

STATEMENT OF COMMON GROUND

BETWEEN

L&Q

&

GREATER LONDON AUTHORITY (PLANNING AUTHORITY)

&

THE LONDON BOROUGH OF HOUNSLOW (RULE 6)

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: 22 November 2019

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1. Introduction

- 1.1. This statement of Common Ground relates to the call-in inquiry for the Citroen Site Capital Interchange Way. The 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.”

- 1.2. Prior to the Greater London Authority resolving to grant planning permission, the London Borough of Hounslow were the local planning authority determining the application. The London Borough of Hounslow are a Rule 6 party at the Inquiry.
- 1.3. This statement sets out the matters of agreement between the applicant and The Greater London Authority (GLA) and London Borough of Hounslow (LBH) in consideration of the application before the Secretary of State.

2. Agreed Planning Framework & Relevant Policies

- 2.1. It is agreed that the Development Plan comprises: The London Plan (2016) consolidated with alterations since 2011, the West London Waste Plan (2015) and the London Borough of Hounslow Local Plan (2015).
- 2.2. A new London Plan is scheduled to replace the 2016 London Plan. The Examination in Public concluded in May 2019. A copy of the official Panel Report is with the Mayor of London. It is anticipated that final London Plan will be published in February or March 2020. It is agreed that this is a material consideration.
- 2.3. The Hounslow Local Plan is currently the subject of a review. Consultation on the Regulation 19 draft closed on 24 September 2019. At the time of this Statement of Common Ground, the date of a possible Examination in Public is unknown but is expected in 2020. It is agreed that this is a material consideration.

National Planning Policy Framework (NPPF)

- 2.4. The current version of the National Planning Policy Framework was published in February 2019. The NPPF provides the Government's overarching policy on planning matters.

National Planning Practice Guidance (NPPG)

- 2.5. The National Planning Practice Guidance is an online resource to be read in conjunction with the NPPF. The NPPG is updated on an *ad-hoc* basis and not available in hard copy. It is also a material consideration.

London Plan

- 2.6. It is agreed that the following development plan policies are relevant to the determination of the planning application.
- Policy 1.1 Delivering the strategic vision and objectives for London;
 - **Policy 2.6 Outer London;**
 - Policy 2.7 Outer London: Economy;
 - Policy 2.8 Outer London: Transport;
 - Policy 2.13 Opportunity areas;
 - Policy 2.18 Green infrastructure;
 - Policy 3.1 Ensuring equal life chances for all;
 - Policy 3.2 Improving health and addressing health inequalities;
 - **Policy 3.3 Increasing housing supply;**
 - **Policy 3.4 Optimising housing potential;**
 - **Policy 3.5 Quality and design of housing developments;**
 - Policy 3.6 Children and young people's play and informal recreation facilities;
 - **Policy 3.8 Housing choice;**

- **Policy 3.9 Mixed and balanced communities;**
- **Policy 3.10 Definition of affordable housing;**
- **Policy 3.11 Affordable housing targets;**
- **Policy 3.12 Negotiating affordable housing;**
- **Policy 3.13 Affordable housing thresholds;**
- Policy 3.16 Protection and enhancement of social infrastructure;
- Policy 3.18 Education facilities;
- Policy 4.1 Developing London's economy;
- Policy 4.2 Offices;
- Policy 4.3 Mixed use development and offices;
- Policy 4.7 Retail and town centre development;
- Policy 4.8 Supporting a successful and diverse retail sector;
- Policy 4.9 Small shops;
- Policy 4.12 Improving opportunities for all;
- Policy 5.1 Climate change mitigation;
- Policy 5.2 Minimising carbon dioxide emissions;
- Policy 5.3 Sustainable design and construction;
- Policy 5.4A Electricity and gas supply;
- Policy 5.5 Decentralised energy networks;
- Policy 5.6 Decentralised energy in development proposals;
- Policy 5.7 Renewable energy;
- Policy 5.9 Overheating and cooling;
- Policy 5.10 Urban greening;
- Policy 5.11 Green roofs and development site environs;
- Policy 5.12 Flood risk management;
- Policy 5.13 Sustainable drainage;
- Policy 5.14 Water quality and wastewater infrastructure;
- Policy 5.15 Water use and supplies;
- Policy 5.17 Waste capacity;
- Policy 5.18 Construction, excavation and demolition waste;
- Policy 5.21 Contaminated land;
- Policy 6.1 Strategic approach;
- Policy 6.2 Providing public transport capacity and safeguarding land for transport;
- Policy 6.3 Assessing the effects of development on transport capacity;
- Policy 6.5 Funding Crossrail and other strategically important transport infrastructure;
- Policy 6.7 Better streets and surface transport;
- Policy 6.9 Cycling;
- Policy 6.10 Walking;
- Policy 6.12 Road network capacity;
- Policy 6.13 Parking;
- Policy 6.14 Freight;
- **Policy 7.1 Lifetime neighbourhoods;**
- **Policy 7.2 An inclusive environment;**
- **Policy 7.3 Designing out crime;**
- **Policy 7.4 Local character;**

