SPG (May 2015);

- Accessible London: achieving an inclusive environment SPG (October 2014);
- The control of dust and emissions during construction and demolition SPG (July 2014);
- Shaping Neighbourhoods: character and context SPG (June 2014);
- Sustainable Design and Construction SPG (April 2014);
- Shaping Neighbourhoods: play and informal recreation SPG (September 2012);
- All London Green Grid SPG (March 2012);
- London World Heritage Sites (March 2012);
- Planning for Equality and Diversity in London (October 2007);
- Mayor's Environment Strategy (May 2018);
- Mayor's Housing Strategy (May 2018);
- Mayor's Transport Strategy (March 2018).

Other Hounslow Documents

- Air Quality SPD (2008);
 - Planning Obligations and Community Infrastructure Levy SPD (2015);
 - London Borough of Hounslow Urban Context and Character Study (2014).
- 4.15. The above documents may be referenced, alongside any other relevant policies, by the applicant as part of the overall case for development.

Mayoral Community Infrastructure Levy (CIL).

- 4.16. Mayoral CIL (MCIL1) at the rate of £35m² was applicable to development permitted in Hounslow between 1 April 2012 and 31 March 2019. Mayoral CIL (MCIL2) at the rate of £60m² is now applicable to developments permitted from 1 April 2019. Both charging schedules are subject to the relevant indexation from the time of adoption.

Hounslow Community Infrastructure Levy CIL

- 4.17. Hounslow Council's CIL came into effect on 24 July 2015. The site is located within "CIL Zone 1 (East)" A rate of £200m². for housing, £155m² for retail (where the additional gross retail space is over 280m²), a nil charge for healthcare, education and emergency service facilities, and a £20m² charge for all other uses is applicable. The charging schedule is subject to relevant indexation from the time of adoption.
- 4.18. Hounslow Council is currently consulting on a new Preliminary Draft Charging Schedule. The consultation will close on 14 August 2019 and the indicative timetable is that a new CIL charging schedule may be adopted in "Summer 2020".
- 4.19. The above CIL charging schedules will be referenced as part of an overall consideration of viability if such evidence is required during the Inquiry.
- 4.20. The applicant's evidence will explain how the proposal accords with the development plan, and that emerging policy provides additional detail and direction on how the proposal favourably performs in delivering the strategic aspirations of both the London Borough of Hounslow and the Greater London Authority.

5. The Proposal

- 5.1. The proposal consists of a mixed-use scheme which optimises the use of a brownfield site within the emergent Opportunity Area to bring forward a carefully considered set of benefits.
- 5.2. The residential component comprises of 441 homes. 50% of the residential will be affordable when measured on a habitable room basis.
- 5.3. In addition to residential, the development will also deliver a range of uses. This includes 588m² of uses within classes A1-A3 or B1. A nursery of 288m² is also provided.
- 5.4. The design employs a podium configuration with three principle buildings of differing heights above, delineated by 5 separate cores. Maximum building heights range from 12 storeys (53.18m AOD) to 18 storeys (72.08m AOD).
- 5.5. The ground floor of the development will create a positive interaction and enable good connectivity with surrounding streets and developments. The applicant has carefully considered opportunities to activate all sides of the ground floor, increasing permeability and legibility of the site and wider area. It will make a significant contribution to local regeneration, whilst improving the character and appearance of the local area and the way it functions.
- 5.6. A new public square forms part of the application. Its location, layout and configuration reflecting the aspirations of the local planning authority. Private amenity space is provided through a landscaped podium together with terraces, balconies and winter gardens.
- 5.7. The architecture is deliberately not expressive and deliberately does not seek to compete for visual attention with its neighbours or with the wider townscape, including its heritage assets. Materials and colour choices have been informed by a desire to reduce visual impact wherever possible.
- 5.8. Traditional brick facing is used as the predominant material. It is both robust, that is, hard wearing and durable over time, and attractive. The architecture relies on fine detailing and the overall proportions and composition. The scheme incorporates functional and aesthetic detailed design features for articulating the scheme in both immediate and long-distance views. Evidence will be provided on how the form of the building and its architecture has been carefully considered and is a highly positive feature of the development.
- 5.9. The applicant will demonstrate that the design approach does not lead to adverse impacts of overshadowing, noise, reflected glare, aviation, navigation or telecommunications interference.
- 5.10. The applicant will present evidence describing in detail the approach to design, showing that the proposals are of the highest architectural and urban design quality, as befitting the scale of the development and the importance of the site.

6. Core Planning Issues

- 6.1. Reasons for the Call-In of the planning application by the Secretary of State were not stated in the letter of 15 April 2019 and were not given upon further request either.
- 6.2. The applicant will therefore present evidence on the following Core Planning Issues previously considered by the London Borough of Hounslow and the Greater London Authority:
 - a. The Principle of Development
 - b. The Quality of Design
 - c. The Quality of Housing
 - d. The Quantum of Housing
 - e. The Quantum of Affordable Housing
 - f. The Effect on Heritage Assets
 - g. The Public Benefits of the Development
 - h. The Contribution to wider regeneration from Development
 - i. The Relationship to Climate Change
 - j. Transport
 - k. Planning Obligations & Planning Conditions

The Principle of Development

- 6.3. If not agreed in the Statement of Common Ground with the London Borough of Hounslow, the applicant will reaffirm the policy basis for a mixed-use development of the site in evidence.