- **Policy 7.5 Public realm;**
- **Policy 7.6 Architecture;**
- **Policy 7.7 Location and design of tall and large buildings;**
- **Policy 7.8 Heritage assets and archaeology;**
- **Policy 7.10 World Heritage Sites;**
- Policy 7.13 Safety, security and resilience to emergency;
- Policy 7.14 Improving air quality;
- Policy 7.15 Reducing noise and enhancing soundscapes;
- Policy 7.19 Biodiversity and access to nature;
- Policy 7.21 Trees and woodlands;
- **Policy 8.2 Planning obligations; and**
- Policy 8.3 Community Infrastructure Levy.

Hounslow Local Plan

2.7. It is agreed that the following policies are of relevance to the consideration of the application.

- **Policy CC1: Context and character**
- **Policy CC2: Urban design and architecture**
- **Policy CC3: Tall buildings**
- **Policy CC4: Heritage**
- Policy CC5: Advertisement panels, hoardings and structures
- Policy CI3: Health facilities and healthy places
- Policy EC1: Strategic transport connections
- Policy EC2: Developing a sustainable local transport network
- Policy ED1: Promoting employment growth and development
- Policy ED2: Maintaining the borough's employment land supply
- Policy ED3: Hotels and visitor accommodation
- Policy EQ1: Energy and carbon reduction
- Policy EQ2: Sustainable design and construction
- Policy EQ4: Air quality
- Policy EQ5: Noise
- Policy EQ7: Sustainable waste management
- Policy EQ8: Contamination
- Policy GB1: Green Belt and Metropolitan Open Land
- Policy GB7: Biodiversity
- Policy IMP1: Sustainable development
- Policy IMP3: Implementing and monitoring the Local Plan
- **Policy SC1: Housing growth**
- **Policy SC2: Maximising the provision of affordable housing**
- **Policy SC3: Meeting the need for a mix of housing size and type**
- **Policy SC4: Scale and density of new housing development**
- **Policy SC5: Ensuring suitable internal and external space**
- **Policy SV1: Great West Corridor**
- Policy TC3: Managing the growth of retail and other main town centre use
- Policy EC1: Strategic Transport Connections
- Policy EC2: Development a sustainable local transport network
- Policy IMP1: Sustainable Development

- Policy IMP3: Implementing and monitoring the Local Plan

Supplementary Planning Guidance

2.8. It is agreed that the following Supplementary Planning Guidance are relevant to the determination of the application.

- 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);

Other London Plan Guidance

2.9. It is agreed that the following Guidance and strategies referenced in the London Plan are also material considerations.

- 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).
- TfL Healthy Streets (February 2017)

Hounslow Supplementary Planning Guidance and Documents

2.10. It is agreed that the following Supplementary Planning Documents are material considerations relevant to the application.

- Air Quality SPD (2008)
- Planning Obligations and Community Infrastructure Levy SPD (2015)

Emerging Policies

2.11. Paragraph 48 of the NPPF sets out how much weight should be attributable to emerging policies in plans.

New London Plan

2.12. It is agreed that The New London Plan is at an advanced stage, having been considered at an Examination in Public and subject to a Panel report. The following emerging policies are relevant.

2.13. The Applicant and Greater London Authority agree that the substantial weight should be attached to the Draft London Plan. The London Borough of Hounslow believe that reasonable weight should be attached to the Draft London Plan though some policies are likely to be amended and where this is the case such draft policies will have less weight.

- Policy GG1 Building strong and inclusive communities;
- Policy GG2 Making best use of land;
- Policy GG3 Creating a healthy city;
- Policy GG4 Delivering the homes Londoners need;
- Policy GG5 Growing a good economy;
- Policy GG6 Increasing efficiency and resilience;
- Policy SD10 Strategic and local regeneration;
- Policy D1A London's form and characteristics;
- Policy D1B Optimising site capacity through the design-led approach;
- Policy D2 Delivering good design;
- Policy D3 Inclusive design;
- Policy D4 Housing quality and standards;
- Policy D5 Accessible housing;
- Policy D7 Public realm;
- Policy D8 Tall Buildings;
- Policy D10 Safety, security and resilience to emergency;
- Policy D11 Fire Safety;
- Policy D13 Noise;
- Policy H1 Increasing housing supply;
- Policy H5 Delivering affordable housing;
- Policy H6 Threshold approach to applications;
- Policy H7 Affordable housing tenure;
- Policy H12 Housing size mix;
- Policy S1 Developing London's social infrastructure;
- Policy S3 Education and childcare facilities;
- Policy S4 Play and informal recreation;
- Policy E1 Offices;
- Policy E2 Low-cost business space;
- Policy E4 Land for industry, logistics and services to support London's economic function;
- Policy E7 Industrial intensification, co-location and substitution;
- Policy E8 Sector growth opportunities and clusters;
- Policy E9 Retail, markets and hot food takeaways;
- Policy E11 Skills and opportunities for all;
- Policy HC1 Heritage conservation and growth;
- Policy HC3 Strategic and local views;
- Policy HC5 Supporting London's culture and creative industries;
- Policy G5 Urban greening;
- Policy G6 Biodiversity and access to nature;
- Policy G7 Trees and woodland;
- Policy SI1 Improving air quality;
- Policy SI2 Minimising greenhouse gas emissions;
- Policy SI3 Energy infrastructure;
- Policy SI4 Managing heat risk;

- Policy SI5 Water infrastructure;
- Policy SI7 Reducing waste and promoting a circular economy;
- Policy SI12 Flood Risk Management;
- Policy SI13 Sustainable drainage;
- Policy SI14 Waterways – strategic role;
- Policy T1 Strategic approach to transport;
- Policy T2 Healthy streets;
- Policy T3 Transport capacity, connectivity and safeguarding;
- Policy T4 Assessing and mitigating transport impacts;
- Policy T5 Cycling;
- Policy T6 Car parking;
- Policy T6.1 Residential parking;
- Policy T6.2 Office parking;
- Policy T6.3 Retail parking;
- Policy T6.5 Non-residential disabled persons parking;
- Policy T7 Freight and servicing;
- Policy T9 Funding transport through planning;
- Policy DF1 Delivery of the plan and planning obligations

- 2.14. It is agreed that the draft New London Plan should be given less weight than the development policies in the development, but should be afforded weight in the decision making process nonetheless.

Draft Local Plan Review

- 2.15. The London Borough of Hounslow is currently in the process of undertaking amendments to the current Hounslow Local Plan 2015, and has consulted on Amendments to Volume 1 and Volume 2 of the Local Plan 2015, The Great West Corridor Local Plan Review and The West of Borough Review. It is agreed that the documents are at an early stage and have not yet been considered at an Examination in Public. It is agreed that there are a number of unresolved objections to the draft documents, including those from the appellants and the Greater London Authority. It is agreed that very limited weight can be attributed to the document.

Community Infrastructure Levy

- 2.16. Resolution to grant planning permission was given under the Mayors Community Infrastructure Levy (MCIL) for Crossrail (2012). This was replaced in April 2019 (known as MCIL2). The MCIL2 rates cited are agreed as applicable to the proposal.
- 2.17. It is agreed that The London Borough of Hounslow charging schedule (2015) was also applicable at the time of the resolution to grant planning permission. It is anticipated that this may be replaced in 2019 ahead of a decision by the Secretary of State and may therefore be applicable to the development and if adopted.

3. Common Ground

- 3.1. The Following matters are agreed:

Submitted Plans and Application Documents

- 3.2. The documents submitted with the planning application and its amendments prior to the Secretary of State call-in are those for which planning permission is sought. There are no subsequent changes to the proposed development.
- 3.3. It is agreed that the Environmental Statement (November 2017) and Environmental Statement Addendum (May 2018) are adequate for the determination of the application.

Principle of Development

- 3.4. It is agreed that the principle of redeveloping the site and the range of uses proposed is in accordance with the development plan as a whole.
- 3.5. It is agreed that there is no concern over the loss of the car dealership and garage as it represents an inefficient and car dominant use of this accessible site.
- 3.6. It is agreed that the principle of a mixed-use residential-led development on the site is strongly supported by the development plan.
- 3.7. It is agreed that a nursery on the site is acceptable, subject to suitable conditions.
- 3.8. It is agreed that ground floor uses of retail, employment and community uses are acceptable.
- 3.9. It is agreed that the site is not within a Strategic Industrial Location (SIL) or Locally Significant Industrial Site (LSIS).
- 3.10. It is agreed that the application is not premature to emerging planning policy.