The Quality of Design

- 6.4. Through evidence, the applicant will detail how the proposal represents the highest quality of urban and architectural design, which includes optimising the potential of the site.

The Quality of Housing

- 6.5. Evidence will demonstrate how the proposals satisfy all relevant planning standards, including, but not limited to, housing space standards, amenity space, separation distances, aspect and accessibility.

The Quantum of Housing

- 6.6. The applicant will illustrate through evidence, how the proposal will make a meaningful contribution to the existing and emerging housing targets with reference to London, Borough and Opportunity Area housing targets.

The Quantum of Affordable Housing

- 6.7. The proposals include 50% affordable homes measured by habitable room, apportioned 35% to London Affordable Rent and 65% to shared ownership. The applicant will demonstrate how these proposals, including the mix of affordable housing tenures and unit types, respond to Hounslow and GLA policy. Evidence will demonstrate how the proposals are aligned to an up to date assessment of local housing need.
- 6.8. The applicant will also detail the way in which the affordable housing proposals are enabled by the position of the applicant as a major Registered Provider with an objective to deliver affordable homes and own these in perpetuity. This will include demonstration of the extent to which the affordable housing delivery exceeds that which a more typical developer would provide. The draft section 106 agreement also includes a review mechanism to ensure the provision of affordable housing is maximised.
- 6.9. Evidence will be provided to show how the delivery of homes and affordable homes within Hounslow has persistently fallen below the targets set within the London Plan and the Hounslow Strategic Housing Market Assessment. This point, combined with the tenure / unit type mix, reinforces the public benefit of the proposal of 50% affordable homes and that this benefit should carry significant weight in the planning balance.

The Effect on Heritage Assets.

- 6.10. The applicant will demonstrate that any harm arising to designated assets is limited and less than substantial, and not in any case unacceptable when the scheme's benefits are taken as a whole. The applicant will present its case, with reference to relevant case law, policy and the conclusions of the London Borough of Hounslow, the Greater London Authority and others.
- 6.11. Furthermore, the applicant will also demonstrate that there is no substantial harm to any heritage asset and that less than substantial harm is unlikely to occur to the majority of the heritage assets referred to either, with only an assessment of any impacts to the setting of the Strand on the Green CA and Kew Gardens/the Orangery that are matters pertinent to the inquiry. There might be some very limited harm to the former, but on balance the degree of change involved to the latter would not lead to any harm. In any event, the proposals are of such quality that the public benefits that would be secured by the development would outweigh any identifiable harm to those designated heritage assets.

The public benefits from development

- 6.12. Evidence will be presented by the applicant describing the many public benefits arising from the proposal. This will include the role of the new public square located

at the confluence of forthcoming developments, the rejuvenation of a low intensity use site, and the realisation of wider aspirations in an area identified for significant development, amongst other benefits mentioned above, namely design, housing and affordable housing.

The relationship to Climate Change

- 6.13. It will be shown that the development has been positively designed to consider climate change. This will detail both the resilience of the scheme to climate change in terms of temperature changes and flood risk, but also the proposal's environmental performance and positive contribution to sustainable living.

Transport

- 6.14. The applicant will provide evidence of the schemes transport credentials and the appropriateness of the Site for high density development. This includes the encouragement of sustainable travel behaviours, through a car club, car club memberships and provision of cycle spaces and travel plan and low levels of car parking.

Planning Obligations & Planning Conditions

- 6.15. It has been possible through discussions to agree the heads of terms of the section 106 agreement and nearly all detailed wording in a draft section 106 agreement with both the Greater London Authority and the London Borough of Hounslow. It is anticipated that this will be completed and agreed prior to the inquiry, but in the unlikely event that this is not achieved, the applicant will provide a unilateral undertaking reflecting the agreed positions to date.
- 6.16. A set of draft planning conditions has also been agreed between the parties and is anticipated to be included in the statement of common ground.
- 6.17. The applicant will demonstrate that through appropriate conditions and obligations, the quality of the development will be enhanced, and any adverse impacts will be mitigated.

7. Conclusions

- 7.1. The application complies with national planning policy and guidance, and the development plan. The application also complies with emerging policy and guidance. These conclusions will be supported in the applicant's evidence.
- 7.2. The applicant's evidence will also make clear that the development will deliver a significant quantum of high-quality new homes for which there is a recognised need at a local, London and national level. The evidence will state that this contribution to the local housing stock should also be considered favourably, both in overall numbers and in the context of 50% of the development being affordable by habitable rooms.
- 7.3. Consideration will be given in the applicant's evidence to nearby planning applications in the vicinity of the site, and how the area has already changed and should change in response to the wider regeneration aspirations of the local authority and Greater London Authority.
- 7.4. The applicant's evidence will show that there is no credible basis for a judgement of substantial harm to be concluded in respect of any heritage asset. In addition to this, the public benefit case is clear and overwhelming, where a balancing test weighing the scheme against a less than substantial harm judgement may be required.
- 7.5. The applicant will therefore demonstrate that it is clear that the planning permission should be granted.