Principle of Tall Buildings

- 3.11. It is agreed by the GLA, LBH and the applicant that the principle of tall buildings on the site is acceptable having regard to policies 7.7 of the London Plan and CC3 the LBH Local Plan.
- 3.12. However, LBH does not agree that the height, scale and design of the proposed buildings are acceptable.

Design

- 3.13. It is agreed by the GLA, LBH and the applicant that the design provides new well defined and public routes and spaces, high quality landscaping, and an improved route from

Gunnersbury Station to Brentford Community Stadium (subject to other development taking place).

- 3.14. The following points (3.15 to 3.19) are also agreed between the applicant and GLA, but not LBH.
- 3.15. It is agreed that the massing strategy responds to the site characteristics and the existing and emerging context.
- 3.16. It is agreed that the quality of design, architecture and materials will ensure a distinctive and high-quality development which will contribute positively to the regeneration of this part of Brentford.
- 3.17. It is agreed that the delivery of a high-quality public plaza and improved route from Gunnersbury Station to the Brentford Community Stadium would provide a significant public benefit
- 3.18. It is agreed that the landscaping proposals for the site significantly enhance the wider area.
- 3.19. It is agreed that the scheme was designed prior to the National Design Guide (1 October 2019). The extent that the scheme satisfactorily addresses the “ten characteristics of well-designed places” is not agreed.

Housing (General)

- 3.20. It is agreed by the GLA, LBH and the applicant that by itself the density of the proposal is acceptable taking into account the location of the proposal in relation to public transport and the quality of accommodation of the scheme, setting aside concerns relating to the height, scale and design of the scheme .
- 3.21. It is agreed that the proposed 441 homes would make a positive contribution to the Great West Corridor Opportunity Area.
- 3.22. It is agreed that the amount of affordable housing proposed is a public benefit of significant weight.
- 3.23. It is agreed between the GLA and the Applicant that the affordable housing provision proposed is eligible for the “fast track” route under the Homes for Londoners (Affordable Housing and Viability) SPG and therefore the scheme’s financial viability does not need to be reviewed and any approval would be subject to an early review mechanism only.

- 3.24. A viability report has been submitted to the LBH, and following review by the Council it is agreed between LBH and the applicant that the proposals provide the maximum reasonable amount of affordable housing.
- 3.25. Following the provision of viability information by the applicant, it is further agreed by LBH and the applicant that the proposed quantum and tenure split of affordable housing is acceptable.
- 3.26. It is agreed that the affordable housing proposed meets the Mayors definition of affordable housing and is considered to be “genuinely” affordable to Londoners.

Housing Mix

- 3.27. The Housing mix, including the amount and distribution of one, two and three bedroom homes in the development is agreed as an acceptable mix.
- 3.28. It is agreed all units will meet or exceed the National described Space Standards, London Plan, draft London Plan, Mayor’s Housing SPG and Local Plan internal space standards.
- 3.29. It is agreed that the development proposals would have an acceptable impact on neighbourhood amenity.
- 3.30. It is agreed that the proposal does not give rise to privacy or overlooking concerns with neighbours or within the development itself subject to appropriate conditions
- 3.31. It is agreed between the GLA and the Applicant that the standard of residential of the proposed scheme is high. LBH believe the residential quality for occupiers of the proposed scheme is acceptable.

Housing Provision

- 3.32. It is agreed that the London Borough of Hounslow is currently able to demonstrate a 5-year supply of housing land.
- 3.33. It is agreed that the most recent Housing Delivery Test published by MHCLG (2018) indicates a result of 78% for London Borough of Hounslow, meaning that a 20% housing land buffer is required. This Housing Delivery Test result applied the adopted London Plan target of 822 dwellings per annum which would increase to 2,182 under the Draft London Plan. However, the recently published Inspector’s Report reduces the figure to 1,782 dwellings per annum.
- 3.34. It is agreed that the average proportion of affordable homes completed within LBH as a proportion of all homes is 29% over the last 3 years for which statistics are available This was the 4th highest level of provision across London and higher than the London average of the last 3 years which was 21% (GLA Annual Monitoring Report September 2018).

Access

- 3.35. It is agreed that the proposed development is acceptable in terms of wheelchair accessibility, with 10% of units being adopted for wheelchair access (M4(3)), and the

remaining 90% complying with Part M4(2) of the Building Regulations requirement, with this to be secured by an appropriately worded condition.

- 3.36. It is agreed that the proposed development has embedded the principles of inclusive access and will comply with the relevant inclusive design housing standards.

Heritage

- 3.37. It is agreed that the site does not lie within a strategic viewing corridor, does not feature any listed buildings and is not within a conservation area.
- 3.38. It is agreed that a separate SoCG will be produced on Heritage matters. It is intended that this will involve Historic England and Royal Botanic Gardens Kew in addition to the GLA, LBH and the applicant.
- 3.39. It is agreed by LBH, GLA and the applicant that where harm has been found, it has been concluded that the harm is less than substantial.
- 3.40. It is agreed by GLA and the applicant that the public benefits of the scheme are considered to outweigh the less substantial harm identified to the setting of heritage assets.
- 3.41. It is not agreed by LBH that the public benefits of the scheme are considered to outweigh the less substantial harm identified to the setting of heritage assets.

Daylight & Sunlight

- 3.42. It is agreed that the overall proposals provide satisfactory levels of daylight and sunlight to all homes.
- 3.43. It is agreed that LBH's previous objection on Sunlight/Daylight is no longer applicable.

Noise

- 3.44. It is agreed that whilst there is potential for the proposed development to be exposed to noise and vibration from nearby road traffic on the A4 and M4, that the building design and mitigation measures enable an acceptable internal level of noise can be achieved.
- 3.45. It is agreed that a detailed scheme of mitigation would be agreed through condition, and that the wording of the condition is agreed.

Air Quality

- 3.46. It is agreed that the whole of the London Borough of Hounslow is in an Air Quality Management Area (AQMA), and that mitigation is required. It is agreed that identified air quality impacts can be suitably mitigated via the proposed design interventions and conditions.

- 3.47. It is agreed that a detailed scheme of mitigation can be agreed through condition, and that the wording of the conditions is agreed.
- 3.48. It is further agreed that a detailed scheme of mitigation for the temporary effects on air quality during construction period can be mitigated through condition, and that the wording of the condition is agreed.
- 3.49. At the time of writing, National Practice Guidance on Air Quality has been released. It is the intention to provide a further statement on this matter once both parties have had sufficient time to consider.

Wind

- 3.50. It is agreed that overall wind conditions are suitable for the intended uses in the development. It is agreed that a detailed scheme of mitigations would be agreed through condition, and that the wording of the conditions is agreed.

Light Pollution

- 3.51. At the time of writing, National Practice Guidance on Light Pollution has been released. It is the intention to provide a further statement on this matter once both parties have had sufficient time to consider.

Waste

- 3.52. It is agreed that whilst no response has been received from Hounslow's waste department to the originally submitted or amended scheme, that through condition appropriate waste and collection measures can be secured and that the wording of the condition is agreed.

Contaminated Land

- 3.53. It is agreed that based on the information available (investigation reports, and the professional opinion of the local authority Land Quality team) that the risk passed from soil and ground contamination range from negligible to medium.
- 3.54. It is agreed that through appropriate planning conditions, appropriate mitigation measures are achievable and that the wording of the condition are agreed.

Transport

- 3.55. It is agreed that the level of parking, disabled parking, electric vehicle charging points, are all appropriate to the development and its location.
- 3.56. It is agreed that the overall level of cycle parking proposed is acceptable and would exceed the minimum standards set by adopted London Plan and meets the minimum standards set in the draft London Plan.
- 3.57. It is agreed that the proposals would not materially impact traffic flow on either the TfL road network or the wider highway network.

- 3.58. It is agreed that with appropriate conditions and s106 obligations the development is able to support sustainable travel behaviours and that both the wording of the conditions and obligations are agreed.
- 3.59. It is agreed that the high-quality pedestrian and cycle environment proposed will make a positive contribution to the area and accords with Transport for London's "Healthy Streets" guidance.
- 3.60. It is agreed that the proposal optimises land in an area that supports patterns of development that minimise the need to travel, particularly by car.

Social Infrastructure

- 3.61. It is agreed that the impact of the development on social infrastructure in the area, including schools and healthcare facilities has been properly assessed and the development would have an acceptable socio-economic impact.
- 3.62. It is agreed that the provision of a nursery on site is a social benefit.
- 3.63. It is agreed that the range uses at ground floor are capable of supporting economic growth and employment.
- 3.64. It is agreed that through appropriate conditions and obligations, the development can promote equal opportunities through employment and training. This includes responding to local skills gaps.

Sustainability

- 3.65. It is agreed that the proposed development has demonstrated that a high standard of sustainable design and construction would be achieved.
- 3.66. It is agreed that the development would deliver considerable sustainable urban drainage, ecology and urban greening benefits over the existing situation at the site.
- 3.67. It is agreed that the proposals minimise carbon dioxide emissions, uses energy efficiently and includes renewable energy in accordance with the energy hierarchy of the London Plan and that appropriate conditions and obligations to secure these measures are agreed.
- 3.68. It is agreed that the proposals include measures to reduce water consumption, and that appropriate conditions to secure the measures are agreed.
- 3.69. It is agreed that the proposals have been designed to minimise overheating and that appropriate conditions to ensure appropriate living conditions are secured.
- 3.70. It is agreed that the proposal provides a significant uplift in greening and trees on the existing site.

Flood Risk and Drainage

- 3.71. It is agreed that the site is at a low risk of flooding.
- 3.72. It is agreed that the site is currently largely impermeable, and the development would improve existing surface water run-off levels.
- 3.73. It is agreed that sustainable drainage and water attenuation measures proposed are capable of restricting peak surface water flows to greenfield rates in line with London Plan and draft London Plan policy.
- 3.74. It is agreed that LBH's previous objection on drainage is no longer applicable following further information being supplied to the LBH following the original recommendation. It is agreed that proposed refusal number 5 is no longer applicable.
- 3.75. It is agreed that a detailed drainage strategy and a site-specific maintenance plan is submitted by condition. The wording of the condition is agreed between the parties.

Public Benefits

- 3.76. It is agreed that the proposals will deliver a number of public benefits. These include:
- The delivery of 441 homes
 - The delivery of 50% affordable housing by habitable room
 - Job creation
 - Improved Public Realm and a new public square
 - Environmental improvements to the area.
 - Aesthetic improvements to the site.
 - Provision of a nursery
 - Providing transformational change to a site within a proposed opportunity area.
 - Encouraging sustainable travel behaviours through a package of measures
- 3.77. The weight attached to these benefits is **not** agreed with LBH. However, the GLA and applicant agree that the public benefits of the scheme are considered to significantly outweigh the less substantial harm identified to the setting of heritage assets.

4. Areas of Disagreement with LBH

- 4.1 Whilst the site is suitable in principle for tall buildings, it is not agreed with LBH whether the height, scale and design of the proposed buildings are acceptable. The effect on the significance of various heritage assets is not agreed.
- 4.2 The planning weight attributable to the public benefits provided by the proposals is not agreed.
- 4.3 The design quality is not agreed. The extent that the scheme satisfactorily addresses the “ten characteristics of well-designed places” of the National Design Guide is not agreed.
- 4.4 The residential quality is not agreed. LBH believe it to be acceptable. The GLA and applicant believe it to be high.

5. Conditions and Planning Obligations

Conditions

- 5.1 A schedule of conditions has been agreed between the Greater London Authority, the London Borough of Hounslow and L&Q. A full list of agreed conditions is provided in Appendix 1.
- 5.2 Planning obligations will be dealt with by way of a section 106 agreement deed.

Planning Obligations

- 5.3 A section 106 agreement has been drafted, and the obligations are agreed subject to final drafting.
- 5.4 The substantive points of the legal agreement are agreed. It is anticipated that the deed will be finalised prior to the inquiry that a completed version can be sent to the Planning Inspectorate shortly after close of the inquiry.

6 Signatories

The above Statement of Common Ground Site for land at Citroen Site, Capital Interchange Way, Brentford, TW8 0EX with the Planning Inspectorate Reference: APP/G6100/V/19/3226914 and dated 22 November is agreed between L&Q, as the Applicant, The Greater London Authority, as Local Planning Authority and The London Borough of Hounslow, as Rule 6 Party.

Signed on behalf of Applicant (L&Q)	Signed on behalf of The Local Planning Authority (Greater London Authority).	Signed on behalf of London Borough of Hounslow
Date -	Date – 22 November 2019	Date -22 November 2019
Mark Connell	Juliemma McLoughlin	Shane Baker
Position – Managing Director Sphere 25	Position – Chief Planner	Position – Deputy Head of Growth and Opportunity Areas
		